

**NOW and COMP Waiver Rate Study**  
**Fiscal Impact Analysis<sup>1</sup>**  
 prepared for Georgia Department of Behavioral Health and Developmental Disabilities

FY2021 Claims			Current Permanent Rates <sup>2</sup>			Draft Rates				
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<b>Total - All Services</b>		<b>\$630,047,216</b>		<b>\$704,177,272</b>		<b>\$970,930,029</b>	<b>\$266,752,757</b>	<b>37.9%</b>
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*Support Coordination*

Support Coordination	128,671	\$22,445,045	\$174.44	\$163.73	\$21,067,303	128,671	\$196.64	\$25,302,485	\$4,235,182	20.1%
Support Coordination, Intensive	25,584	\$11,791,682	\$460.90	\$493.73	\$12,631,588	25,584	\$506.50	\$12,958,296	\$326,708	2.6%
<b>Subtotal</b>		<b>\$34,236,727</b>			<b>\$33,698,891</b>			<b>\$38,260,781</b>	<b>\$4,561,890</b>	<b>13.5%</b>

*Community Living Support*

Community Living Support - Basic	1,760,813	\$10,678,900	\$6.06	\$6.80	\$11,973,528	1,760,813	\$9.30	\$16,375,561	\$4,402,033	36.8%
Community Living Support, 2 Members - Basic	23,675	\$81,610	\$3.45	\$3.73	\$88,308	23,675	\$5.11	\$120,979	\$32,672	37.0%
Community Living Support, 3 Members - Basic	32,660	\$85,336	\$2.61	\$2.72	\$88,835	32,660	\$3.72	\$121,495	\$32,660	36.8%
Community Living Support - Extended	11,045,020	\$51,662,596	\$4.68	\$6.15	\$67,926,873	11,045,020	\$8.63	\$95,318,523	\$27,391,650	40.3%
Community Living Support, 2 Members - Extended	1,958,017	\$7,819,510	\$3.99	\$3.39	\$6,637,678	1,958,017	\$4.75	\$9,300,581	\$2,662,903	40.1%
Community Living Support, 3 Members - Extended	2,047,670	\$5,526,331	\$2.70	\$2.47	\$5,057,745	2,047,670	\$3.45	\$7,064,462	\$2,006,717	39.7%
<b>Subtotal</b>		<b>\$75,854,282</b>			<b>\$91,772,967</b>			<b>\$128,301,600</b>	<b>\$36,528,633</b>	<b>39.8%</b>

*Respite*

Respite, 1:1	47,157	\$57,082	\$1.21	\$5.17	\$243,802	47,157	\$7.74	\$364,995	\$121,193	49.7%
Respite, 1:2	0	\$0	-	\$2.85	\$0	0	\$4.26	\$0	\$0	-
Respite, 1:3	0	\$0	-	\$2.07	\$0	0	\$3.10	\$0	\$0	-
Respite-Daily Category 1 Out of Home	2,769	\$393,482	\$142.10	\$164.52	\$455,556	2,769	\$182.84	\$506,284	\$50,728	11.1%
Respite-Daily Category 2 Out of Home	627	\$106,864	\$170.44	\$224.39	\$140,693	627	\$246.75	\$154,712	\$14,020	10.0%
<b>Subtotal</b>		<b>\$557,427</b>			<b>\$840,050</b>			<b>\$1,025,991</b>	<b>\$185,941</b>	<b>22.1%</b>

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*Community Residential Alternative - Host Homes*

Host Home, Category 1 (Levels 1-4)	380,901	\$55,581,738	\$145.92	\$160.06	\$60,967,014	380,901	\$161.67	\$61,580,265	\$613,251	1.0%
Host Home, Category 2 (Levels 5-7)	62,754	\$11,491,661	\$183.12	\$198.40	\$12,450,394	62,754	\$218.18	\$13,691,668	\$1,241,274	10.0%
<b>Subtotal</b>		<b>\$67,073,399</b>			<b>\$73,417,408</b>			<b>\$75,271,932</b>	<b>\$1,854,525</b>	<b>2.5%</b>

*Community Residential Alternative - Group Homes*

3-Person Residence, Category 1 (Level 1)	47,340	\$8,355,584	\$176.50	\$191.21	\$9,051,881	47,340	\$273.67	\$12,955,538	\$3,903,656	43.1%
3-Person Residence, Category 2 (Level 2)	47,235	\$11,180,930	\$236.71	\$251.74	\$11,890,939	47,235	\$300.57	\$14,197,424	\$2,306,485	19.4%
3-Person Residence, Category 3 (Levels 3-4)	126,850	\$33,653,392	\$265.30	\$280.04	\$35,523,074	126,850	\$355.22	\$45,059,657	\$9,536,583	26.8%
3-Person Residence, Category 4 (Levels 5-7)	150,953	\$35,333,222	\$234.07	\$297.14	\$44,854,174	150,953	\$470.61	\$71,039,991	\$26,185,817	58.4%
4-Person Residence, Category 1 (Level 1)	77,022	\$11,985,975	\$155.62	\$165.73	\$12,764,856	77,022	\$231.32	\$17,816,729	\$5,051,873	39.6%
4-Person Residence, Category 2 (Level 2)	80,767	\$17,520,791	\$216.93	\$230.05	\$18,580,448	80,767	\$272.09	\$21,975,893	\$3,395,445	18.3%
4-Person Residence, Category 3 (Levels 3-4)	291,899	\$67,941,813	\$232.76	\$256.75	\$74,945,068	291,899	\$317.76	\$92,753,826	\$17,808,758	23.8%
4-Person Residence, Category 4 (Levels 5-7)	265,070	\$65,876,020	\$248.52	\$272.42	\$72,210,369	265,070	\$415.62	\$110,168,393	\$37,958,024	52.6%
5-Person Residence, All Categories <sup>3</sup>	15,869	\$2,555,122	\$161.01	\$169.93	\$2,696,619	15,869	\$169.93	\$2,696,619	\$0	0.0%
<b>Subtotal</b>		<b>\$254,402,849</b>			<b>\$282,517,430</b>			<b>\$388,664,071</b>	<b>\$106,146,641</b>	<b>37.6%</b>

*Additional Staffing*

Additional Staffing, Basic	12,935,003	\$52,182,075	\$4.03	\$5.00	\$64,675,015	12,935,003	\$7.41	\$95,848,372	\$31,173,357	48.2%
Additional Staffing, Enhanced	68,487	\$325,394	\$4.75	\$5.37	\$367,775	68,487	\$8.32	\$569,812	\$202,037	54.9%
<b>Subtotal</b>		<b>\$52,507,470</b>			<b>\$65,042,790</b>			<b>\$96,418,184</b>	<b>\$31,375,394</b>	<b>48.2%</b>

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*Supported Employment<sup>4,5</sup>*

Supported Employment, Group (1:8 - 1:10)	36,187	\$65,348	\$1.81	\$2.16	\$78,164	36,187	\$2.33	\$84,316	\$6,152	7.9%
Supported Employment, Group (1:5 - 1:7)	36,187	\$65,348	\$1.81	\$2.16	\$78,164	36,187	\$3.18	\$115,075	\$36,911	47.2%
Supported Employment, Group (1:3 - 1:4)	54,281	\$98,023	\$1.81	\$2.16	\$117,246	54,281	\$5.03	\$273,031	\$155,785	132.9%
Supported Employment, Group (1:2)	54,281	\$98,023	\$1.81	\$2.16	\$117,246	54,281	\$8.35	\$453,242	\$335,996	286.6%
Job Maintenance	477,853	\$942,232	\$1.97	\$2.16	\$1,032,162	242,075	\$12.95	\$3,134,884	\$2,102,721	203.7%
Supported Employment Individual	189,223	\$1,472,719	\$7.78	\$8.73	\$1,651,917	189,223	\$11.18	\$2,115,171	\$463,254	28.0%
<b>Subtotal</b>		<b>\$2,741,692</b>			<b>\$3,074,899</b>			<b>\$6,175,718</b>	<b>\$3,100,819</b>	<b>100.8%</b>

*Prevocational Services<sup>6</sup>*

Prevocational Services, Facility, Category 1	454,565	\$1,397,222	\$3.07	\$3.33	\$1,513,701	454,565	\$2.02	\$918,221	(\$595,480)	(39.3%)
Prevocational Services, Facility, Category 2	520,099	\$1,603,305	\$3.08	\$3.33	\$1,731,929	520,099	\$2.49	\$1,295,046	(\$436,883)	(25.2%)
Prevocational Services, Facility, Category 3	462,564	\$1,425,278	\$3.08	\$3.33	\$1,540,339	462,564	\$3.44	\$1,591,221	\$50,882	3.3%
Prevocational Services, Facility, Category 4	150,263	\$463,182	\$3.08	\$3.33	\$500,377	150,263	\$4.37	\$656,650	\$156,274	31.2%
Prevocational Services, Community, Category 1	50,507	\$155,247	\$3.07	\$3.33	\$168,189	50,507	\$2.95	\$148,996	(\$19,193)	(11.4%)
Prevocational Services, Community, Category 2	57,789	\$178,145	\$3.08	\$3.33	\$192,437	57,789	\$3.55	\$205,150	\$12,714	6.6%
Prevocational Services, Community, Category 3	51,396	\$158,364	\$3.08	\$3.33	\$171,149	51,396	\$4.50	\$231,282	\$60,133	35.1%
Prevocational Services, Community, Category 4	16,696	\$51,465	\$3.08	\$3.33	\$55,597	16,696	\$6.48	\$108,190	\$52,592	94.6%
<b>Subtotal</b>		<b>\$5,432,208</b>			<b>\$5,873,717</b>			<b>\$5,154,756</b>	<b>(\$718,961)</b>	<b>(12.2%)</b>

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*Community Access<sup>7</sup>*

Comm. Access - Group, Facility, Category 1	2,223,317	\$7,011,049	\$3.15	\$3.33	\$7,403,645	2,223,317	\$2.20	\$4,891,297	(\$2,512,348)	(33.9%)
Comm. Access - Group, Facility, Category 2	4,016,145	\$12,642,235	\$3.15	\$3.33	\$13,373,764	4,016,145	\$2.66	\$10,682,947	(\$2,690,817)	(20.1%)
Comm. Access - Group, Facility, Category 3	8,668,309	\$27,268,347	\$3.15	\$3.33	\$28,865,470	8,668,309	\$3.61	\$31,292,596	\$2,427,127	8.4%
Comm. Access - Group, Facility, Category 4	5,281,338	\$16,519,051	\$3.13	\$3.33	\$17,586,855	5,281,338	\$4.55	\$24,030,087	\$6,443,232	36.6%
Comm. Access - Group, Community, Category 1	488,045	\$1,539,011	\$3.15	\$3.33	\$1,625,190	488,045	\$3.13	\$1,527,581	(\$97,609)	(6.0%)
Comm. Access - Group, Community, Category 2	881,593	\$2,775,125	\$3.15	\$3.33	\$2,935,704	881,593	\$3.73	\$3,288,342	\$352,637	12.0%
Comm. Access - Group, Community, Category 3	1,902,800	\$5,985,735	\$3.15	\$3.33	\$6,336,323	1,902,800	\$4.68	\$8,905,102	\$2,568,779	40.5%
Comm. Access - Group, Community, Category 4	1,159,318	\$3,626,133	\$3.13	\$3.33	\$3,860,529	1,159,318	\$6.66	\$7,721,058	\$3,860,529	100.0%
Community Access Individual	1,198,960	\$8,299,759	\$6.92	\$7.94	\$9,519,742	1,198,960	\$9.85	\$11,809,756	\$2,290,014	24.1%
<b>Subtotal</b>		<b>\$85,666,445</b>			<b>\$91,507,223</b>			<b>\$104,148,766</b>	<b>\$12,641,543</b>	<b>13.8%</b>

*Nursing Services*

Nursing Services, LPN	4,630,738	\$45,141,905	\$9.75	\$10.71	\$49,595,204	4,630,738	\$24.36	\$112,804,778	\$63,209,574	127.5%
Nursing Services, RN	226,738	\$2,086,619	\$9.20	\$9.37	\$2,124,535	226,738	\$36.68	\$8,316,750	\$6,192,215	291.5%
<b>Subtotal</b>		<b>\$47,228,525</b>			<b>\$51,719,739</b>			<b>\$121,121,528</b>	<b>\$69,401,788</b>	<b>134.2%</b>

*Behavioral Supports Services*

Behavioral Supports Services Level 1	96,120	\$1,787,058	\$18.59	\$20.08	\$1,930,090	96,120	\$24.36	\$2,341,483	\$411,394	21.3%
Behavioral Supports Services Level 2	109,905	\$2,550,587	\$23.21	\$25.23	\$2,772,903	109,905	\$36.68	\$4,031,315	\$1,258,412	45.4%
<b>Subtotal</b>		<b>\$4,337,645</b>			<b>\$4,702,993</b>			<b>\$6,372,799</b>	<b>\$1,669,806</b>	<b>35.5%</b>

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<i>Nutritional Services</i>										
Nutrition Evaluation	33	\$491	\$14.89	\$15.94	\$526	33	\$28.09	\$927	\$401	76.2%
Nutrition Follow-up	542	\$8,055	\$14.86	\$15.94	\$8,639	542	\$23.94	\$12,975	\$4,336	50.2%
<b>Subtotal</b>		<b>\$8,547</b>			<b>\$9,166</b>			<b>\$13,902</b>	<b>\$4,737</b>	<b>51.7%</b>

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**Notes**

- 1 This analysis estimates the cost of the draft rate models published in December 2022 by repricing fiscal year 2021 claims. The analysis does not account for any changes to enrollment or overall utilization. The analysis reflects a systemwide estimate; impacts at the provider-level will vary based on the services they provide, program details (such as group home size and where Community Access-Group services are provided), and the individuals they serve.
- 2 To estimate ongoing costs, the fiscal impact analysis compares the proposed rates to the permanently established rates, including rate increases for many services of five percent on July 1, 2021 and two percent on July 1, 2022. The comparison does not include rate increases that are already scheduled to expire, including a temporary ten percent rate increase for many services on March 1, 2021.
- 3 No rate changes are proposed for five-person group homes.
- 4 Supported Employment-Group currently covers both group employment and job maintenance for individual employment, but there is no indicator on the claim to distinguish between these supports. To estimate the distribution between these two supports, the analysis evaluated the number of units of support that each individual received each month. If all billed months for an individual were between 240 and 320 units (the minimum and maximum to be billed), or if an individual received at least three months of support, none of those months had more than 320 units, and no more than two of those months were less than 240 hours (to account for months when an individual may transition into or out of employment), the individual was assumed to be receiving job maintenance. Otherwise, it was assumed that they received group employment supports.

The draft rates for group employment supports vary based on staffing ratio. The analysis relies on provider survey results to estimate the distribution of units of service across staffing ratios. The survey suggested that most supports are provided to small groups so the analysis assumes 30 percent of supports are delivered at a one-to-two ratio, 30 percent at a ratio of one-to-three or one-to-four, 20 percent at a one-to-five to one-to-seven ratio, and 20 percent at a one-to-eight to one-to-ten ratio.

Job Maintenance Unit Re-Pricing methodology (for Supported Employment Group billed units):

To reprice job maintenance units, the analysis first includes the 'first hour' rate for each month in which job maintenance was billed. For additional supports, the draft rate would be paid for direct supports only. Based on results from the provider survey, the analysis assumes that, overall, individuals receive direct support for half of their worked hours.

- 5 All Supported Employment-Individual services were assumed to be related to Job Coaching. To reprice the claims, the analysis evaluated each month in which an individual received support. If more than 160 units were billed in that month, the first four units were priced at the 'first hour' rate and the remaining units were priced at the 'additional support' (non-intensive) rate. If fewer than 160 units were billed, all units were priced at the additional support rate.

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**Notes**

6 The draft rates for Prevocational Services vary based on setting (facility versus community) and an individual's level of need based on results of Supports Intensity Scale and Health Risk Screening Tool assessments. The analysis first distributed units between settings based on provider survey results that suggest 90 percent of services are delivered in a facility and 10 percent are delivered in the community. When available, the analysis relies on actual assessment results for individuals who received Prevocational Services, finding the following distribution of units by draft rate category:

- Category 1: 24.0%
- Category 2: 29.6%
- Category 3: 31.7%
- Category 4: 14.7%

Almost all individuals for whom assessment results were not available did not receive Community Residential Alternative (CRA) services. Individuals who are not in one of these settings tend to have lower assessed needs so the units that could not be tied to an assessment level were distributed based on the non-CRA population:

- Category 1: 31.1%
- Category 2: 34.4%
- Category 3: 27.8%
- Category 4: 6.7%

7 The draft rates for Community Access-Group vary based on setting (facility versus community) and an individual's level of need based on results of Supports Intensity Scale and Health Risk Screening Tool assessments. The analysis first distributed units between settings based on provider survey results that suggest 82 percent of services are delivered in a facility and 18 percent are delivered in the community. When available, the analysis relies on actual assessment results for individuals who received CAG, finding the following distribution of units by draft rate category:

- Category 1: 9.5%
- Category 2: 16.3%
- Category 3: 44.6%
- Category 4: 29.6%

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- Category 1: 13.6%
- Category 2: 26.0%
- Category 3: 40.1%
- Category 4: 20.2%