The NYSDOH is asking for feedback from HCBS designated *Caregiver Family Supports and Services* and *Community Advocacy Training and Supports* providers regarding the service combination proposal outlined below. If the State pursues this proposal, a 1915(c) Children’s Waiver Amendment would need to be requested and approved by the Centers for Medicare and Medicaid Services (CMS) prior to implementation.

Thank you in advance for your review and feedback regarding this proposal to improve service delivery within the Children’s Waiver.

**Background**: The State has received feedback that (1) providers struggle to find sufficient, qualified staff to deliver Children’s HCBS and (2) that care managers and providers sometimes find it difficult to choose the best service(s) for a child/youth given the breadth of options within the service array. In particularly, the State has heard that some services – such as *Caregiver Family Supports and Services* and *Community Advocacy Training and Supports* – are similar, which may cause confusion for providers, care managers, and families.

**Proposal**: The State proposes combining *Caregiver Family Supports and Services* and *Community Advocacy Training and Supports* into one service call “Caregiver Family Supports and Community Advocacy Services” that will allow providers to meet the needs of their families in advocacy, navigating systems, and communicating with providers. The new, combined service will incorporate all components of both services and merge the qualifications so that providers meeting the qualifications of either service would be able to deliver the combined service – thus allowing a greater mix of practitioners that can address very specific medical, complex behavioral health, child welfare, developmental disabilities, and substance abuse needs as well as any combination of co-occurring needs. The State proposes a tiered rate structure so that providers meeting the higher qualifications would use the higher rate.

**Benefits**: In combining these two services, the State hopes to achieve the following:

1. Expanding the providers available to deliver both services by allowing providers meeting either qualification to deliver both services and automatically designating providers for both services.
2. Reducing the staffing burden on providers by giving more flexibility in the staff qualifications able to deliver the combined service.
3. Enhancing care manager capacity to identify services to benefit their members by reducing confusion and giving more flexibility in the services components.
4. Increasing child/family choice – by combining the services, families also have more flexibility to combine the service components in a way that works best for them, families have more choices in providers who deliver the service, and families may find the choice less confusing.

**Staff Qualifications and Rates**

Individual staff qualifications will be divided into two levels, with different rates. (Please note: that the current qualifications and rates have not been changed, just combined for flexibility and to outline how a provider would bill according to their staff’s qualifications conducting the service.)

Individual Staff Qualifications for Practitioner Level 1

Minimum Qualifications:

* High school diploma, high school equivalency preferred or a State Education Commencement Credential (e.g. SACC or CDOS) with related human service experience

Preferred Qualifications:

* Experience working with children/youth

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| **Rate Code** | **Rate Description**  (*previously Caregiver Family Supports and Services*) | **Upstate hourly** | **Downstate hourly** |
| 8003 | Caregiver Family Supports and Community Advocacy Services Individual Practitioner Level 1 | 96.86 | 108.62 |
| 8004 | Caregiver Family Supports and Community Advocacy Services Practitioner Level 1 Grp 2 | 62.96 | 70.61 |
| 8005 | Caregiver Family Supports and Community Advocacy Services Practitioner Level 1 Grp 3 | 46.81 | 52.50 |

Individual Staff Qualifications Practitioner Level 2:

Minimum Qualifications:

* An individual employed by the agency with a Bachelor’s degree plus two years of related experience OR
* LPN

Preferred Qualifications:

* An individual employed by the agency with a Master’s degree in education, or a Master’s degree in a human services field plus one year of applicable experience OR
* RN

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| **Rate Code** | **Rate Description**  (*previously Community Advocacy and Supports*) | **Upstate hourly** | **Downstate hourly** |
| 8009 | Caregiver Family Supports and Community Advocacy Services Practitioner Level 2 Individual | 134.35 | 150.72 |
| 8010 | Caregiver Family Supports and Community Advocacy Services Practitioner Level 2 Group 2 | 87.35 | 97.97 |
| 8011 | Caregiver Family Supports and Community Advocacy Services Practitioner Level 2 Group 3 | 64.96 | 72.85 |

Supervisory Staff Qualifications

Minimum Qualifications for supervisors of staff delivering **Practitioner Level 1**:

* Bachelor’s degree with one year of experience in human services working with children/youth OR
* LPN OR
* RN

Minimum Qualifications for supervisors of staff delivering **Practitioner Level 2**:

* Master’s degree with one year of experience in human services working with children/youth OR
* RN with two years’ experience OR
* Nurse practitioner OR
* Clinical Nurse Specialist

**Questions for Providers**: to ensure that this proposal meets the needs of providers, the State would like to hear from providers regarding the following points:

1. Does the combination of services and associated expansion of practitioners able to deliver the service help alleviate your staffing challenges?
2. Does the combination of service components for these services makes sense for the needs of your patients/families?
3. What challenges would you anticipate if the services were combined? What benefits?

Thank you again for your feedback and assistance. Please respond to [BH.Transition@health.ny.gov](about:blank) no later than **January 13, 2021.**