

## Coronavirus Disease 2019 (COVID-19): Retainer Payments for Community Participation Supports (CPS) ODP Announcement 20-031

### AUDIENCE:

Community Participation Supports (CPS) Providers

### PURPOSE:

This communication outlines the process for retainer payments made to CPS providers during the response to COVID-19.

### DISCUSSION:

The Office of Developmental Programs (ODP) included **Retainer Payments for Community Participation Supports (CPS)** in Appendix K to help ensure the long-term stability of this essential service. The following details offer additional information to providers for planning purposes:

#### **How will retainer payments be distributed?**

- Gross adjustments through PROMISe.
- Begin the week of 3/30/2020.
- Distributed monthly.
- Will continue until further notice.
- CPS providers do not need to request retainer payments. All CPS providers will receive monthly retainers.
- The first retainer payment will cover 3/11/20 (pro-rated for effective date of Appendix K) through 3/31/20.
- For providers with multiple service locations, gross adjustments will be applied to the service location which had the highest level of CPS billing this fiscal year through February 29.

#### **How was the retainer payment calculated?**

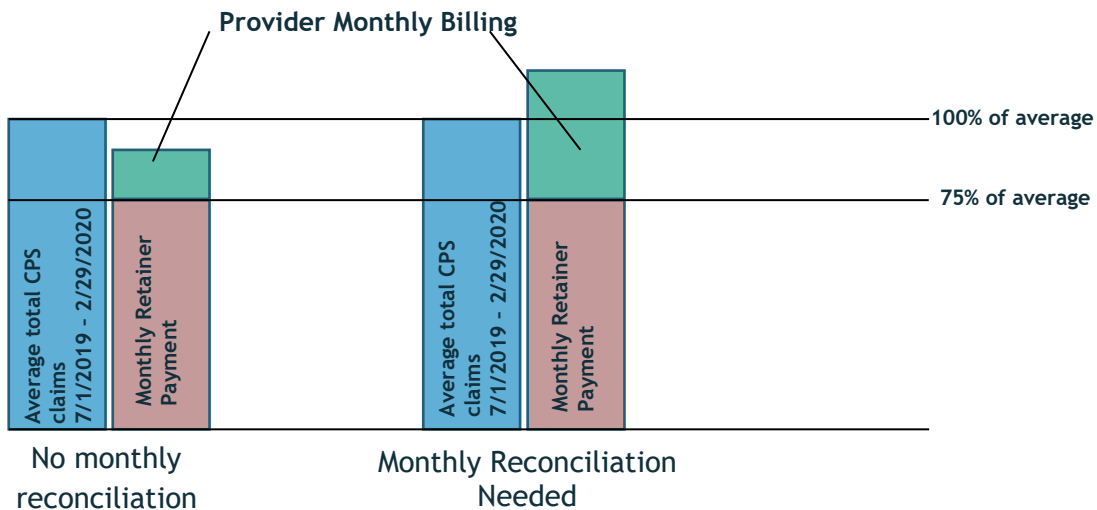
Retainer payments were calculated at 75% of the monthly average of the total CPS claims submitted 7/1/2019 – 2/29/2020.

The Centers for Medicare and Medicaid Services (CMS) requires that retainer payments are not duplicative of services provided during the timeframe covered by the retainer payment.

**Reconciliation**

Upon lifting the closure order for Older Adult, Adult Training and Prevocational facilities, ODP is required to conduct an analysis and reconciliation where needed to ensure that no duplicate payments have been made.

- Retainer payments are allowable in circumstances in which utilization for the CPS service location drops below 75% of annual monthly average 7/1/19 to 2/29/2020.
- Post COVID-19 response, ODP will ensure that no duplicative payments were made through the following logic:
  - For each month for which a retainer payment was made, providers (by MPI) that provided CPS at 25% or greater than the average monthly units billed between 7/2019 and 2/2020, will be subject to an adjustment/reconciliation.
  - Reconciliation calculation: Aggregate monthly units beyond 25% of prior monthly average utilization (7/1-2/28/2020) by MPI provided during the time period will be deducted from the total retainer payments at the rates in effect 7/1/19 – 3/10/2020.



Questions regarding these payments may be addressed via e-mail to Rick Smith (riesmit@pa.gov).