Comments for Chapter 512 TBI Waiver Services

Effective Date: April 1, 2021

| <u>Number</u> | Date Received | Comment | Status Result |
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| 1 | 9/23/20 | As a Personal Attendant agency I am disheartened to see no changes to the reimbursement for the services my RNs provide. As discussed in the QI council meetings the PA agency should be reimbursed for the RN assessment and review of timesheets, as they are in the other programs. I can't understand why an PA agency RN is not required to complete her own assessment however is required to attend all meetings. The assessment guidelines and reimbursement should be the same across all programs. | No Change-Reimbursement for attendance at the Service Planning meeting by the Personal Attendant (PA) agency was not up for public comment at this time. This subject may be reviewed at another date. |
| 2 | 10/13/20 | Purpose of Amendment (page 2): "5. Added the requirement of a monthly Face to Face home visit by the Case Manager with the member to assure health and safety."; and, Appendix C: Participant Services: C-1/C-3: Service Specification (page 54): "CMs are required at make a monthly face to face home visit with the member and their court appointed legal guardian, if applicable." DRWV agrees with adding monthly face to face home visits as a requirement and feels as though this is a positive change for members. | No Change-Comment was in agreement with the Amendment. |
| 3 | 10/13/20 | Appendix B: Participant Access and Eligibility/B-2: Individual Cost Limit (2 of 2) (page 32): "A key Case Management function is to oversee the implementation of a member's services as outlined on their Service Plan. At a minimum, Case Managers must make monthly contact to review the implementation of the SP and address any | Change-The language was changed to coincide in both sections. |

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| | | identified issues or concerns. If unable to reach the person by telephone, the Case Manager must make a home visit."; and, Appendix C: Participant Services: C-1/C-3: Service Specification (page 54): "CMs are required at make a monthly face to face home visit with the member and their court appointed legal guardian, if applicable." DRWV recommends the language on page 32 be revised to coincide with that on page 54 to clarify that monthly face to face home visits are required. | |
| 4 | 10/13/20 | Appendix C: Participant Services C-1/C-3: Service Specification (page 54): "There is no case load limits for case managers." DRWV is concerned that without including a cap on caseloads, a Case Manager could have large caseloads if they are serving members participating in multiple Waiver programs. | No Change -Bureau for Medical Services (BMS) will monitor the size of caseloads through retro reviews and advise the agency to decrease if it appears the caseloads are too large to handle the workload. |
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