**FAQs for FB Day**

Memo: **Authorization Changes for Facility Based Day Services Effective July 1,** 2016

1. The memo mentions a process for justifying continuation of FB Day beyond “*the first 6-month approval period*”.  Yet, this specific period of time is not explicitly stated or explained elsewhere in the memo or in the Waiver service definition.  What document or other resource is available to us to demonstrate the length or other conditions of the approval period to our constituents as determined by DIDD? ***Please refer to the July 16, 2015 memo, Billing for Supported Employment. On page two, “…effective July 1, 2016, Facility-Based Day Services will be evaluated and authorized for 6 month periods.” This time-limited approval was discussed during the spring 2015 webinars, titled “Changes to the State’s HCBS Waivers” available at the following link:*** <http://tn.gov/assets/entities/didd/attachments/Changes_to_the_States_HCBS_Waivers.pdf>
2. Will FB Day approvals be limited to a 6-month period in all cases?  Can an approval period be shorter or longer than 6 months? ***Approvals can be for shorter periods of time, but cannot exceed 6 months.***

3.     Does DIDD expect the ISC to limit requests submitted to the RO to no more than 6 months?  Or, will the ISC request the full 12 months (243 days), and let the DIDD shorten the approval period in its disposition of the request? ***It would be easier for Plans Review to fully approve a request for 6 months, but if a plan is received for more than 6 months it can only be partially approved (6 months)***

4.   If the need can be justified, can a person be approved for consecutive 6-month periods each ISP year? Is there any limit to the total number of approval periods that can be requested or granted for a person over their lifetime? ***Consecutive approvals for FB Day Services can be obtained with appropriate justification however; a new request with information justifying continued need and clearly documenting progress towards achieving individualized habilitation goals and efforts toward transitioning to more integrated and competitive employment options is required for each 6-month period. Simultaneous approvals of services for more than one 6-month period cannot be authorized.***

***No. As mentioned in the June 20, 2016 joint memo, “Pursuant to the currently approved waiver service definition in each of the Section 1915 (c) waivers: Day Services may be provided in a facility setting only when selected by a person supported who needs time-limited pre-vocational training...”. It is the expectation that if pre-vocational (or community living skills) training is approved in a facility-based setting, service notes and planning activities should clearly document progress being made towards achieving individualized habilitation goals and efforts toward transitioning to more integrated and competitive employment options.***

5.     Can a 6-month approval period bridge or cross annual ISPs, or should each period be a length of time that can be contained within an ISP year? (For example, if an ISP is amended 7 months after its effective date to add FB Day as a new service, should the request/approval be truncated to 5 months in order to expire with the current annual ISP?) ***The 6-month approval period cannot cross annual ISP dates and should be a length of time contained within an ISP year.***

6.     What expectations will DIDD set and communicate to ensure providers monitor the expiration and anticipate the continuation of a person’s FB Day if it needs to be extended?  (If a provider determines that an additional approval period is needed, the provider must communicate such to the person’s ISC in no less than 21 days prior to service expiration.  This is critical to ensure the ISP can be amended, submitted, reviewed and a disposition obtained before the current approval expires.  This must include the provider proactively sending the ISC the documentation required by DIDD for reviewing the extension request.) ***DIDD’s expectation, relative to the timely submission of service requests, remains the same for this service as it is for all services.***

7.     With respect to the 243-day annual benefit limit for Day Services, how should the units requested/approved be portioned within a period?  What factors need to be considered in portioning the units if the person has a combination of Employment and Day Services that includes time-limited FB Day?  ***The same precautions would apply as when different day services are provided for the same person by different providers.***

8.     In stating that FB Day with service effective dates prior to July 1, 2016 may continue as previously authorized, what is meant by “*until the next review period*”?  Does the “*next review period*” refer to the next annual update of the ISP?  ***Yes.*** If yes, to be clear, would an intervening amendment to that ISP (unrelated to Day services) require or result in modification of the FB Day service? ***The “next review period” refers to the next annual update of the ISP, unless there is an intervening amendment to an ISP related to the FB Day service. In that instance, it would require or result in a modification of the FB Day service. If the intervening amendment to an ISP is not related to FB Day, it will not require a modification of the FB Day service.***

9.     What is the definition of, or what are examples of, “*community living goals*”?  ***Community Living Goals refer to goals that include, but are not limited to, assisting the person with engaging in community life, controlling personal resources, building relationships, working through barriers and identifying natural supports.*** In distinguishing between the two instances in which FB Day might be warranted, what is the difference between “*pre-vocational*” goals in the first instance, and “*employment*” goals in the second instance discussed in the memo? ***The second instance you are referring to is “…a person who is not receiving prevocational services, but chooses to receive facility based day services in order to develop individualized and specific skills that will support the person in pursuing and achieving employment and/or community living goals…”***

***There are too many possibilities of prevocational or community living scenarios for DIDD to provide examples.***

10. With respect to including within the ISP a clear plan for meeting one of the two conditions for FB Day, where in the ISP does DIDD expect the plan to be included?  Would it be constructed within the Action Plan (Outcomes) section, or stated in the Day section of the Personal Focus?  Having a uniform way (and even an example) of how to include it in the ISP would be a great help to those who will have write it and review it. ***There is currently an expectation that there is an outcome for all paid services, and this change in authorizing FB Day services does not alleviate that expectation.*** ***That being said, an action plan, developed by the person and their COS, should also be detailed within the “day” section of the ISP. This should make tracking progress (a requirement for subsequent reviews) easier.***

1. Is pre-vocational training the only one which is time limited and to be approved in 6 month increments or does the 6 month approval apply to both categories?  ***This applies to anyone receiving facility based day services.***
2. If a person chooses to spend all 6 hours at the facility and they are approved for FB Day services based off of time-limited pre-vocational training, are they required to engage in pre-vocational training for the entire 6 hours or can they combine this training with other activities of interest at the facility?  ***The memo states that; FB Day service can only be approved for 1) a person who needs time-limited pre-vocational training, when such training is not available on the job site; or 2) a person who, through their person-centered planning process chooses to participate in a facility based program in order to focus on the development of individualized and specific skills that will support the person in pursuing and achieving employment and/or community living goals.***