



MINUTES
Rate Structure Work Group Meeting
Friday June 9, 2023 / 10:00AM - 12:00PM
Held via: Zoom Webinar

Attendance: Laurie Vachon, BDS Facilitator; Jen Doig, BDS Facilitator; Christy Roy, DHHS Facilitator; Abby Conger, BDS; Drew Smith, A&M; Krista Stephani, MSLC; Lesley Beerends, MSLC; Jacquelyn George, MSLC; Kim Shottes, ED Plus Company; Martin McNamara, Optumas; Will Walker, Family Member; Ellen McCahon, ED CSNI; Matthew Cordaro, ED One Sky Services; Shelley Kelleher, CFO Lakes Region Community Services; Sudip Adhikari, Gateways; Kara Nickulas, CMCC; Alecia Ortiz, A&M; Susan Silsby, Easter Seals

Please reference the corresponding slide presentation for the detailed agenda, including topics and themes covered in the meeting and corresponding takeaways and applicable action items.

Topic	Key Takeaways & Action Items
Feedback Received for the Direct Support Professional (DSP) Wages	<p><u>General Comments on Feedback</u></p> <ul style="list-style-type: none"> • Myers and Stauffer asked for members of the Rate Work Group to participate in a feedback assignment on the initial, draft wages, proposed for DSPs. • Five responses were received. Some responses included comments regarding education levels associated with Bureau of Labor Statistic (BLS) job categories. <ul style="list-style-type: none"> ○ Education levels were provided in the assignment for informational purposes only. ○ Education levels noted in the BLS data do not indicate requirements for services in New Hampshire. • DSP wages shown today are for discussion purposes only. • Wages do not represent a fully calculated rate for any service. <p><u>Service Coordination Wages</u></p> <ul style="list-style-type: none"> • Original wage proposed by BDS: \$30.77. • Cost report weighted average wage: \$21.31 • BDS Revised proposed wage, considering feedback: \$30.77 • Feedback did propose looking at different BLS occupational codes.

- A review of the proposed codes suggested that the descriptions did not fit well with New Hampshire’s service coordination services.
- The suggested codes’ wages were both lower and higher than the proposed DSP wage.
- The suggested weighting of the proposed occupations codes in the feedback was consistent with BDS proposed weights.
- The BDS proposed wage is representative of the wages received from feedback.

Day Habilitation/Community Participation Services (CPS) Wages

- Original wage proposed by BDS: \$19.37
- Cost report weighted average wage: \$16.33
- BDS Revised proposed wage, considering feedback: \$20.09
- Three responses received from the feedback assignment asked to consider using occupation code 21-1015 Rehabilitation Counselors.
 - BDS was in agreement and this code was added to the DSP wage model.
 - This did result in a change to the weights between occupation codes.
- **Question:** We provided feedback on the home health and recreation worker wages. We believe we should utilize a higher percentile for these occupation codes because of hiring challenges. Can this be considered?
 - **Myers and Stauffer Response:** At this point in time, we are using the median (50th percentile). This concern may be addressed when we evaluate wages accounting for individual acuity levels.
 - **Comment:** 40% of some services go undelivered today because of the low rate. I just wonder about targeted rate increases. I would ask for further consideration regarding higher percentiles.
 - **Comment:** Some positions are more technical in nature and would require a higher wage percentile. There is concern about these new rates covering provider needs.
 - **Department Response:** The goal currently is to establish a base wage. Moving forward we can evaluate how rates may change to account for medical or behavioral health needs, and acuity.

Community Support Services (CSS) Wages

- Original wage proposed by BDS: \$22.75
- Cost report weighted average wage: \$15.67

- BDS Revised proposed wage, considering feedback: \$22.75
- Four of the responses received agreed with the occupation codes proposed by BDS.
- One response did recommend using two additional occupational codes. These recommendations aligned with the original proposed codes and wages, so no changes were made.

Crisis Wages

- Original wage proposed by BDS: \$22.72
- Cost report weighted average wage: \$15.43
- BDS Revised proposed wage, considering feedback: \$22.72
- One response suggested using occupation code reflecting Healthcare Social Workers to account for the technical assistance provided by supervisors.
 - After reviewing, it was determined that considerations for supervisory roles for this service should be accounted for in the program related expenses (PRE) component of the rate.
- Other recommendations suggested including two other occupation codes into the calculations.
- The BDS proposed wage is representative of the wages received in the feedback from Rate Work Group members.
- **Question:** Feedback was provided pointing out that the provisioning of crisis services will result in overtime for DSPs. Should this be included in the DSP wage component?
 - **Myers and Stauffer Response:** When the overall rate is calculated for, overtime will be considered, but overtime is not included in the base DSP wage component.
- **Question:** Crisis service provisioning is not a typical part of a DSPs day. In consideration of this, and acknowledging provider shortages, is there a way to build in incentives for this service? Additionally, are there concerns with having the crisis service DSP wage the same as the day programs wage?
 - **Department Response:** The proposed crisis service DSP wage is higher than that proposed for Day Supports. As Myers and Stauffer indicated, when the full rate is developed, they will consider items like incentives and overtime within the overall rate.

Staffed Residential Wages

- Original wage proposed by BDS: \$18.45
- Cost report weighted average wage: \$16.56
- BDS Revised proposed wage, considering feedback: \$21.88

- For residential wages, BDS is proposing a consistent DSP wage for all residential services.
- The setting of the residential services generally does not have an impact, but Myers and Stauffer will still take into account levels of services.
- Four of five responses agreed with the proposed occupation codes, though at least one response indicated a higher weight should be placed on the occupation code for Psychiatric Aides.
- The fifth response suggested incorporating occupation codes for Health Education Specialists and Licensed Practical and Licensed Vocational Nurses.
 - When considering wages for nurses, care has to be taken to separate out services that should be covered under the Medicaid state plan from 1915(c) waiver services.
 - Building in wages for licensed practical nurses is something to consider as these services are generally provided by the Medicaid state plan.
 - Medication management will be built into the overall rate, not the base DSP wage component.
- Based on the feedback, BDS did revise the proposed wage. The weights for Home Health and Psychiatric Aides were changed.
- **Comment:** I do not believe enough consideration is being given for DSPs who provide medication administration. This is significant for our staff and it struck me that their wages were lower.
 - **Myers and Stauffer Response:** Thank you for the feedback. We will take this back for further discussion.
- **Comment:** The wage is not sufficient because staff work holidays and weekends. I know there will be additives for higher levels, but this should not be less than CSS DSP wages, in my opinion.
 - **Myers and Stauffer Response:** Thank you. We are documenting all of this feedback for further consideration. In addition to holidays and weekends, overnight shifts will also be accounted for in another component of the rate calculation. Holidays, weekends, and overnight shifts will be considered similarly to the way we will handle training time. They will be a wage factor adjustment as part of the overall rate, but will not be considered in the base DSP wage component.
 - **Department Response:** A service like CSS may not have as many of these factors built in, because it is not always provided as a 24 hour service, rather CSS is more of an “in and out” service. These types of scenarios will be looked at as part of the rate calculation.

- **Comment:** I agree with everything that has been said. I do not agree with having residential wages being less than those for CSS. In addition, I also suggested using the nursing occupational codes because of their roles. Lastly, we have different rates of payment currently for overnight and weekend shifts, and overtime is on top of this.
 - **Myers and Stauffer Response:** Again, thank you for the feedback. Everything shared in this discussion will be brought back for consideration. We are planning on considering different shift times and overtime in the rate calculation.

Residential Support Staff Wages for Staff to Assist Enhanced Family Care Providers

- Original wage proposed by BDS: \$18.45
- Cost report weighted average wage: \$19.66
- BDS Revised proposed wage, considering feedback: \$21.88
- Four of the five responses agreed with the proposed occupation codes; however, based on feedback, weights were adjusted for the original codes.
- Consideration will be given to different levels as well.
- **Comment:** I think this suggested DSP wage is fine, though I do not believe it should be the same wage used for staffed residences. I have both lines of service and given the different services, it doesn't seem that the wages should be the same.
 - Another Rate Work Group member and a member of the public voiced support for this comment.
 - **Department Response:** Your feedback is really important. You all know that we support people with very high needs in Enhanced Family Care Settings. We have been thinking as the "service is the service" regarding wages but that other components of the fully calculated rate would be different. This said, we are open to feedback about considering the DSP wages differently.
- **Question:** Is this DSP the person who is providing care in a day facility?
 - **Department Response:** No, this is the home care worker who will go into a home to support extra staff. This DSP would be helping to support a person in a home environment that requires additional staff during certain parts of the day, nights, or weekends. This helps reduce the need to move individuals into a full-time staffed residence.
- **Comment:** Depending on the situation, the service could be billed as day habilitation or CSS. But if an individual really does have higher needs, we would typically use residential staff to help support that person (this has a higher rate). If we are using

residential staff, I would assume this should be billed at the residential rate.

- **Department Response:** If a DSP is providing day services in a home it would be billed accordingly.
- **Comment:** Typically, this service is billed on a 1:1 ratio. In a staffed residence, it is a different ratio.
- **Myers and Stauffer Response:** Ratios will be a separate portion of the rate calculation. It would not drive the wage up. We could make some considerations for the productivity factor.
- **Department Response:** The ratio will not affect the wage, but the overall rate. It will be incumbent upon the provider to decide how to compensate the DSP.

HE-M S21 and HE-M S25 Residential Services Wages

- Original wage proposed by BDS: \$18.45
- Cost report weighted average wage: \$15.53
- BDS Revised proposed wage, considering feedback: \$21.88
- Three of five responses agreed with the proposed occupation codes.
- Feedback included adding the occupation code for Licensed Practical and Licensed Vocational Nurses.
 - This occupation codes was not added for the same reasons as previously discussed.
- Weights were adjusted to allow for a higher weight to be placed on Psychiatric Aides.

Respite Wages

- Original wage proposed by BDS: \$16.72
- Cost report weighted average wage: \$13.33
- BDS Revised proposed wage, considering feedback: \$16.72
- Three of the five responses agreed with the one occupation code proposed by BDS.
- Feedback including having BDS consider adding the occupation codes for Psychiatric Aides and Nursing Assistants.
 - No changes were made as a result of feedback.
- **Question:** Can you clarify in what context is this respite that we are discussing? Is this family support respite?
 - **Department Response:** Currently, respite is a service that relieves the primary caregiver.
- **Question:** How is this different from 521?
 - **Department Response:** In 521, DSPs are billing a residential service and there are more requirements around this service.

- **Comment:** One thing that is often implied with respite is that the service is like babysitting. Respite requires a lot of work and skill and this position is close to a DSP role.
 - **Department Response:** Thank you. We are seeing that respite happens within family networks. We are not seeing a lot of DSPs being hired for respite. The current rules for waiver respite are not as strict as some other services.
- **Comments:** Several additional comments were received indicating that the base wage being considered is too low, even if different levels for acuity or staffing are considered. One commenter offered that the median wage for the proposed occupation code be raised. Another commenter suggested that the reason rates for respite have been low historically is that families are relying on other family members and friends, and payment is provided based on what a family can afford. It was suggested that respite wages match those proposed for day habilitation. A member of the public also added that waiver providers are often in direct competition with fast food restaurants and grocery store employees, and that DSPs should be paid more.
 - **Myers and Stauffer Response:** Thank you for all of this feedback. We would note that respite may still have benefits added as a component to the rate, even if these individuals are not employed by an agency. This may increase the overall rate.
 - **Department Response:** Thank you for the feedback. This is exactly the kind of conversation we are looking for. We need this feedback in order to evaluate and determine if changes are needed.

Supported Employment Wages

- Original wage proposed by BDS: \$22.47
- Cost report weighted average wage: \$16.35
- BDS Revised proposed wage, considering feedback: \$22.47
- There were no recommended changes based on the feedback received.
- **Question:** Are there going to be levels for this service?
 - **Myers and Stauffer Response:** Yes.
- **Comment:** I want to clarify that this position is more like a DSP and is not necessarily a specialist. This position is really the person who helps provide long-term supports to the individual. Separate from this is the job developer role who looks for employment leads for an individual. They are highly trained and I consider these positions to be different people.

- **Department Response:** It is likely that a supervisory and job developer role will be included in another component of the rate calculation. This wage is really reflective of the person providing the service, but we know there are a lot of supports that go into Supported Employment.
- **Myers and Stauffer Response:** The PRE component will include these types of considerations.

Specialty Services Level 1 Wages

- Original wage proposed by BDS: \$36.95
- Cost report weighted average wage: \$24.31
- BDS Revised proposed wage, considering feedback: \$36.95
- Four of the five responses agreed with the proposed occupation codes.
- One response suggested using only the occupation code for Healthcare Social Workers.
- Three of the five responses agreed with the BDS weighting proposal.
- **Question:** Are there any considerations about credentials for this service?
 - **Department Response:** Yes, again what is presented here is just the base wage. We may consider differences in the Level 1 service, for professions like licensed and non-licensed social workers.
- **Comment:** Several Rate Work Group participants offered suggestions for how to consider different credentials within the rate calculation, including considering credentials in different billing codes.

Specialty Services Level 2 Wages

- Original wage proposed by BDS: \$46.51
- Cost report weighted average wage: \$24.31
- BDS Revised proposed wage, considering feedback: \$54.42
- All five responses agreed with occupation codes.
- Three responses did suggest changes to the weights applied to the occupation codes.
- **Comments:** Two Rate Work Group members suggested the weights applied to the proposed codes are too low, and multiple Rate Work Groups suggested that the base wage is too low. One commenter specifically mentioned wanting to consider weighting psychiatrists higher because of the higher credentialing generally seen for these providers.

	<ul style="list-style-type: none"> ○ Myers and Stauffer Response: Thank you for the feedback. This is really just the base wage for DSPs. We can safely say the rate calculation will result in a higher overall rate than the proposed base DSP wage.
<p style="text-align: center;">General Questions and Comments</p>	<ul style="list-style-type: none"> ● Question: Is it required that the wage components presented here are what is paid to DSPs? <ul style="list-style-type: none"> ○ Myers and Stauffer Response: No. This does not represent what must be paid to a DSP. ● Question: Will you be taking into account blending rates between occupational codes? <ul style="list-style-type: none"> ○ Myers and Stauffer Response: Yes. We may be considering a 50/50 split if we are blending wages from two codes, but this may not always be the case. It will depend on the service. ● Question: Are DSP credentials considered for any of these services, including most specifically the supported employment service? <ul style="list-style-type: none"> ○ Myers and Stauffer Response: We will need to discuss credentialing in more detail with the Department. It is a discussion for the future and it is not reflected in the base wages presented today, though it is possible that credentials will be an add-on to a rate, rather than reflected in the base DSP wage component. ● Question: Will there be PRE for services? <ul style="list-style-type: none"> ○ Myers and Stauffer Response: There will be PRE components for specific service rates. PRE information from cost reports will be used. ● Question: On average, what is the increase, on the average, added to the base wages to get to the final rate? <ul style="list-style-type: none"> ○ Myers and Stauffer Response: It is different depending on the service. Depending on the productivity factor, PRE, and other rate components, this will make a huge difference. ● Question: What is the timeframe that these rates will be established? <ul style="list-style-type: none"> ○ Department Response: We are working through all of these different components. You will be informed as we continue to do that. The hope is to have rates in place by the winter of 2023.
<p style="text-align: center;">Next Steps</p>	<ul style="list-style-type: none"> ● Myers and Stauffer will review the feedback discussed during this meeting with the Department. ● Work continues on reviewing and calculating other proposed rate components. ● Fiscal modeling and fiscal impacts are also taking place.

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| | <ul style="list-style-type: none">• Once base rates are developed, the next step is to consider different staffing and acuity levels, as well as the SIS data. |
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