

 COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF AGING Harrisburg, PA 17101	PENNSYLVANIA DEPARTMENT OF AGING	
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AGING PROGRAM DIRECTIVE

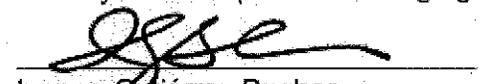
SUBJECT: GUIDELINES AND APPROVAL PROCESS FOR AUTHORIZATION OF ENVIRONMENTAL MODIFICATIONS AND ADAPTIONS IN THE PDA WAIVER PROGRAM

TO:

EXECUTIVE STAFF DIVISION OF CONTRACT MANAGEMENT AREA AGENCIES ON AGING PA ASSOCIATION OF AREA AGENCIES ON AGING	PA COUNCIL ON AGING DPW, OFFICE OF PROGRAM DEVELOPMENT & SUPPORT COMPTROLLER
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FROM:


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PURPOSE: The purpose of this Aging Program Directive (APD) is to amend the guidelines set forth in APD #05-01-14 regarding the approval process for environmental modifications and adaptations for PDA Waiver consumers. All guidelines remain intact with the exception of the \$2,000 limit for requests that must be reviewed by the Department of Aging (PDA). As of the issuance of this APD, AAAs must follow the process described in this APD for home modification requests that exceed \$6,000.

BACKGROUND: The PDA Waiver program is funded by Medicaid to enable individuals with limited income and resources to remain in a community setting and to receive home and community-based services rather than in a nursing care facility. Environmental modifications and adaptations can be a very important part of the care plan and are often necessary to maintain the health and safety of the consumer.

The policies and procedures regarding the PDA Waiver Program have been incorporated in the Home and Community Based Services (HCBS) Procedures Manual (APD #03-01-06), issued April 16, 2003. Chapter 4, pages 3-5 of APD #03-01-06 (HCBS Procedures Manual) outlines policies and procedures for environmental modifications and adaptations for PDA Waiver consumers. It does not provide, specific guidelines on appropriate modifications and adaptations or the level of expenditure.

Definitions

PDA Waiver Environmental Modifications

Those physical modifications or adaptations to the home, required by the recipient's care plan, which are necessary to ensure the health and safety of the individual, or which enable the individual to function with greater independence in the home and without which the recipient would require institutionalization.

AAAs should not approve modifications or adaptations for the purpose of improving the consumer's standard of living or increasing the value of his/her property. In this context, the service **excludes** modifications, adaptations, renovations or improvements to the home that do not provide a direct medical or remedial benefit to the Waiver consumer and/or that change the structural layout of the home.

The PDA Waiver is the payer of last resort. Before authorizing any home modification, the AAA must pursue the resources in its community for any major home repair or replacement. Although ADA is not a standard applicable to the home, for quality and the safety of consumers, PDA suggests that the AAA's use ADA standards wherever possible. Modifications or adaptations can be made to the homes of consumers, caregivers and properties leased by the consumer.

A. External Modifications or Adaptations

External modifications and adaptations that the AAA can generally approve include permanent or temporary devices to assist the consumer in exiting and entering the home to obtain needed medical services and other services outlined in the care plan. These include lifts and wheelchair ramps that extend to the middle of the yard and that may require a **cement pad** between the end of the ramp and the pickup point.

Examples of excluded external modifications or adaptations that the AAA **cannot** authorize:

- Roof replacements
- Installation of septic tanks

- Pavement of sidewalks (sidewalks that are not a part of the direct route from the doorway, ramp, etc. to a pickup point)
- Driveways
- Modifications of vehicles

B. Internal Modifications or Adaptations

The AAA can approve modifications or adaptations to the internal structure that include changes, which enable the individual to function with greater independence within his/her home. Examples include:

- Installation of grab-bars
- Widening of doorways
- Modification of bathroom facilities
- Installation of specialized electric and plumbing systems, which are necessary to accommodate the medical equipment and supplies needed for the health and safety of the recipient.

Examples of excluded internal modifications or adaptations that the AAA cannot authorize:

- Appliances (stoves and refrigerators)
- Utilities (heating oil)
- Elevators
- Rent
- Utilities
- Decorative work

Current standards require that each service delivery area have at least one coordinator/broker for this service. The coordinator/broker may be the AAA or some other designated coordinator/broker. PDA adopted procedures in 1996 regarding fees for coordination. The AAA, through its contract(s), may make modifications or adaptations where the consumer resides. The Department is requiring the following administrative procedures in addition to prior authorization of expenditures for Home Modifications and Adaptations.

Process

1. Justification for the Adaptation or Modification

a) The care plan manager must document and justify the adaptation or repair in the consumer's care plan. Current service standards require justification that address the following:

- Why is the work essential to the care plan?
- Is the service necessary for the consumer to remain in the community?
- How is the work necessary for continued safe living in the property by the consumer?
- Is the work essential for continued delivery of services in the home? Explain reasoning and rationale.
- Is the work expected to increase the consumer's independence or functioning? If so, in what way(s)?

b) In addition to the current service standards, the care manager must also document the following:

- The Coordinator/Broker obtained three bids for all home repairs and modifications.
- The effort to obtain three bids if the care manager was unable to do so.
- Price list information for small routine purchases of adaptations and assistive devices (that cannot be obtained through the regular state plan fee-for-service-list) with justification for the final vendor and product selected.

The AAA must attempt to make a comparison of at least three vendors. They must choose the product with the lowest price that meet state and local specifications.

- Justify reasonable expectation that the consumer will continue to live in the home in the near future. This may include discussions with family members, etc.

2. Review

Each AAA must define a process to review environmental modifications that exceed \$2,000 annually. This process **MUST** include a review committee, which includes the AAA Director, or his/her designee.

When annual anticipated expenditures exceed \$2,000, care managers (through their supervisor) must submit request(s) to the review committee. The request(s) must include a justification for the modification requested. These expenditures will be subject to the process outlined above if they are anticipated to exceed \$2,000.

If a review committee approves the care manager's request for the home modifications or adaptations that exceed \$6,000, it must seek approval from the Department of Aging (through the review committee) and complete a Request for Approval of Environmental Modification form (attached). The completed form can be electronically submitted to the clinical consultant with a copy to the Division Chief, Clinical Consultation and Quality Assurance Division. Copies of all bids must accompany the form. The AAA Director must sign the form indicating his/her review and approval.

In an emergency (an allowable item that, in the absence of its immediate purchase, would require that the consumer be placed in a nursing facility), the situation should be carefully documented. The AAA must refer the justification and documented evidence of the emergency to PDA staff person during the next business day.

3. Standards

There will be at least one coordinator for environmental modifications in each service delivery area. It may be the local AAA or some other designated coordinator as recommended and approved by PDA and MA.

a) Role of Care Manager

- Identifies and/or verifies the need for modifications and adaptations with the consumer and the family.
- Reviews the repair, modification or adaptation request to assure it is within the larger framework of the consumer's health and safety.
- Seeks the lowest effective cost alternative whenever possible.
- Appropriately refers the consumer to other available community-based services.

b) Repairs of Existing Modifications or Adaptations

- All major repairs must conform to the local area's building codes (or Building Officials and Code Administrators (BOCA) International, Inc., if appropriate) and the contractor must obtain all required licenses and permits.
- To ensure the safety of the consumer, professionals (physical therapist, occupational therapist, etc.) must participate in the planning of major modifications or adaptations that are beyond the expertise of the care manager, in conjunction with the consumer and the family.

c) Guarantees

- The owner of the property must approve the work, in writing, prior to the start of the environmental modification. An agreement must list the responsibilities of the consumer/owner and the responsibilities and expectations of the contractor. Bids must include appropriate costs associated with an independent, final inspection for quality workmanship and compliance with codes and the ADA (if appropriate). Guarantees for workmanship must follow industry standards.

d) Property Ownership

Reimbursement of a home modification to a rented property is permitted when the following minimum standards are met:

- There is a reasonable expectation that the consumer will continue to live in the home.
- The modification or adaptation is **not** the responsibility of the landlord.
- Permission is secured for the home modification from the property owner.
- Documentation exists to demonstrate whether the property owner requires the home to be returned to its original state when the consumer moves out.
- A rent increase will not result because of repairs paid by the Waiver.

4. Quality Assurance

- a) AAAs must develop and implement an inspection process to certify appropriate completion of the modification or adaptation.
- b) AAAs must develop and conduct satisfaction surveys that document the level of consumer satisfaction with the home modification or adaptation.
- c) AAAs must document the modification or adaptation in SAMS using the ACTIONS feature.

PLEASE NOTE:

AAA staff completing service orders for modifications or adaptations must thoroughly describe, in the Special Instructions on the service order, the specific

modification or adaptation that they are ordering. If the modifications or adaptations exceed \$6,000, the care manager must document, in the Special Instructions on the service order, the date they obtained approval from PDA.

PDA will direct the AAA to repay Medicaid, through County funds, if a AAA-approved modification or adaptation did not receive formal approval from PDA and/or fit the criteria outlined in this policy.

Please contact Dennis DeSantis with any questions (regarding the Guidelines for Environmental Modifications set forth by this APD) at (717) 783-6207 or ddesantis@state.pa.us.