

Application for

Section 1915(b) (4) Waiver

Fee-for-Service

Selective Contracting Program

July 12, 2024

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Application for Section 1915(b) (4) Waiver Fee-for-Service (FFS) Selective Contracting Program

Facesheet

The **State** of Delaware requests a waiver/amendment under the authority of section 1915(b) of the Act. The Medicaid agency will directly operate the waiver.

The **name of the waiver program** is Pathways to Employment.
(List each program name if the waiver authorizes more than one program.).

Type of request. This is:

- an initial request for new waiver. All sections are filled.
- a request to amend an existing waiver, which modifies Section/Part _____
- a renewal request

Section A is:

- replaced in full
- carried over with no changes
- changes noted in **BOLD**.

Section B is:

- replaced in full
- changes noted in **BOLD**.

Effective Dates: This waiver/renewal/amendment is requested for a period of 5 years beginning 07/01/2024 and ending 06/30/2029.

State Contact: The State contact person for this waiver is Larry Pusey and can be reached by telephone at (302) 744-9714, or e-mail at Larry.Pusey@delaware.gov. (List for each program)

Section A – Waiver Program Description

Part I: Program Overview

Tribal Consultation:

Describe the efforts the State has made to ensure that Federally-recognized tribes in the State are aware of and have had the opportunity to comment on this waiver proposal.

There are no federally recognized tribes in Delaware.

Program Description:

Provide a brief description of the proposed selective contracting program or, if this is a request to amend an existing selective contracting waiver, the history of and changes requested to the existing program. Please include the estimated number of enrollees served throughout the waiver.

Delaware has operated the Pathways to Employment (Pathways) program through a 1915(i) home and community-based State Plan Amendment (SPA) since January 1, 2015. The Pathways program expands choices and opportunities by offering individually tailored employment support services to persons with visual impairments, physical disabilities, intellectual disabilities, Autism Spectrum Disorder, and Asperger’s Syndrome.

Pathways targets individuals who meet the eligibility criteria specified in the Pathways SPA:

- at least 14 years of age,
- meet defined needs-based criteria, and
- have a desire to work in a competitive work environment.

The following chart provides an estimate of the number of persons projected to be served for each year of the program.

| Annual Period | From | To | Projected Number of Participants |
|---------------|-----------------|---------------|----------------------------------|
| Year 1 | January 1, 2025 | June 30, 2025 | 705 |
| Year 2 | January 1, 2025 | June 30, 2026 | 780 |
| Year 3 | January 1, 2026 | June 30, 2027 | 855 |
| Year 4 | January 1, 2027 | June 30, 2028 | 930 |
| Year 5 | January 1, 2028 | June 30, 2029 | 1005 |

Delaware offers the following Pathways services to program participants:

- Employment Navigation
- Financial Coaching Plus
- Benefits Counseling
- Non-Medical Transportation
- Orientation, Mobility, and Assistive Technology

- Career Exploration and Assessment
- Small Group Supported Employment
- Individual Supported Employment
- Personal Care (including option for self-direction)

Waiver Services:

Please list all existing State Plan services the State will provide through this selective contracting waiver.

This waiver seeks to limit freedom of choice of providers of the Employment Navigation service and to selectively contract a transportation broker to provide the non-medical transportation services to Pathways program participants.

To ensure conflict-free evaluation, assessment, and service plan monitoring in the Pathways program, Delaware has developed an Employment Navigation service. Because of the critical role this conflict-free entity plays in the delivery of 1915(i) HCBS SPA services, Delaware believes it is important to limit the providers of Employment Navigation services to ensure the requisite skill set and to ensure that providers are free from all conflict.

Delaware has developed a comprehensive non-medical transportation benefit and believes it is important to have the program administered by a single statewide transportation broker.

Delaware is a small state with limited resources. Limiting the number of providers allows for greater program efficiencies.

Program details regarding the Employment Navigation and non-medical transportation services are described in the Pathways 1915(i) HCBS SPA.

A. Statutory Authority

1. **Waiver Authority.** The State is seeking authority under the following subsection of 1915(b):

 X **1915(b) (4) – FFS Selective Contracting program**

2. **Sections Waived.** The State requests a waiver of these sections of 1902 of the Social Security Act:

- a. **Section 1902(a) (1) – Statewideness**
- b. **Section 1902(a) (10) (B) – Comparability of Services**
- c. X **Section 1902(a) (23) – Freedom of Choice**
- d. **Other Sections of 1902 – (please specify)**

B. Delivery Systems

1. **Reimbursement.** Payment for the selective contracting program is:

the same as stipulated in the State Plan

is different than stipulated in the State Plan (please describe)

Employment Navigation

With the approval of the Pathways 1915(i) HCBS SPA, Employment Navigation will be covered under the State Plan. Reimbursement for Employment Navigation services is based on a fee schedule. Employment Navigators will be reimbursed for a month's provision of service for each participant enrolled for any portion of the month.

Non-Medical Transportation

The state will contract with a single statewide transportation broker to provide non-medical transportation services. The state will reimburse transportation services on a fee-for-service (FFS) basis and cover the cost of providing all authorized transportation services plus an administrative fee for the broker's coordination functions.

2. **Procurement.** The State will select the contractor in the following manner:

Competitive procurement

Open cooperative procurement

Sole source procurement

Other (please describe)

Employment Navigation

Employment Navigators are limited to state employees meeting specified qualifications. Specifically, Employment Navigators must:

- Have an associate degree or higher in a behavioral, social sciences, or a related field OR experience in health or human services support which includes interviewing individuals and assessing personal, health, employment, social, or financial needs in accordance with program requirements.
- Complete training required by the Delaware Department of Health and Social Services including training on the participant's service plan and the participant's unique and/or disability-specific needs which may include communication, mobility, and behavioral needs.
- Comply with other requirements as determined by the Delaware Department of Health and Social Services.

Non-Medical Transportation

Currently the State contracts with a single statewide transportation broker to coordinate non-emergency medical transportation services under the State's Medicaid program. The existing transportation broker contract includes non-medical transportation services

resulting in a uniform, consistent approach to all Medicaid transportation services across the state. This waiver renewal continues the existing procurement method.

B. Restriction of Freedom of Choice

1. Provider Limitations.

- Beneficiaries will be limited to a single provider in their service area.
 Beneficiaries will be given a choice of providers in their service area.

(NOTE: Please indicate the area(s) of the State where the waiver program will be implemented)

Employment Navigation

Employment Navigators are state employees of the Division of Developmental Disabilities Services. Employment Navigators will be assigned to participants in accordance with their disability. Delaware offers Employment Navigation services statewide.

Non-Medical Transportation

The state contracts with a single statewide transportation broker to coordinate non-medical transportation services under the state's Medicaid program. Delaware offers Non-Medical Transportation services statewide.

2. State Standards.

Detail any difference between the state standards that will be applied under this waiver and those detailed in the State Plan coverage or reimbursement documents .

Employment Navigation

With the renewal of the Pathways 1915(i) HCBS SPA, Employment Navigation will continue to be a service covered under the State Plan.

Non-Medical Transportation

The State Plan addresses coverage of non-emergency medical transportation for medical services. This waiver request is limited to non-medical transportation services for persons participating in the Pathways program. Additionally, different from the State Plan, reimbursement for non-medical transportation services will be on a FFS basis and not through a prospective payment methodology.

The existing transportation broker contract specifies the terms and conditions for service delivery. These standards will also apply to non-medical transportation services provided by the contractor. The contract adds additional requirements appropriate for HCBS participants, including but not limited to the following:

- The contractor cannot deny HCBS transportation services pursuant to any policy that imposes a blanket restriction due to a participant’s condition or disability. Any decision to deny services should be made on a case-by-case basis.
- Additional considerations will need to be taken into consideration when determining the appropriateness of public transportation for HCBS participants:
 - Public transportation should only be considered when the participant’s level of need supports the use of public transportation as an appropriate transport option and/or the participant states that he/she is physically and mentally able to use public transportation.
 - Public transportation will not be considered when:
 - Participant is traveling with an infant under six months old.
 - Public transportation (e.g., bus, train, etc.) is not operational on day and/or time of appointment.
 - Participant is age 70 years or older.
 - Participant uses a walker, crutches and/or a cane.
- Allowing for adapted transportation in modified vehicles (such as vehicles with wheelchair or stretcher safe travel systems or lifts) that meet the participant’s medical needs when the use of a standard passenger vehicle is not possible.

C. Populations Affected by Waiver

(May be modified as needed to fit the State’s specific circumstances)

1. **Included Populations.** The following populations are included in the waiver:

- ___ Section 1931 Children and Related Populations
- ___ Section 1931 Adults and Related Populations
- ___ Blind/Disabled Adults and Related Populations
- ___ Blind/Disabled Children and Related Populations
- ___ Aged and Related Populations
- ___ Foster Care Children
- ___ Title XXI CHIP Children
- X Other
- Participants enrolled in the Pathways program.

2. **Excluded Populations.** Indicate if any of the following populations are excluded from participating in the waiver:

- ___ Dual Eligibles
- ___ Poverty Level Pregnant Women
- ___ Individuals with other insurance
- X Individuals residing in a nursing facility or ICF/MR
- ___ Individuals enrolled in a managed care program
- ___ Individuals participating in a HCBS Waiver program
- ___ American Indians/Alaskan Natives

- Special Needs Children (State Defined). Please provide this definition.
- Individuals receiving retroactive eligibility
- Other (Please define):
Any person who does not meet the targeting and needs-based criteria specified in the Pathways SPA.

Part II: Access, Provider Capacity and Utilization Standards

A. Timely Access Standards

Describe the standard that the State will adopt (or if this is a renewal or amendment of an existing selective contracting waiver, provide evidence that the State has adopted) defining timely Medicaid beneficiary access to the contracted services, *i.e.*, what constitutes timely access to the service?

1. How does the State measure (or propose to measure) the timeliness of Medicaid beneficiary access to the services covered under the selective contracting program?

Employment Navigation

The state has established specific timeframes for various functions performed by Employment Navigators. These timeframes ensure that Pathways participants have timely access to services and supports. The timeframes will address at a minimum:

- Number of days following referral and/or notification of assignment that Employment Navigator must contact Pathways participant.
- Number of days following referral and/or notification of assignment that a needs assessment must be conducted and a service plan developed.
- Number of days following service plan development services must be authorized.

Non-Medical Transportation

The transportation broker contract specifies timeframes for non-urgent service delivery as well as pickup and delivery standards as follows:

- Non-urgent requests must be scheduled 2 days in advance.
- Pickup must be made within 45 minutes of the contractor receiving notice that the appointment is completed.
- Any deviation from the stated time of more than fifteen (15) minutes is not acceptable as timely service.
- In multiple-load situations, a participant shall not be forced to remain in the vehicle more than forty-five (45) minutes longer than the average travel time for direct transport from point of pick-up to destination.

The transportation broker must consider the current level of mobility and functional independence of the participant in determining the most appropriate mode of transportation needed by the participant. This information is captured by the Employment Navigator during the assessment of needs process and passed along to

the transportation broker along with other relevant information regarding the frequency, scope, and duration of transportation services.

2. Describe the remedies the State has or will put in place in the event that Medicaid beneficiaries are unable to access the contracted service in a timely fashion.

Employment Navigation

Supervisors will conduct ongoing monitoring of Employment Navigator performance using monitoring reports, reviews of service plans adequacy and dates of completion, complaints, and service utilization. Remedies such as additional training, mentoring, and, to the extent possible, caseload adjustments and reassignments may be utilized to address identified issues. Additional Employment Navigators may also be added if determined necessary.

Non-Medical Transportation

Employment Navigators will regularly monitor service delivery and timely receipt of services. If issues are identified, Employment Navigators will consider short-term solutions such as looking to the participant's support network (e.g. friends, family members, neighbors, caregivers) to provide services. Volunteers will also be sought to fill gaps in service coverage.

The state will bring to the transportation broker's attention any identified issues. A corrective action plan may be imposed for issues that cannot be addressed timely.

If the transportation broker fails to comply with any specified requirements, the state may impose monthly financial penalties up to \$1,000.00 per incident. Additionally, civil monetary penalties may also be imposed for poor performance.

Ultimately, if the violations are considered egregious and persistent, the transportation broker contract may be terminated, and a new contractor sought for service delivery.

B. Provider Capacity Standards

Describe how the State will ensure (or if this is a renewal or amendment of an existing selective contracting waiver, provide evidence that the State has ensured) that its selective contracting program provides a sufficient supply of contracted providers to meet Medicaid beneficiaries' needs.

1. Provide a detailed capacity analysis of the number of providers (e.g., by type, or number of beds for facility-based programs), or vehicles (by type, per contractor for non-emergency transportation programs), needed per location or region to assure sufficient capacity under the selective contracting program.

Employment Navigation

Currently there are 10 Full-Time Employment Navigators and **1 part-time or Casual/Seasonal Employment Navigator** available to support the Pathways program. Full-Time Employment Navigators allow for a 1:60 Employment Navigator to participant ratio, **whereas the Casual/Seasonal Employment Navigator allows for a 1:40 Employment Navigator to participant ratio.**

Non-Medical Transportation

Annually, the transportation broker must demonstrate that the transportation provider network provides adequate access to services in each county in the state, based on the number of recipients and the number of trips provided. If the contractor or the state identifies insufficient transportation resources in a region, the contractor shall develop and implement a provider recruitment plan to develop sufficient resources to meet the transportation needs of Medicaid recipients in the geographical areas covered within 10 days.

The transportation broker must ensure that non-medical transportation services are provided which comply with the following minimum service delivery requirements. These requirements must also be delineated in all transportation service agreements:

- On-time arrival for scheduled pick-up shall be a standard practice. Arrival before the scheduled pick-up time is permitted; however, a participant cannot be required to board the vehicle before the scheduled pick-up time. The driver is not required to wait more than ten (10) minutes after the scheduled pick up time.
- Drivers shall deliver participants to their destinations on time for their scheduled appointments.
- Late arrival will be reported to the dispatcher/transportation provider for the purpose of notifying the direct medical service provider of the late arrival.
- Trips will be monitored to ensure clients are delivered to their homes in timely manner from appointments.
- If a delay occurs while picking up scheduled riders, the dispatcher/provider must contact proposed riders at their pickup points to inform them of the delay in arrival of vehicle and related schedule. The transportation provider must advise scheduled riders of alternate pick-up arrangements when appropriate.
- The provider shall assure that the participant is returned to their agreed point of origin.

2. Describe how the State will evaluate and ensure on an ongoing basis that providers are appropriately distributed throughout the geographic regions covered by the selective contracting program so that Medicaid beneficiaries have sufficient and timely access throughout the regions affected by the program.

Employment Navigation

The Pathways Steering Committee will monitor the adequacy of Employment Navigation capacity through reports generated by the operating Division (e.g. utilization, complaints, and program enrollment). Additional Employment Navigators may also be added if determined necessary.

Non-Medical Transportation

On a quarterly basis, the contractor must provide a current list of its provider network to the state with additions and terminations of providers listed with the reason for each termination. This report is analyzed to determine the adequacy of provider availability in all areas of the state.

C. Utilization Standards

Describe the State's utilization standards specific to the selective contracting program.

1. How will the State (or if this is a renewal or amendment of an existing selective contracting waiver, provide evidence that the State) regularly monitor(s) the selective contracting program to determine appropriate Medicaid beneficiary utilization, as defined by the utilization standard described above?

Employment Navigation

The state believes that the availability of an Employment Navigator benefit will assist Pathways participants in gaining access to needed employment services and supports. As such, the Pathways Steering Committee will review Employment Navigator service utilization and performance, as well as utilization of all other Pathways programs as part of its ongoing monitoring functions.

Non-Medical Transportation

On a monthly and annual basis, the transportation broker will submit a report noting the number of trips, number of unduplicated clients, and the total number of miles, broken out by mode of transportation service provided.

2. Describe the remedies the State has or will put in place in the event that Medicaid beneficiary utilization falls below the utilization standards described above.

Employment Navigation

Remedies such as additional training, mentoring, and, to the extent possible, caseloads adjustments and reassignments may be implemented to address identified issues. Additional Employment Navigators may also be added if determined necessary.

Non-Medical Transportation

The state will bring to the transportation broker's attention any identified issues. A corrective action plan may be imposed for issues that cannot be addressed in a timely manner.

If the transportation broker fails to comply with any of the requirements of the contract, the state may impose monthly financial penalties up to \$1,000.00 per

incident. Additionally, civil monetary penalties may also be imposed for poor performance.

Ultimately, if the violations are considered egregious and persistent, the transportation broker contract may be terminated, and a new contractor sought for service delivery.

Part III: Quality

D. Quality Standards and Contract Monitoring

1. Describe the State's quality measurement standards specific to the selective contracting program.
 - a. Describe how the State will (or if this is a renewal or amendment of an existing selective contracting waiver, provide evidence that the State):
 - i. Regularly monitor(s) the contracted providers to determine compliance with the State's quality standards for the selective contracting program.

Employment Navigation

A strong Employment Navigator benefit is critical to the success of Pathways. As a result, the state implements several quality standards to determine the effectiveness of the benefit, including but not limited to:

- Provider performance commensurate with the level and quality of expected performance.
- Initial and ongoing training requirements.
- Monitoring of outcomes at the supervisory level and by the Pathways Steering Committee.
- Performance measures that address the important functions performed by Employment Navigators such as:
 - Number and /or percent of participants with service plans consistent with their individual assessments.
 - The percentage of participants whose service plan contains documentation that the participant was supported to make an informed choice about their providers(s).

Non-Medical Transportation

In addition to the utilization reports noted previously, several additional requirements are specified in the existing transportation broker contract that enables the state to monitor the quality and performance of the service delivery. These standards include:

- Detailed reporting via encounter data submissions that assess performance in areas such as:
 - timely response to client inquiries,

- timely reply to telephone traffic,
- correct determination and selection of mode of transportation,
- proper and timely handling of client fair hearing requests, and
- reporting of customer satisfaction.
- Development of a performance monitoring plan that addresses how the transportation broker will monitor, at a minimum, the following measures:
 - on-street observations,
 - random audit of existing rides performed (minimum 10% of trips),
 - accident/incident reporting,
 - statistical reporting of trip characteristics,
 - analysis of complaints, including the tracking and investigating of complaints and disposition of the cases,
 - Driver and attendant licensure, driving record, background checks, experience, and appropriate driver training,
 - client safety,
 - completion of driver logs and inspection of manifests,
 - vehicle inspections, insurance coverage, maintenance, etc., and
 - monitoring of on-time performance.
- The state has the discretion to collect additional data to develop and widely distribute broker and transportation provider report cards. The data to be collected includes, but is not limited to:
 - number of trips provided by type of transportation/by county,
 - number of trips provided by transportation provider/by county,
 - number of clients served/by county,
 - number of requests for transportation denied by reason/by county,
 - average number of phone calls received daily,
 - average number of phone calls abandoned daily,
 - average “on hold” time,
 - percentage of pick-ups and deliveries completed on time, and
 - number and type of complaints.

ii. Take(s) corrective action if there is a failure to comply.

Employment Navigation

Remedies such as additional training, mentoring, and, to the extent possible, caseload adjustments and reassignments may be implemented to address identified issues. Additional Employment Navigators may also be added if determined necessary.

Non-Medical Transportation

The state has several tools available to address a transportation broker’s failure to comply with requirements. The tools include the following.

- The state will bring to the transportation broker’s attention any identified issues. A corrective action plan may be imposed for issues that cannot be addressed timely.

- If the transportation broker fails to comply with any of the requirements of the contract, the State may impose monthly financial penalties up to \$1,000.00 per incident. Additionally, civil monetary penalties may also be imposed for poor performance.
 - Ultimately, if the violations are considered egregious and persistent, the transportation broker contract may be terminated, and a new contractor sought for service delivery.
2. Describe the State’s contract monitoring process specific to the selective contracting program.
- a. Describe how the State will (or if this is a renewal or amendment of an existing selective contracting waiver, provide evidence that the State):
- i. Regularly monitor(s) the contracted providers to determine compliance with the contractual requirements of the selective contracting program.

Employment Navigation

The Pathways Steering Committee monitors the overall effectiveness of the Employment Navigation benefit as well as all other components of the Pathways program. Reports generated by the operating Divisions will be reviewed to determine issues, trends, and gaps in service provision. The Pathways Steering Committee will forward identified issues to the Division of Medicaid and Medical Assistance contract manager for resolution.

Non-Medical Transportation

In addition to the monitoring requirements noted above, the transportation broker contract requires the state to monitor:

- Staffing levels, including drivers and their training, which may include announced and unannounced visits to observe driver training programs.
- Review inspection of vehicle and maintenance reports.
- Inspect driver records to ensure that proper training has been provided.
- Announced and unannounced visits to ensure regulatory compliance.
- Monitoring utilization reports noted above and complaint reports.

- ii. Take(s) corrective action if there is a failure to comply.

Employment Navigation

Remedies such as additional training, mentoring, and, to the extent possible, caseloads adjustments and reassignments may be implemented to address identified issues. Additional Employment Navigators may also be added if determined necessary.

Non-Medical Transportation

The state has several tools available to address a transportation broker's failure to comply with requirements. The tools include the following.

- The state will bring to the transportation broker's attention any identified issues. A corrective action plan may be imposed for issues that cannot be addressed timely.
- If the transportation broker fails to comply with any of the requirements of the contract, the state may impose monthly financial penalties up to \$1,000.00 per incident. Additionally, civil monetary penalties may also be imposed for poor performance.
- Ultimately, if the violations are considered egregious and persistent, the transportation broker contract may be terminated, and a new contractor sought for service delivery.

E. Coordination and Continuity of Care Standards

Describe how the State assures that coordination and continuity of care is not negatively impacted by the selective contracting program.

Employment Navigation

The Pathways Steering Committee monitors the overall effectiveness of Pathways, including the extent to which selective contracting has a negative impact on coordination and continuity of care.

Non-Medical Transportation

Employment Navigators conduct regular and ongoing monitoring of the health and welfare of participants and of service delivery in accordance with the participant's person-centered service plan. Therefore, Employment Navigators are the first line of defense in ensuring that selective contracting for transportation does not negatively impact the ability of participants in the Pathways program to access needed services.

Part IV: Program Operations

F. Beneficiary Information

Describe how beneficiaries will get information about the selective contracting program.

Several resources will be used to provide information to participants regarding Employment Navigation services and transportation services. Information regarding the Pathways program, including the Employment Navigation benefit and accessing services through the transportation broker will be included in written informational materials describing the program and will be available via the Pathways website. Additionally, as part of the assessment of need and plan of care development process, Employment Navigators will

provide information to participants about transportation services and how to access services through the transportation broker, both verbally and in written format.

G. Individuals with Special Needs.

- The State has special processes in place for persons with special needs (Please provide detail).

The Pathways program targets individuals with special needs – visual impairments, physical disabilities including brain injury, and intellectual disabilities including Autism Spectrum Disorder. Therefore, this waiver provides special processes to support employment and transportation services for eligible individuals. The population targeted by the Pathways program are served by the Division of Developmental Disabilities Services under a 1915(i) SPA and a Memorandum of Understanding with the Division of Medicaid and Medical Assistance, the designated State Medicaid Agency within Delaware. These clients receive all beneficiary information as described above along with their Employment Navigation and non-medical transportation services. These clients maintain direct access to their comprehensive health care benefits provided under the State Plan including primary care providers and specialists, etc., as needed for their individual health care conditions. The necessary medical services and access to care are assured through the State Plan and the state’s 1115 waiver.

Section B – Waiver Cost-Effectiveness & Efficiency

Efficient and economic provision of covered care and services:

1. Provide a description of the State’s efficient and economic provision of covered care and services.

Under the 1915(i) Pathways program, Employment Navigators assist beneficiaries in accessing needed employment and related supports. This service ensures coordination between employment and related supports and other State Plan services, as well as medical, social, educational, and other services, regardless of the funding source for the services to which access is gained. Employment Navigators are responsible for collecting information for evaluating and/or re-evaluating the individual’s needs-based eligibility and for performing assessments to inform the development of the person-centered employment plan.

Restricting case management in the 1915(i) to state employees is critical due to the current service infrastructure, their knowledge of local resources, their proximity to beneficiaries and providers to arrange and monitor services, and the stability of one entity being responsible for all aspects of case management.

By utilizing a single entity for Employment Navigation, DDDS will minimize duplication of services and streamline communication. With DDDS responsible for all aspects of case

management for Pathways to Employment the collaboration of multiple community stakeholders and coordination of services is more efficient and person-centered.

Delaware has limited options for affordable public transportation to allow beneficiaries to gain access to employment services, as specified by their service plan. This service is offered in addition to medical transportation required under 42 CFR §431.53 and transportation services under the State plan, defined at 42 CFR §440.170(a) (if applicable), and does not replace them. Transportation services under the Pathways program are offered in accordance with the participant's service plan. Whenever possible and as determined through the person-centered planning process, family, neighbors, friends, carpools, coworkers, or community agencies which can provide this service without charge must be utilized.

To be approved, non-medical transportation must be directly related to a supported employment goal on the individual's Employment Plan and not for the general transportation needs of the client such as regular trips to the grocery store. Transportation services will be delivered through a transportation broker that will arrange and/or provide services pursuant to the plan of care. Such transportation may also include public transportation. When appropriate, utilizing public transportation under the Pathways program promotes self-determination and can present a cost-effective means of accessing services and activities.

Projected Waiver Costs and Projected Pre-Waiver Costs and related trend rates for the renewal period were determined as described below.

Employment Navigation:

The Projected Waiver Costs were developed as follows:

Cost per Unit: Compute a *Projected Waiver* weekly rate for the Employment Navigation service by using the approved methodology from the Pathways SPA **and adding 2% to the Employment Navigator salary each year. This is consistent with recent state employee pay raises and with the current appropriation through the State of Delaware's Budget Act for SFY25.**

Number of Recipients: Assume an additional **75** net new Pathways clients each year based on historical program growth in **CYs, 22 and 23 (Data from last 2 complete CY's).**

Units per Recipient: Assume 12 weekly billable units per recipient per year.

Multiply the projected number of annual recipients by the projected annual units per person by the Projected Waiver weekly rate to compute the total cost per year. For the Employment Navigation Service. The difference in projected total cost from year to year is the aggregate trend rate that includes growth in the cost per unit and the number of units. The units per person was not assumed to change from year to year.

The Projected Pre-Waiver Costs were developed as follows:

Cost per Unit: Compute a *Projected Pre-Waiver* weekly rate for the Employment Navigation service using the approved methodology from the Pathways SPA and substituting the average base salary for Case Managers in Delaware from the Glass Door website for the DDDS Health/Human Services Case Manager state classification that DDDS uses to compute the Employment Navigation rate. According to the website, this data was last updated on October 29, 2023. Trend the salary forward each year using the average wage growth for small businesses for the past 12 months from the “Small Business Employment Watch” index from the website: paychex.com and compute new weekly “pre-waiver” Employment Navigation rate for each year.

Number of Recipients: Assume an additional **75** net new Pathways clients each year based on historical program growth in **CYs, 22 and 23 (Data from last 2 complete CY’s)**.

Units per Recipient: Assume 12 weekly billable units per recipient per year.

Multiply the projected number of annual recipients by the projected annual units per person by the Projected Waiver weekly rate to compute the total cost per year. For the Employment Navigation Service. The difference in projected total cost from year to year is the aggregate trend rate that includes growth in the cost per unit and the number of units. The units per person was not assumed to change from year to year.

Non-Medical Transportation:

The Projected Waiver Costs were developed as follows:

Cost per Unit: Compute a *Projected Waiver* average cost per trip for the Transportation service using actual cost and trip counts from **CY 23**, the most recent year for which completed data is available. Apply a trend factor to account for increases in the cost of delivering the service. Based on the assumption that the largest operating cost component for the delivery of transportation is the staff cost, Delaware used the same average wage growth for small businesses for the past 12 months from the “Small Business Employment Watch” index from the website: paychex.com as it’s used for the Employment Navigation Projected Pre-Waiver Cost.

Number of Recipients: Assume an additional **75** net new Pathways clients each year based on historical program growth in **CYs, 22 and 23 (Data from last 2 complete CY’s)**.

Trips per Recipient per Year: Assume that half of the new members (**38**) will need transportation @ an average of 20 trips per person per year based upon on **CY23** actual data, the most recent year for which complete data is available.

Multiply the projected number of annual recipients expected to use transportation by the projected annual trips per person by the Projected Waiver average cost per trip to compute the total cost per year for the Transportation Service. The difference in projected total cost from year to year is the aggregate trend rate that includes growth in the cost per unit and the number of units. The units per person was not assumed to change from year to year.

The Projected Pre-Waiver Costs were developed as follows:

Cost per Unit: For the *Projected Pre-Waiver* costs for the Transportation service, use the published fee schedule for A&D Transportation, which specializes in transportation of individuals with intellectual and developmental disabilities. The fee schedule includes a per trip fee for trips less than 20 miles. The fee schedule includes a separate fee for a companion to accompany the client. Delaware has assumed that 25% of the members using transportation will require a companion based on historical data. Apply a trend factor to account for increases in the cost of delivering the service. Based on the assumption that the largest operating cost component for the delivery of transportation is the staff cost, Delaware used the same average wage growth for small businesses for the past 12 months from the “Small Business Employment Watch” index from the website: paychex.com as its used for the Employment Navigation Projected Pre-Waiver Cost.

Number of Recipients: Assume an additional **75** net new Pathways clients each year based on historical program growth in **CYs, 22 and 23 (Data from last 2 complete CY’s)**.

Trips per Year: Use the computed number of trips from the Projected Waiver cost calculations.

Multiply the projected number of A&D fee schedule rates, including trips that require a companion to compute the total cost per year for the Transportation Service. The difference in projected total cost from year to year is the aggregate trend rate that includes growth in the cost per unit, the number of clients and the number of trips.

2. Project the waiver expenditures for the upcoming waiver period.

Year 1 from: 01/01/2025 to 12/31/2025

Trend rate from current expenditures (or historical figures): EN=13.84%;
Trans=34.74%

Employment Navigation

| | |
|---------------------------|---------------------|
| Projected pre-waiver cost | <u>\$ 1,421,534</u> |
| Projected Waiver cost | <u>\$ 1,286,512</u> |
| Difference: | <u>\$ 135,022</u> |

Non-Medical Transportation

Projected pre-waiver cost \$ 221,413
Projected Waiver cost \$ 97,611
Difference: \$ 123,802

Year 2 from: 01/01/2026 to 12/31/2026

Trend rate from current expenditures (or historical figures): EN=12.07%;
Trans=27.50%

Employment Navigation

Projected pre-waiver cost \$ 1,610,294
Projected Waiver cost \$ 1,441,814
Difference: \$ 168,480

Non-Medical Transportation

Projected pre-waiver cost \$ 282,299
Projected Waiver cost \$ 124,449
Difference: \$ 157,850

Year 3 (if applicable) from: 01/01/2027 to 12/31/2027

(For renewals, use trend rate from previous year and claims data from the CMS-64)

Trend rate from current expenditures (or historical figures): EN=11.05%;
Trans=22.97%

Employment Navigation

Projected pre-waiver cost \$ 1,807,607
Projected Waiver cost \$ 1,601,073
Difference: \$ 206,534

Non-Medical Transportation

Projected pre-waiver cost \$ 347,148
Projected Waiver cost \$ 153,033
Difference: \$ 194,115

Year 4 (if applicable) from: 01/01/2028 to 12/31/2028

(For renewals, use trend rate from previous year and claims data from the CMS-64)

Trend rate from current expenditures (or historical figures): EN=10.20%;
Trans=19.88%

Employment Navigation

Projected pre-waiver cost \$ 2,014,157

Projected Waiver cost **\$ 1,764,396**
Difference: **\$ 249,761**

Non-Medical Transportation

Projected pre-waiver cost **\$ 416,160**
Projected Waiver cost **\$ 183,450**
Difference: **\$ 232,709**

Year 5 (if applicable) from: **01/01/2029** to **12/31/2029**
(For renewals, use trend rate from previous year and claims data from the CMS-64)

Trend rate from current expenditures (or historical figures): **EN=9.49%; Trans=17.63%**

Employment Navigation

Projected pre-waiver cost **\$ 2,230,135**
Projected Waiver cost **\$ 1,931,891**
Difference: **\$ 298,244**

Non-Medical Transportation

Projected pre-waiver cost **\$ 489,546**
Projected Waiver cost **\$ 215,450**
Difference: **\$ 273,752**