



# DEVELOPMENTAL PROGRAMS BULLETIN

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF PUBLIC WELFARE

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SUBJECT:

**Supports Coordination Services**

BY:

  
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Deputy Secretary for Developmental Programs

## SCOPE:

Administrative Entity (AE) Administrators or Directors  
County Mental Health and Mental Retardation Program Administrators  
Supports Coordination Organization (SCO) Directors  
Targeted Services Management (TSM) Provider Directors

## PURPOSE:

The purpose of this bulletin is to establish policies and communicate requirements for the consistent statewide delivery of Supports Coordination services through Supports Coordination Organizations (SCOs), which include Waiver-funded Supports Coordination, Targeted Service Management (TSM)-funded Supports Coordination, and Base-funded Supports Coordination. SCOs are responsible for planning, locating, coordinating, and monitoring supports and services for individuals who are found eligible and registered for Mental Retardation (MR) services.

## BACKGROUND:

The purpose of the Supports Coordination service is to promote an individual's right to an *Everyday Life*, as defined in Mental Retardation System (now Office of Developmental Programs) Bulletin 00-03-05, *Principles for the Mental Retardation System*, or any approved revisions, utilizing Person Centered planning and Self-Determination principles. Support Coordinators (SCs) must use the Home and Community Services Information System (HCSIS) to ensure accountability and promote quality in services and supports.

In 2003, ODP initiated a workgroup of the Planning Advisory Committee (PAC) that developed ten recommendations that called for ODP to provide an adequate number of highly trained SCs statewide. The recommendations also called for standardized practices and individual choice of SCs and SCOs. These recommendations stated that individuals and families must have ongoing access to effective, responsive, and reliable individual Supports Coordination services.

COMMENTS AND QUESTIONS REGARDING THIS BULLETIN SHOULD BE DIRECTED TO:

**Appropriate Regional Office of Developmental Programs**

ODP shared these recommendations statewide through a series of forums. Testimony at these forums emphasized the need for standardized practices, streamlined processes and training directly related to SCs' roles and responsibilities. The recommendations were further explored by workgroups comprised of a variety of stakeholders, including SCs, SC Supervisors, individuals receiving SC services, families, County Program representatives, AE representatives, and ODP staff.

**POLICY:**

The policies and procedures outlined in this bulletin provide further detail regarding the roles and responsibilities of AEs, County Programs, SCOs, and SCs in relation to the provision of Supports Coordination Services. SCOs that provide SC services to individuals enrolled in the Waivers must comply with *The Provider Agreement for Participation in Pennsylvania's Consolidated and Person/Family Directed Support Waivers*, or any approved revisions, and the approved Waivers. TSM SCOs are required to comply with all applicable laws, regulations, and ODP bulletins or any approved revisions.

**AE and County Program Roles and Responsibilities:**

ODP has established the following requirements for AEs and County Programs related to the delivery of Supports Coordination Services. The AE or County Program is responsible to:

- A. Comply with requirements set forth in the Act of 1966 for County Programs, 55 Pa.Code Chapter 6201 (relating to County mental retardation services), the Consolidated and Person/Family Directed Support (P/FDS) Waivers (Waivers) and all other applicable laws, rules, regulations and ODP policy bulletins as they relate to their responsibility for the delivery of SC services. This includes but is not limited to responsibilities related to Individual Support Plan (ISP) approval, service authorization and oversight of the delivery of the services included in the ISP.
- B. Monitor SCOs on no less than an annual basis to assure compliance with all related and applicable regulations, policies and the approved Waivers when applicable.
  - 1. AE monitoring of Waiver-funded SCOs shall be completed per the current AE Operating Agreement, approved Waivers and the ODP SCO monitoring protocol.
  - 2. County Program monitoring of TSM SCOs must include relevant Medical Assistance (MA)/TSM requirements.
  - 3. County Program monitoring of all other SCOs should be documented on a County developed monitoring tool or by utilizing the ODP monitoring protocol for waiver funded SCO monitoring.

C. Share information with SCOs regarding:

1. Website for SCOs to review licensing citations of ODP licensed providers for individuals associated with the SCO.:  
<http://www.dpw.state.pa.us/ServicesPrograms/ChildCareEarlyEd/003670755.aspx>.
2. Results of the AE Oversight Monitoring Process conducted by ODP.
3. Results of AE Annual Administrative Review.
4. Independent Monitoring for Quality (IM4Q). This includes but is not limited to data, results, reports and considerations.
5. Program and service evaluations conducted by County Mental Health and Mental Retardation Boards.
6. Any other relevant information that will support the effective delivery of SC services.

D. Document that individuals are informed of their right to choose willing and qualified providers, including their SCO when receiving TSM or Waiver-funded Supports Coordination. The AE must have a written procedure in place to ensure the offering waiver participants with the choice of willing and qualified providers in accordance with applicable regulations, approved waivers and policies.

1. ODP encourages County Programs to provide the same level of choice for Base-funded Supports Coordination as individuals have through both Waiver-funded and TSM Medicaid funded Supports Coordination.
2. When an individual selects an SCO other than the SCO(s) that is physically present in their registration county, the AE or County must ensure that HCSIS functionality is used to process the request for the selected SCO of the individual's choice. This selection may occur at intake or enrollment into the Waiver, but free choice may also be exercised by individuals at any time. As a matter of courtesy, it is expected that the current AE or County Program shall contact the newly selected SCO before the change is initiated in HCSIS.

If an individual receiving SC services requests to change SCOs, the County Program or AE will use HCSIS "wizard" functionality or any approved revisions to notify the requested SCO that they have been selected by choice of the individual to provide SC services. This process will continue until such time a chosen, qualified and willing provider of SC services accepts to provide SC services for the individual. The SCO currently providing services will continue to provide SC services in accordance with requirements until such time a new SCO provider is secured.

**SCO Roles and Responsibilities:**

Individuals who are receiving Supports Coordination services through TSM or the Waivers must have a choice of willing, qualified SCOs. ODP recommends that individuals receiving Base-funded SC services also be provided a choice of willing and qualified SCOs.

ODP has established the following requirements regarding the administration and delivery of Supports Coordination Services. The SCO is responsible to:

- A. Inform individuals at the initial ISP meeting and at least annually thereafter of the right to choose a willing and qualified waiver providers, including choice of SCO. The action and outcome must be documented in HCSIS service notes, on the individual's ISP and on the ISP signature page. A receiving SCO may limit choice due to personnel limitations and geographic distances, however, those decisions must be explained and documented. Individuals may request a specific Supports Coordinator at intake and any time thereafter. While preference for Supports Coordinators will generally be honored, there may be circumstances that prevent an individual or family from being able to select a particular Supports Coordinator. Geography, staffing levels, and caseload size are examples of things that may influence an SCO's ability to provide choice. It is the responsibility of the Supports Coordination Organization to determine the reasons for denying choice and document actions taken in service notes. Choice of Supports Coordinator will be monitored through the Administrative Entity Oversight Process, including a review of the conditions that necessitated a change of Supports Coordinator.
- B. Upon receipt of the HCSIS notification to transfer an individual, the requested SCO shall accept or decline to serve the individual based upon:
  - 1. Caseload availability.
  - 2. Inadequate documentation related to transfer.
  - 3. Distance to travel that precludes effective oversight, which *may* include individuals residing in non-contiguous counties or in a county that spans a large geographical area.
  - 4. Conflict of interest.
  - 5. Determination that the supports coordination needs of the person are beyond the organization's ability to provide in accordance with State and Federal requirements.

If an SCO is not able to accept the requested transfer, the reason for not accepting must be entered in HCSIS through the case management screens as appropriate, and must be entered in the "Refer Back Comments" on the confirmation screen. SCOs will utilize any revisions to the HCSIS screens.

The current SCO must continue to provide SC services in accordance with requirements until a new SCO provider is secured.

- C. Meet the standards for service delivery outlined in this bulletin. For Waiver-funded Supports Coordination, Waiver specific requirements are outlined in the Supports Coordination service definition and provider qualification standards included in the approved Waivers, and *The Provider Agreement for Participation in Pennsylvania's Consolidation and Person/Family Directed Support (P/FDS) Waivers*. For Supports Coordination provided through TSM, the TSM specific requirements are outlined in the Service Management Amendment to the *State Plan Under Title XIX of the Social Security*

Act, "Targeted Service Management for Persons with Mental Retardation," and the TSM Provider Agreement with ODP or any approved revisions. For Base-funded Supports Coordination, the base-funded specific requirements are outlined in 55 Pa.Code Chapter 6201 (relating to County mental retardation services).

- D. Develop written procedures for the effective delivery of Supports Coordination Services in accordance with applicable regulations, policies and the approved Waivers and provide training to the SCs on those procedures.
- E. Continually evaluate its organizational structure and effectiveness and update written procedures, as needed.
- F. Maintain proficiency in the use of HCSIS to meet all requirements.
- G. Review Licensing Summaries for Providers who support individuals receiving Waiver services coordinated through an SCO at <http://www.dpw.state.pa.us/ServicesPrograms/ChildCareEarlyEd/003670755.aspx> and, when appropriate, share this information with SCs when there may be a risk to the health and welfare of individuals.
- H. Ensure SCs utilize service notes to document all contacts and actions.
- I. Ensure SCs utilize the monitoring tool in HCSIS to document findings and concerns of monitorings, as well as the resolution of those findings and concerns.
- J. Providers of Waiver-funded Supports Coordination must meet the conflict-free standards for Waiver-funded Supports Coordination services outlined in the current, approved Waivers Providers of TSM services must meet the conflict-free standards outlined in Bulletin 00-02-06, *Revision of Definition of Conflict Free Providers for Targeted Service Management* or any approved revisions.
- K. Develop a system to assure individuals' and families' ability to access SCs in a timely manner and assure coverage in the absence of the SC.
- L. Ensure the completion of ISPs for submission to the AE or County Program for approval or authorization, as per the timelines outlined in the ISP Bulletin, ISP Manual and ISP Guidelines or any approved revisions.
- M. Promote and ensure that SCs maintain the required frequency and standards for contacts with Waiver participants, as outlined in the current, approved Waivers. Promote and ensure that SCs maintain the required frequency and standards for contacts with Base and TSM participants, as stated in Section 301 of *The Mental Health/Mental Retardation Act of 1966* and in accordance with County Mental Retardation Services Regulations, 55 Pa.Code § 6201.13(2)(c)(5) (relating to intake services).

- N. Ensure that all SCs complete required annual training in addition to local training and professional development.
- O. Develop and use a standard satisfaction survey, and utilize survey results to promote continuous quality improvement activities when providing Supports Coordination services.
- P. Track that IM4Q considerations related to individuals receiving services through the SCO are addressed.
- Q. For Waiver-funded Supports Coordination services, SCOs are required to:
  - 1. Develop and implement a written protocol, including at a minimum the process and a timeline for completion of the activities identified below, for distribution of the *Office of Developmental Programs Supports Coordination Satisfaction Survey* (Survey), located at [www.odpconsulting.net](http://www.odpconsulting.net) at least once every two years from the last Survey distribution initiation date.
    - a. Complete the standard Survey for a representative sample as required, and utilize survey results to promote continuous quality improvement activities.
    - b. The SCO shall submit its written Survey protocol documents to the appropriate AE, the regional ODP or one of its designees upon request or in concert with verification of qualification or monitoring conducted by said entity.
    - c. The SCO shall notify the appropriate AE and regional ODP of the date it will initiate the distribution of the Survey. This distribution initiation date will be used to track compliance related to this requirement.
    - d. The SCO shall distribute the Survey to at least 30 percent of the Waiver participants the SCO serves during that survey period. If 30 percent does not yield 50 participants the SCO shall identify additional participants until a minimum of 50 participants are identified. If the SCO does not provide services to at least 50 participants, the SCO shall distribute the Survey to the total number of Waiver participants it service during the survey period. .
    - e. The SCO shall analyze Survey results in order to identify SCO programmatic issues, aggregate trends and patterns of concern, Supports Coordination problematic issues and issues of non-compliance with the Waivers or policies.
    - f. The SCO shall create a report based on the Survey results which includes the number of Surveys mailed, the response rate and a summary of the Survey trends, patterns and issues identified.

- g. If the Survey report reveals that the SCO is not in compliance with the Waivers, the SCO shall develop and implement a corrective action plan in response to the issues identified in the report, including target dates of activity completion and corrective action validation methods.
  - h. The SCO shall identify a document submission due date, which must be within 6 months from the Survey distribution initiation date, and submit the Survey report and corrective action plan, if applicable, to the appropriate AE(s) and regional ODP according to the SCO's established protocol timeline. Any requests for extensions of the document submission due date must be approved by the ODP Regional Program Manager.
  - i. If the Survey report reveals issues that, while not out of compliance with the Waiver or policies, are identified to negatively impact customer satisfaction or indicate an SCO problematic trend or pattern, these issues should be responded to by means of the SCO's quality improvement management strategy.
2. Cooperate with the appropriate AE(s) in securing and maintaining current eligibility information for each Waiver participant.
  3. Develop a corrective action plan as requested by the AE in response to issues identified through AE oversight monitoring or the AEs annual administrative review or provider monitoring activities.
  4. Collaborate with the AE(s) and the statewide Standardized Needs Assessment (SNA) contractor regarding the identification of respondents in order for the contractor to be able to develop the schedule for the statewide SNA.
    - a. The SCO shall develop and implement a protocol for ensuring that Waiver participants and families are informed about the SNA process upon the participant's admission into the Waiver, when identified to participate in the SNA process, and upon request.
    - b. The SCO shall submit the written protocol to the appropriate AE(s), ODP or one of its designees upon request or in concert with verification of qualification or monitoring conducted by said entity.
  5. Develop and implement a written protocol detailing the programmatic processes completed by all SCO personnel, including SC supervisors and SCs, to monitor services authorized in ISPs in accordance with the approved Waivers. The SCO shall identify by job title the personnel responsible for completion of monitoring activities, addressing unresolved issues , and the completion of the following activities:

- a. If an issue identified through monitoring presents an imminent risk to the health and welfare of a participant, the SCO shall immediately notify the appropriate AE and ODP Regional Program Manager (RPM) and provider if applicable.
  - b. If issues identified remain uncorrected by the provider or the identified issues remain unresolved beyond the period specified in an approved corrective action plan, the SCO shall notify the appropriate AE.
  - c. The SCO shall maintain documentation in HCSIS of all activities related to monitoring of services, including monitoring a provider's corrective action plan activities and remediation efforts.
6. Ensure that all new SCs who will provide Supports Coordination for Waiver participants complete the ODP required orientation prior to working independently with participants as specified in the approved Waivers.
7. Develop and provide training to all appropriate SCO personnel related to implementation of the current ODP incident management bulletin, including but not limited to: identifying contact personnel, procedural activities and responsible personnel, timely incident reporting and appropriate response, reviewing incident reports, identification of incidents which place individuals at risk, risk prevention activities and reporting processes, following-up on incidents to ensure the health and welfare of Waiver participants, monitoring corrective action plans, conducting and/or participating in certified investigations and completion of semi-annual reports, as required.
  - a. The SCO shall maintain the ability to investigate incidents or have incidents investigated when the reported incident is related to the delivery of Supports Coordination services.
8. Participate in the Waiver service provider claims resolution support process as it relates to the completion, update or correction of information on an ISP in order to assist providers in the timely resolution of denied claims resulting from issues with ISPs or discrepancies between HCSIS, PROMISE™ and information maintained by County Assistance Offices. This participation in the claims resolution support applies to both initial claims submissions and support to resolve denied claims.
  - a. The SCO shall designate staff to serve as the point of contact for claims issues and will advise the appropriate providers and AE(s) of this designation in writing.
9. Participate in utilization review and management activities developed by ODP.
  - a. The SCO shall discuss service delays and alternatives to the currently approved and authorized services with the ISP team and revise the ISP if

needed in accordance with the ISP team's decisions for alternative services or providers or both.

- b. The SCO shall notify the AE of utilization issues and service delays that can not be resolved by the ISP team or through corrective action by the Waiver provider.

ODP recommends that TSM-funded and Base-funded SCOs develop written procedures for the above requirements that have been outlined for Waiver-funded SCOs.

### **Supports Coordinator Roles and Responsibilities:**

The role of the SC is to locate, coordinate, and monitor services for individuals. The following SC functions define the actions associated with those roles:

- A. Facilitate team participation and ISP development.
- B. Complete quality ISPs, including critical revisions as per the timelines outlined in the ISP Bulletin and Manual. For individuals receiving services through the waivers, the *Supports Intensity Scale™ (SIS™)* and *PA Plus* assessment tool will be utilized in the ISP process.
- C. Distribute ISPs that have been approved and authorized by the AE or County Program, as per the timelines outlined in the ISP Bulletin and Manual.
- D. Locate services and make referrals to providers on behalf of individuals.
- E. Coordinate supports and services for the individual receiving services.
- F. Monitor and verify that individuals receive the quality, type, duration and frequency of services and supports outlined in the ISP.
- G. Verify health and welfare of participants through meetings with the individual and their family.
- H. Provide follow-up and track activities related to ODP approved corrective action plans.
- I. Participate in mandatory and ongoing training to enhance skills.
- J. Finalize the initial Prioritization of Urgency of Need for Services (PUNS) and update and complete the PUNS as indicated in the current *PUNS Manual* and the *Electronic Resource Guide For Supports Coordinators and SC Supervisors*.
- K. Inform individuals of their appeal rights. For base funded individuals this will occur through the County hearing process and for waiver-funded participants this will occur through the Fair Hearing process. This will occur whenever any decision or action is taken that requires rights to Due Process.

- L. Complete Service Notes in HCSIS to reflect all contacts and actions in regards to the individual and their services including assessments, reviews, actions and monitoring, in a timely manner.
- M. Utilize *the curent The Electronic Resource Guide for Supports Coordinators and SC Supervisors* (05/19/2009), PA Dept. of Public Welfare, Office of Developmental Program.

**Standards for providing Supports Coordination services:**

Through effective, responsive and reliable customer service, the SC empowers individuals and families. For this to transpire, the SC listens to what individuals need, helps them plan for those needs, assists them in choosing needed services and supports and monitors implementation of those chosen services and supports. The below charts outline the standards which the SC will follow so that the expected SC standards can be met.

1. ISP	Standards
Completion of the ISP.  <i>For Initial Plan Creation and Annual Review ISPs. (For SC responsibilities regarding Fiscal Year Renewal ISPs, please refer to the ISP Bulletin and Manual.)</i>	Invite and encourage individual, family and team participation in the ISP process.
	Team members shall be given advance notice within 30 calendar days of the date of the meeting to attend ISP meetings.
	Begin information gathering within 90 calendar days prior to the Annual Review Update date.
	Hold the ISP meeting within 60 to 90 calendar days prior to the Annual Review Update date.
	Enter the ISP in HCSIS and submit the ISP for approval within 30 calendar days prior to the Annual Review Update date.
	Copies of ISPs shall be made available to the team members within 14 calendar days prior to the effective date of the ISP.
2. Service Notes	Standards
Document all contacts with individuals, families, providers, etc.	Service notes shall be entered into HCSIS within 7 calendar days of the date of contact.

3. Supports Coordinator Responsiveness	Standards
Follow-up.	SCs shall respond to emergency inquiries within 24 hours of receipt of a call or email.
Track corrective action.	SCs shall respond to non-emergency inquiries within 3 calendar days.
	<p>SCs shall track appropriate corrective action relative to:</p> <ul style="list-style-type: none"> <li>✓ Concerns resulting through ISP Monitoring.</li> <li>✓ Incident management.</li> <li>✓ IM4Q, AE self-reviews, AE Oversight Monitoring and other external monitoring as they relate to the individual.</li> </ul>
4. Primary Functions	Standards
Locate, coordinate and monitor.	<u>Locate:</u> Link, arrange for, and obtain needed services including medical, social, habilitation, education or other community services the individual needs to live at home or in the community.
	<u>Coordinate:</u> Coordinate services and supports and develop ISPs with the individual and their planning team, and update the ISP as needed based on the individual's needs. Provide ongoing management of services and supports stipulated in the ISP in cooperation with the individual, family and providers of service.
	<u>Monitor:</u> Establish and implement a means to assure the individual is receiving the appropriate quality, type, duration and frequency of services and supports outlined in the ISP.
5. Monitoring Services	Standards
Complete monitoring tool in HCSIS.	<p>Monitoring findings shall be entered into HCSIS using the standard ISP Monitoring form within 14 calendar days of the date of monitoring.</p> <p>Monitoring must occur in accordance with the approved Waivers and ODP policy and meet the required standards of funding sources received by the individual.</p>

6. Monitoring Process	Standards
<p>Each monitoring contact should promote the values of <i>Everyday Lives</i> and Self Determination.</p>	<p>Everyone can and does make choices.</p>
	<p>Everyone can and does have control over his or her life.</p>
	<p>Everyone is different and there is value in difference. Therefore, supports and services need to be individualized.</p>
	<p>Each monitoring visit with the individual will include a review of:</p> <ul style="list-style-type: none"> <li>✓ Progress toward outcomes in the ISP.</li> <li>✓ Individual's health and welfare.</li> <li>✓ Incidents.</li> <li>✓ Individual's satisfaction with services and supports.</li> <li>✓ Quality of services and supports.</li> <li>✓ Appropriateness of proposed outcomes and identification of any barriers.</li> </ul>
7. Monitoring Outcome	Standards
<p>The outcome of the monitoring process is to identify, document and recommend resolutions to issues or comments resulting from the standards associated with the Monitoring Process.</p>	<p><b>Issues:</b> Any situation that warrants corrective action and timely response by an individual providing supports.</p> <p>Issues are:</p> <ul style="list-style-type: none"> <li>✓ Circumstances that negatively impact an individual's quality of life.</li> <li>✓ An individual is not receiving the appropriate quality, type, duration and frequency of services as identified in the ISP.</li> <li>✓ An individual is dissatisfied with the manner in which the services or supports are delivered.</li> </ul> <p>Comments are commendations, recommendations or anything unusual or noteworthy that may necessitate team attention but not immediate action.</p>

**Quality Improvement**

To promote quality in the delivery of Supports Coordination services, all stakeholders including individuals, families, providers, SCs, AEs and County Programs should have the ability

to share service and supports assessment information and use this information to provide better quality services and supports.

To promote the quality of Supports Coordination services, ODP will continue to work with the stakeholder community, including individuals, families, SCs, SCOs, AEs and County Programs, to evaluate Supports Coordination services and recommend policies and procedures designed to improve Supports Coordination services.

To promote quality in Supports Coordination, SCOs should:

- A. Assess the quality of Supports Coordination services on an ongoing basis.
- B. Provide SCs with the necessary tools and supports to function effectively.
- C. Encourage individual and family involvement in evaluation of Supports Coordination. For Waiver funded Supports Coordination, this can be accomplished through the implementation of the required *Pennsylvania Office of Development Programs Supports Coordination Satisfaction Survey*.
- D. Provide all external monitoring information relevant to the individual to the SC for consideration in the development and revision of the ISP.
- E. Assure follow-up with complaint resolution.
- F. Develop and, upon approval, implement any corrective action plan needed pursuant to AE Oversight Monitoring, the AE's waiver self-assessment monitoring, the SCO or other provider monitoring and other external assessments such as IM4Q.
- G. Complete the standard *Pennsylvania Office of Developmental Programs Supports Coordination Satisfaction Survey* as required and implement corrective action based on the results when providing Waiver-funded Supports Coordination.
- H. Maintain written records and reports as needed to support Quality Management.

To promote quality in services and supports and therefore the lives of the people whom they support, the SC should:

- A. Provide quality customer service, listen to what people need, help them plan for those needs, assist in choosing services and supports and routinely assure implementation of planned services.
- B. Be accessible to the individuals they serve and their families.
- C. Develop and help to implement ISPs that contain needed services and desired outcomes that enrich individual's lives.

D. Monitor supports and services to ensure that individuals are safe and that they are receiving needed and desired supports and services.

E. Maintain written records and reports as needed to support Quality Management.

**SCO Resources:**

- Appendix C of the current approved Consolidated and P/FDS Waivers for the Waiver-funded Supports Coordination Service definition and provider qualification criteria.
- The current, approved *Targeted Service Management Pennsylvania Medical Assistance State Plan Amendment* for TSM.
- 55 Pa.Code Chapter 6201.
- *The Electronic Resource Guide For Supports Coordinators and SC Supervisors* (05-19-09), PA Dept. of Public Welfare, Office of Developmental Programs, [www.odpconsulting.net](http://www.odpconsulting.net)