

## Self-Direction Assistance (SDA) Frequently Asked Questions May 2018

### Services and billing:

**1. Why are SDA services limited to assisting with personal supports?**

This is based upon the Federal Centers for Medicare and Medicaid approved definition of SDA. It is also designed to avoid a conflict of duties between the roles of those who assist with Home Based Supports and those who provide case management.

**2. Is the SDA able to assist individuals with securing their Medicaid benefits?**

If requested, SDAs can explain the Medicaid redetermination process; they can also provide skills training on completing the form to maintain and reinstate the individual's Medicaid benefits.

**3. If SDA has been hired to assist the Employer of Record with writing the PSW implementation strategy, can they also assist with (and bill for) monitoring progress?**

No. SDAs will not monitor the Employer of Record Implementation Strategy for progress; monitoring is the role of the ISC/case manager. An Employer of Record can hire a SDA to assist with completing the *Employer of Record Implementation Strategy form*. A "PSW implementation strategy" does not exist.

### SDA Implementation Strategy and documentation:

**4. Should the SDA forward Implementation Strategies to the Employer of Record?**

Yes.

**5. Do Implementation Strategies need to be reviewed monthly?**

The SDA must review their Implementation Strategy on a regular basis, no less than monthly, to ensure that the services they offer continue to meet the needs of the individual(s) receiving services.

**6. Does the SDA need to write an Implementation Strategy to reflect when they are assisting the Employer of Record with completing their Strategy Form?**

A Separate Implementation Strategy is not required for each task that the SDA will perform. If the Employer of record asks the SDA to assist with the *Employer of Record Implementation Strategy form*, this task should be included in the SDA's implementation Strategy along with all other services they will provide and any outcomes that they will support.

**7. Is there going to be a universal form for the SDA implementation strategies?**

No. Provider agencies, including SDAs, can determine their own tool/format, but it must follow the Implementation Strategy Guidelines provided by the DDD.

**8. If a SDA Implementation Strategy is complete, but does not have the guardian signature, is it ok to submit the signature page after the Implementation Strategy due date?**

Yes. Provider agencies have 20 days to complete their Implementation Strategy –this does not include obtaining approval/signature from the individual guardian.

**9. What is the time line between the signing of the Personal Plan and the date providers can have the Implementation Strategies meeting? Do we have to rush the IS meeting or can we just have it before the date of the annual plan would be due?**

After provider agencies receive a complete Personal Plan, they have 10 calendar days to review and sign the Provider Signature Page of the Personal Plan. Once this page is signed, provider agencies then have another 20 days to complete their Implementation Strategy –this does not include obtaining approval/signature from the individual guardian. The DDD does not require provider agencies, including SDAs, to have an Implementation Strategy meeting.

**10. Does there need to be an outcome in every provider agency Implementation Strategy (i.e., SDA, Supported Employment, and Community Day Services)?**

No. Some implementation strategies will only contain the details of services that will be provided. This will occur where the provider has not agreed to work toward any of the desired outcomes. Although some provider Implementation Strategies will not contain outcomes, all must at least contain a description of the services that will be provided.

**11. What documentation of services is required by the SDA?**

SDAs should maintain at least monthly notes on the status of services provided and progress toward any outcomes that the SDA is working toward. SDAs should review their Implementation Strategy and document that:

- a. The identified outcomes continue to be the desire of the individual receiving services as documented in the Personal Plan.
- b. The specific service(s) that were performed in that particular month (i.e. training family on hiring PSWs or how to complete Service Agreements).
- c. Services outlined in the Implementation Strategy continue to meet the individual's needs or require modification to better meet the individual's needs; and
- d. When modifications are required, what actions have been taken?

This documentation must be maintained in the individual's record.

**Employer of Record**

**12. Will there be any specific guidelines for the Employer of Record to reference regarding their role and responsibility?**

Yes. The Employer of Record's role is found in the Consumer Handbook for Home Based Services, which is available on the DHS website at:

<http://www.dhs.state.il.us/page.aspx?item=101181>

**13. Is the Employer of Record responsible for tracking PSW related Implementation Strategies and if so, how should this be documented?**

The Employer of Record will oversee the services and outcomes documented in their own Implementation Strategy. This might include services such as The Employer of Record is not required to keep documentation toward the attainment of outcomes. The provision of services will be documentation through billing. No additional documentation is required at this time.

**14. Should the services that an individual in HBS will receive be included in the Employer of Record's form or in the SDA's Implementation Strategy?**

The *Employer of Record Implementation Strategy* form should contain all outcomes and services from the Personal Plan that the individual, family, guardian or Employer of Record has agreed to work on or arrange. The SDA's Implementation Strategy should include a description of the services an SDA will provide and any outcomes this agency has agreed to support the person in.

**15. What is the timeframe for completing the Employer of Record Strategy once the Personal Plan is complete?**

The Employer of Record Implementation Strategy should be completed within 20 calendar days of the Personal Plan date.

**16. What is the Employer of Record responsibility when there is a rights restriction?**

The Employer of Record can direct individuals towards the *Rights of Individuals* [IL462-1201] document which is available through the DHS website at <http://intranet.dhs.illinois.gov/onenetlibrary/12/documents/Forms/IL462-1201.pdf>, as well as toward their ISC. People receiving services, their guardians, family members, or other representatives, may file complaints about their services as outlined in the *Rights of Individuals* document.

**17. Please clarify how an SDA is able to assist the Employer of Record with their Implementation Strategy.**

As desired by the individual/family, the SDA can assist with obtaining the form, explain how to complete the form, provide skills training to enable families to complete the form and also assist with providing a copy of the form to the ISC. The SDA should not complete the form on behalf of the individual/family.

**18. Is the *Employer of Record Implementation Strategy* required for all individuals using their home-based funding for personal support workers or is it optional?**

Program participants, family, and others who act as the Employer of Record in HBS, must develop an Implementation Strategy when they will work on or arrange any service (i.e. hiring their own PSWs) or outcome from the Personal Plan.

**19. How are situations handled when an Employer of Record doesn't agree with the Personal Plan outcome related to personal support services?**

The outcomes in the Personal Plan represent the desires and preferences of the person served. Ultimately, anyone serving as the Employer of Record should work on behalf of individual receiving services.

**20. Should there be anything on the document relating to a review date, ending date, etc. for each of the Outcomes?**

No

**Miscellaneous**

**21. Should STAR forms be done and sent to DHS if someone drops SDA services with a provider and does the self-directed assistance?**

No. If an individual/family no longer wants to use SDA services, they should notify their ISC as well as adjust their Service Agreement to reflect the change.

**22. How does DHS plan to inform providers about the new Service Agreement form? We are still using the old one as there has not been any official notice about this from DHS.**

The updated Home-Based Support Services (HBS) Service Agreement [IL462-2029] has been updated and, as of this communication, should be used at the time a new Service Agreement is required.

**23. When will the online version of the DD Waiver Manual be updated?**

The Division is in the process of updating its Rules, manuals and forms, including the DD Waiver Manual. A completion date for this manual has not been set.

	<b>Can SDAs bill for the following?</b>	<b>Yes/No</b>	<b>Notes:</b>
1	Meeting with ISC for Discovery and/or Personal Plan	No	N/A
2	Developing the SDA provider's implementation strategy	No	N/A
3	Documenting notes to support billing on the SDA services provided.	Yes	N/A
4	Assisting Employer of Record to complete their Implementation Strategy form.	Yes	N/A
5	Reviewing Personal Support Workers (hired directly by individual/family) notes in order to complete a monthly	No	This task is not required.

	implementation strategy		
6	Reviewing Direct Support Person (agency based) notes in order to complete a monthly implementation strategy	No	N/A
7	Review of behavior strategies	No	ISC should review if requested by individual/family.
8	Representative Payee for SS Benefits – maintain accounts, statements and records; pay all bills and monitor for extraneous charges that should not be paid by client; Representative Payee reports; provide spending money to client as needed based upon ability to budget (weekly, bi-weekly, or monthly); ensure adequate savings for needs and emergencies; assist with prioritizing "wants" vs. "needs", payroll assistance e.g. cashing checks, tax filing	No	The individual, guardian or Representative Payee should oversee these tasks. As needed, a PSW can teach required skills.
9	Professional level staff who are able to advocate, communicate and facilitate effectively; maintain positive working relationships with collaborating service providers, medical providers, housing providers, bank staff, pharmacies, attorneys, etc.	No	The Individual/family should oversee these activities. The ISC can assist with Waitlist applications for housing. A PSW can transport (i.e. to bank).
10	Medical advocacy - consistent staff who knows medical history to help schedule, attend, and advocate at appointments and during medical emergencies	No	Medical emergencies should be directed to call 911 as needed.
11	After hours and/or immediate availability to respond to emergency situations, medical or otherwise	No	Medical emergencies should be directed to call 911 as needed.
12	Medication assistance with refills and/or linkage to pharmacy services	No	The Individual/ family should oversee this activity or purchase Nursing services/55N.
13	Assist individual/family in acquiring needed medical supplies through insurance or other measures	Yes	PSW can also provide assistance in acquiring these services
14	Housing/Landlord assistance, advocacy - applications, furniture acquisition, eviction appeals, packing/moving assistance, pest control (including assistance with bed bug infestation control and treatment measures), apartment clean-out when moving to different level of care	No	The Individual/family should oversee these activities. The ISC can assist with Waitlist applications for housing. A natural support of PSW can assist these tasks also.
15	Utilities - phone, cell phone, cable, internet acquisition and use, troubleshooting	Yes	SDA can provide information and training to individual/family in acquiring and maintaining these services. PSW can assist also.
16	Benefit and charity applications - Energy assistance,	Yes	SDA can provide information

	child care subsidy applications, Lifeline, Christmas programs, Meals on Wheels - type programs		and training to individual/family in acquiring and maintaining these services. PSW can provide day to day supports
17	Employment/Educational support - assist with Division of Rehabilitation Services appointments, acquiring uniforms, non-skid shoes, etc.; school applications, scheduling, consultation with teachers and counselors as needed, Financial Aid applications	No	The ISC will assist with the need for DRS services. Natural Support or PSW can transport to DRS office.
18	Legal Advocacy - assist with interaction with law enforcement, courts	No	ISC or referral to Equip for Equality
19	Acquisition of food, clothing and household needs when finances are low or absent	Yes	SDA can provide information and training to individual/family in acquiring and maintaining these services. SDA ISC oversee if crisis situation; PSW can assist with day to day task
20	Planning and transporting to recreational activities, group or individual e.g. baseball games, Theater productions, holiday parties, consumer meetings, special shopping trips, movies, zoo, science center, etc. - especially when the activity is identified as a goal/outcome or "hope" or "dream" of client	No	The Individual/family should oversee these activities. Can also include natural supports or PSW.
21	Self-advocacy assistance and training - annual trips to Speak UP/Speak Out Summit, other statewide and local self-advocacy activities	No	The Individual/family should oversee these activities. Can also include natural supports or PSW.
22	Emotional support and companionship - many have no family and/or very few friends or natural supports; long-term relationships with agency staff	No	Natural supports or PSW can assist.
23	Pet acquisition, care training and vet appointments	No	The need for a service pet should be identified in the Plan.
24	Computer/Tablet acquisition and lessons to use technology safely	No	The need for assistive technology should be identified in the Plan
25	Community access -acquire free bus passes, gym memberships, etc.	No	PSW can assist with this task.
26	IEP Advocacy	No	N/A
27	Relationship support - assist with developing relationships with others through social activities, planning dates, transportation, sex education, assistance with acquiring birth control	No	These task should be accomplished by using natural supports or a PSW
28	Parenting skills training and assistance	No	This task should be accomplished by using

			natural supports or a PSW
29	End of life planning/care - pre-planning and arrangements for clients and/or loss of their family members	No	Natural Supports; if not available then the FCRC/local office and ISC can assist.
30	Non-medical transportation - many people live outside of bus routes and rely on staff for transportation.	No	Waiver participants can purchase Non-medical transportation/55T.