



Informational Memo

ISP Meeting Attendance – Provider Participation and Billing

ODP Communication Number: Memo 037-13

The mission of the Office of Developmental Programs is to support Pennsylvanians with developmental disabilities to achieve greater independence, choice and opportunity in their lives.

AUDIENCE: Individuals and Families, Service Providers, Administrative Entity (AE) Administrators and Directors, Supports Coordination Organization (SCO) Administrators or Directors, Supports Coordinators (SC), and Other Interested Parties

PURPOSE: To provide guidance regarding the intent and purpose of an Individual Support Plan (ISP) meeting and whether attending an ISP meeting is a billable unit of service.

BACKGROUND:

There are a number of documents that confirm the requirement that providers participate and/or attend ISP team meetings. This has resulted in questions regarding whether the time spent at an ISP team meeting by service providers is billable.

ODP has continued to reinforce the importance of team members' participation at the ISP team meeting in numerous documents.

Waiver Requirements

The Consolidated and Person/Family Directed Support (P/FDS) Waivers outline the Pennsylvania ISP plan development process. The standard waiver application template requires that the state provide a comprehensive description of the process that is used to develop the participant-centered service plan.

Appendix D, Participant-Centered Service Planning and Delivery, in the approved waivers specifies the following:

1. The ISP process involves collaboration between the individual, his or her family, friends, guardian, advocate, service provider(s) and other people important in the individual's life through written correspondence, telephone conversations, and/or face-to-face meetings.
2. A key step in developing a meaningful ISP is to gather information that reflects what is "important to" and "important for" the individual. Information should be gathered from the individual and those who know him or her best in order to gain and capture person centered information to determine the individual's preferences, strengths, and needs.
3. The Supports Coordinator (SC) collaborates with the individual, family, provider, agency and team to coordinate invitations and ISP meeting dates, times, and locations. The process of coordinating invitations includes the individual's and family's input as to whom to invite to the meeting(s). An ISP meeting involves bringing together people the individual would like to have involved in the planning process, truly listening to the individual, describing the individual as fully as possible with a true focus on understanding who he or she is, and dreaming and imagining with the individual of possible ways things could be different, both today and tomorrow.
4. The process starts with assessment and information gathering, followed by an ISP team meeting at which time the gathered information is reviewed, outcomes and outcome actions are developed, and needed services, supports, and providers are identified.
5. AEs are required to ensure that the SC develops the ISP based on a team meeting prior to the receipt of an individual's waiver services. Service providers participate in the assessment of the individual's needs, and the development of the ISP. Plan Regulations for licensed providers are found in 55 PA Code Chapters 6400, 6500, 2380, and 2390.
6. Waiver qualified providers of services are responsible to attend and participate in the Annual Review ISP meeting.

The waivers indicate that a provider agency is responsible for the following ISP roles and functions:

1. Participating in the assessment process
2. Completing assessments
3. Sharing information
4. Assuring information is in the completed ISP
5. Participating in ISP meetings

6. Implementing recommended services 7.
7. Reviewing ISP implementation

ISP Regulatory Requirements

Changes to 55 PA Code Chapters 6400, 6500, 2380 and 2390 that were effective August 28, 2010, have been in effect for a considerable period of time and remain basically unchanged:

- a) The plan team that shall participate in the development of the ISP includes the individual, the program specialist or family living specialist, the direct service worker for the licensed provider and other people the individual chooses to invite. (55 Pa. Code §§ 2380.184(a), 2390.154(a), 6400.184(a), 6500.154(a))
- b) The program specialist is the only plan team member that is required to attend the plan team meeting. (55 Pa. Code §§ 2380.33(b)(4), 2390.33(b)(4), 6400.44(b)(4), 6500.43(d)(4))
- c) At least three plan team members must be present for the ISP meeting. (55 Pa. Code §§ 2380.184(b), 2390.154(b), 6400.184(b), 6500.154(b))
- d) The individual receiving services has the choice to attend the meeting. (55 Pa. Code §§ 2380.184(b), 2390.154(b), 6400.184(b), 6500.154(b))

What Does all this Mean?

In order for the planning process to be successful, it requires the full participation of each team member. The purpose of an ISP meeting is to review assessment information, discuss progress on outcomes, share information and assist the individual in development of his/her outcomes and outcome actions for the upcoming plan year. All providers contribute to that discussion by ensuring that the SC has current information regarding their provision of services.

The SC is expected to notify *all* current providers of the annual review ISP team meeting. Unless the individual indicates otherwise, providers should participate in the meeting to ensure a thorough and rich discussion. If the participant indicates they do not want a specific provider to attend or participate, an effort should be made to find out why. Agency with Choice (AWC) providers can also designate the managing employer to represent them at the team meeting.

ODP encourages the use of technology to facilitate the participation of providers, such as telephone conferencing, Skype, etc. Meetings do not always need to be “in person”.

Providers of the following services are not *required* to attend the ISP meeting due to the nature of the service:

- Therapy services
- Respite (including respite camp)
- Transportation
- Home Accessibility Adaptations
- Vehicle Accessibility Adaptations
- Homemaker/Chore
- Specialized Supplies

If the individual requests the presence of one of the above providers or a discussion of specific information about the service is critical to the identification of needed services or modifications to an existing service, service outcomes or outcome actions, any one of the above service providers may be requested to participate in the ISP meeting and shall be expected to do so. Whether participating in the meeting or not, all providers must provide assessment, evaluation and other updated information to the SC.

Is Participation at a Team Meeting Billable?

Providers of service have asked if their attendance at a team meeting is billable. ***In most circumstances, attendance at a team meeting is not a billable activity.*** The Fiscal Year 13-14 fee schedule rates include costs for non-billable time (such as meetings, travel and participation in training).

The purpose of an ISP meeting is to review assessment information, discuss progress on outcomes, share information and assist the individual in development of their outcomes for the upcoming plan year. If a provider believes they are delivering a service consistent with the ISP and the waiver service definitions during an ISP team meeting, all the following conditions must apply in order for the activity to be billable:

- Both the individual and the provider's direct support staff or individual practitioners must be present.
- The support must be rendered according to the appropriate unit designation. For example, when a provider render services on a 15-minute unit basis, the unit of service is comprised of 15 minutes of continuous or non-continuous service within the same calendar day. The full 15 minutes of service does not need to be provided consecutively, but must be rendered within the same calendar day in order for a 15 minute unit of service to be billed.
- The required staffing level for the service as specified in the ISP is maintained.
- Documentation must substantiate billing for the service. Documentation must describe the nature and extent of the service(s) provided. (It is not sufficient to indicate that provider staff attended a team meeting.)

These same conditions apply when an SC participates in a meeting regarding an individual they support that is convened by another service system.

Questions regarding this communication should be directed to your appropriate Regional Program Manager.