



Waiver Rate Study Initial Recommendations

– presented by –
BURNS & ASSOCIATES
A Division of
Health Management Associates

September 3, 2025



Rate Study Background

- The state of Utah issued a request for proposal for a comprehensive study of payment rate methodologies for home and community-based services (HCBS) delivered through the Division of Services for People with Disabilities (DSPD)
 - Scope covers services through Medicaid waivers operated by DSPD
 - Community Supports Waiver
 - Community Transition Waiver
 - Limited Supports Waiver
 - Physical Disability Waiver
 - Acquired Brain Injury Waiver
 - The rate study includes agency-managed services and self-administered services (SAS)
- Burns & Associates, a division of Health Management Associates (HMA-Burns), was selected to complete the rate study

Purpose of Presentation

- Present an overview of HMA-Burns' *initial* rate study recommendations
 - Public comments will be considered before recommendations are finalized
 - DSPD will review final recommendations from HMA-Burns
- Ensure stakeholders understand the materials, data sources, calculations, and resulting recommendations so that they may review and offer comments
 - HMA-Burns will be available throughout the public comment period to respond to any technical questions that stakeholders need addressed to provide comments
- Encourage participation in the public comment process
 - Comments regarding the recommendations should be submitted in writing to allow for the consolidation and review of all feedback

Agenda

- About Burns & Associates
- Rate Study Process
- Draft Rate Study Recommendations
- Next Steps

About Burns & Associates



About Burns & Associates

- Health policy consultants specializing in assisting state Medicaid agencies and related departments (developmental disabilities and behavioral health authorities)
 - Consulted in approximately 30 states since its founding in 2006
 - Acquired by Health Management Associates in September 2020
- Experience in the intellectual and developmental disabilities field
 - Policy development, including service standards and billing rules
 - Provider rate-setting
 - Using assessment instruments to inform individualized budgets
 - Program operations, including fiscal analyses and implementation strategies
- Subcontractor to Human Services Research Institute (HSRI) on review of long-term services and supports in Utah

Development of Independent Rate Models

- Payment rates aim to reflect the reasonable costs providers incur to deliver services consistent with the state's requirements and individuals' service plans
- Consider data from multiple sources rather than depending on any single source

Policies, Rules, and Standards	Provider and Stakeholder Input	Published Sources	Special Studies
<p>Examples include:</p> <p>Program Regulations</p> <p>Manuals</p>	<p>Examples include:</p> <p>Provider Survey</p> <p>Public Comments</p>	<p>Examples include:</p> <p>BLS Wage Data</p> <p>IRS Mileage Rates</p>	<p>Examples include:</p> <p>Rate Benchmarking</p>

Development of Independent Rate Models (cont.)

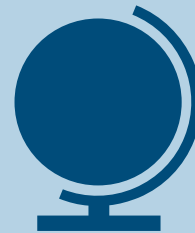
- Specific rate assumptions are detailed
 - Examples: direct support staff wages and benefits, staffing levels, transportation, etc.
 - In general, assumptions are not mandates (for example, providers are not expected to pay all staff exactly what is assumed in a payment model)
- A service may have multiple rates to account for differences that impact providers' costs



Staffing levels, staffing ratios, etc.



**Service Setting
(e.g., facility or community-based)**



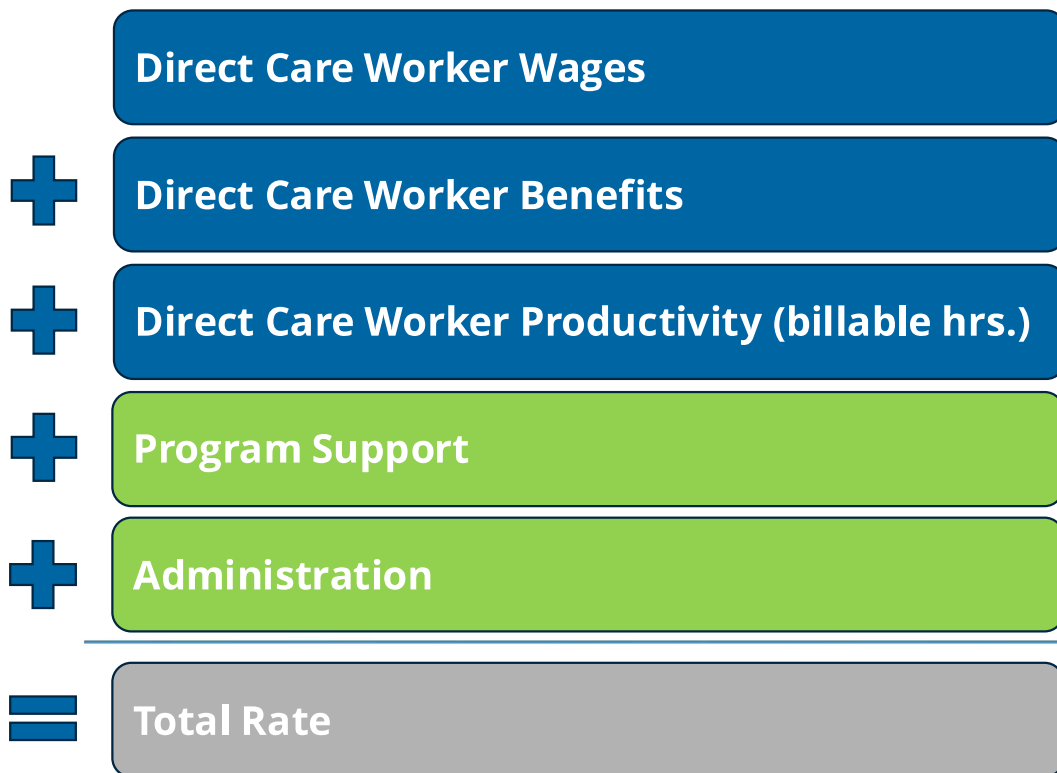
**Geography
(e.g. urban and rural)**



**Staff Qualifications and Training
(e.g., RNs and LPNs)**

Components of Independent Rates

Five factors in all HCBS (non-facility) rates:



Other factors vary by service, for example:

- Staffing ratios
- 'Bundled' clinical supports
- Attendance/ occupancy
- Transportation-related costs
- Program facilities and supplies

Rate Model Example

Companion (COM)

		Urban	Rural	
Unit of Service		15 Minutes	15 Minutes	
Direct Service Staff Wages and Benefits	- Percent of Direct Care <i>Staff</i> Working Full-Time	80.0%	80.0%	
	- % of Non-Overtime Direct Care <i>Hours</i> Worked by FT Staff	88.9%	88.9%	
	- Direct Staff Hourly Wage	\$19.93	\$18.12	
	- Employee Benefit Rate (weighted by FT/ PT, as % of wages)	30.0%	32.1%	
	Hourly Staff Cost Before Productivity Adj. (wages + benefits)	\$25.91	\$23.94	
	<i>Productivity Adjustments</i>			
	Total Hours	36.00	36.00	
	- Travel Time Between Individuals	1.21	1.81	
	- Recordkeeping	0.40	0.40	
	- Employer Time	0.90	0.90	
	- Time Lost Due to Missed Appointments	0.40	0.40	
	- Training	0.77	0.77	
	- Paid Time Off	3.08	3.08	
	"Billable" Hours	29.24	28.64	
Productivity Factor	1.23	1.26		
Staff Cost After Productivity Adj. per Billable Hour		\$31.87	\$30.16	
Mileage	- Number of Miles Traveled per Week	150	225	
	- Amount per Mile	\$0.700	\$0.700	
	Weekly Mileage Cost	\$105.00	\$157.50	
	Mileage Cost per Billable Hour	\$3.59	\$5.50	
Admin. and Program Support	Hourly Cost Before Administration and Program Support	\$35.46	\$35.66	
	- Program Support Funding per Day	\$15.00	\$15.00	
	Program Support Cost per Billable Hour	\$2.56	\$2.62	
	- Administration Percent	10.0%	10.0%	
	Administration Cost per Billable Hour	\$4.22	\$4.25	
Total Cost per Billable Hour		\$42.24	\$42.53	
Rate per 15 Minutes		\$10.56	\$10.63	

- Direct support staff wages and benefits
 - Largest component of costs (60-80 percent) when including productivity
 - Data gathered from multiple sources
 - Review of staff qualifications and responsibilities
 - Provider survey
 - Bureau of Labor Statistics data

- Accounting for 'productivity'
 - Rate models seek to reflect a 'typical' week for direct support staff by establishing productivity adjustments for non-billable time
 - Examples include training, travel, documentation, and employer time

Rate Model Example (cont.)

Companion (COM)

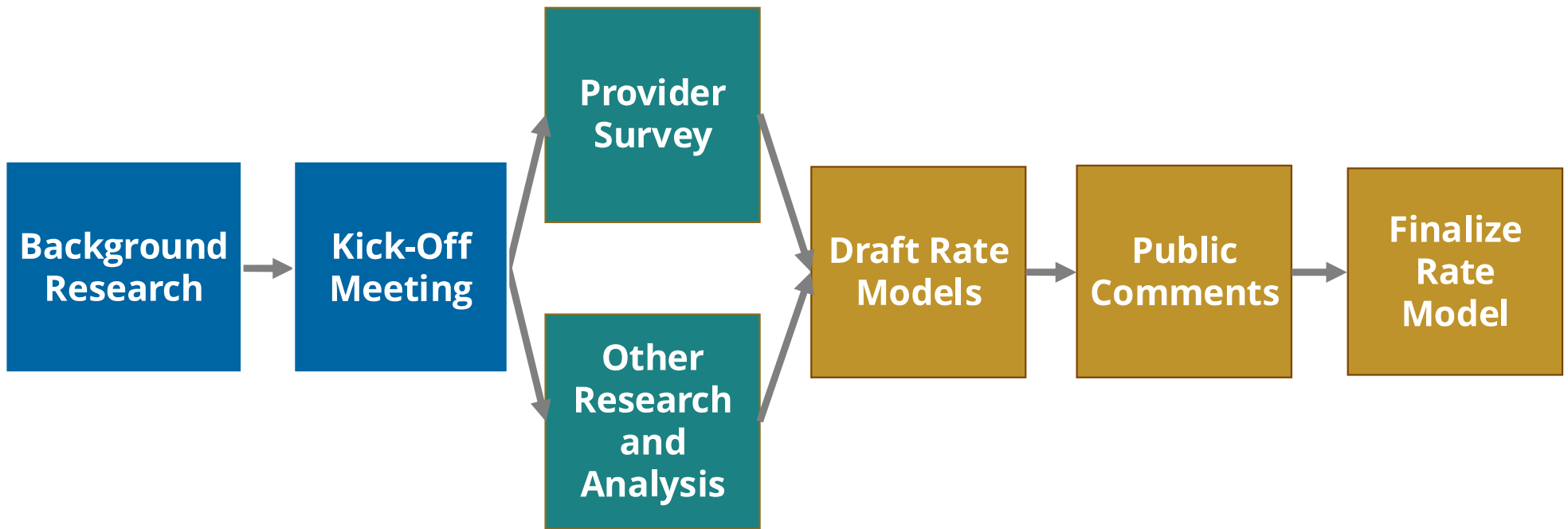
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- Program support
 - Activities that are program specific, but not billable
 - Examples: supervision, training, and program development
- Administration
 - Organizational costs that are not program-specific
 - Examples: executive management, accounting, and human resources
- Other costs vary by service
 - Examples: mileage, staffing ratios, program attendance rates, and program facility and supplies costs

Benefits of Independent Rates

- Transparency and Consistency
 - Models detail the factors, values, and calculations that produce the final rate
 - Providers offering the same service in the same area are paid the same rate
- Ability to Advance Policy Goals and Objectives
 - For example, improving direct care staff salaries or benefits, reducing staff-to-client ratios, incentivizing community-based services, etc.
- Efficiency In Maintaining Rates
 - For example, models can be adjusted for inflation, specific cost factors (e.g., IRS mileage rate), or to meet budget targets

Rate Study Process



Background Research and Kick-off Meeting

- “When you’ve seen one I/DD system...you’ve seen one I/DD system”

- Comprehensive review of the state’s service array
 - Review of state and federal requirements
 - Review of billing units and limitations
 - Identify possible revisions/modifications to services

- Meet with the state team as well as the rate advisory group
 - Present rate study approach
 - Discuss current services and rates as well as system strengths and challenges

Provider Survey

- Design and administration of survey to collect data regarding costs and service delivery issues (for example, direct care staff productivity, staffing ratios, and mileage)
 - Presented draft instrument to advisory group for feedback to ensure completeness and understandability
 - Results inform, but do not dictate, rate model assumptions
- Technical assistance
 - Written instructions
 - Recorded webinar to walk-through the survey
 - Dedicated contact for questions
- Analysis of survey results
 - Received surveys from 51 of 334 providers that accounted for 51 percent of funding for services delivered in fiscal year 2024
 - Performed desk reviews of submitted surveys
 - Performed statistical analyses

Other Research and Analysis

- Individual cost assumptions
 - State and federal statutes regarding payroll taxes
 - Utah specific wage data from Bureau of Labor Statistics and wage inflation data from Bureau of Economic Analysis
 - Utah specific health insurance data from the U.S. Department of Health and Human Services' Medical Expenditure Panel Survey (MEPS)
 - Internal Revenue Services' standard mileage rate
- For certain services, benchmarking against non-Medicaid service providers and comparable services in other states

Draft Rate Models

- Consider changes to service standards as well as billing units and requirements

- Develop rate model structures and populate with detailed service and cost assumptions
 - Consider provider survey and other independent data sources
 - Develop rate model appendices and other supporting documentation
 - Assumptions are not mandates (for example, a provider does not have to pay the wage assumed in the rate)

Public Comment and Finalize Rate Models

- Post rate models and supporting materials online
 - Present to providers and stakeholders
 - Record webinar to explain the proposals
- Accept written comments
- Review and summarize comments
- Revise and finalize recommendations

Summary of Draft Rate Study Recommendations



Summary – Rate Models

- HMA-Burns recommends the establishment of standardized independent rate models for most services
 - It is recommended that individual rate worksheets no longer be used
 - Increases consistency across providers and individuals and reduces administrative burden for providers, support coordinators, and DSPD
 - Provides a public accounting of individual cost assumptions and data sources
- On average, HMA-Burns recommends increase of about 26 percent for agency-managed services
 - DSPD will be provided an overall fiscal estimate based on the draft recommendations for their review, DSPD's review of the fiscal estimate may be incorporated into the final recommendations
 - Increases in recommended rates are driven primarily by DSP wage and benefit increases
 - Any increases to payment rates would require additional appropriated funding

Summary – Tiered Rates

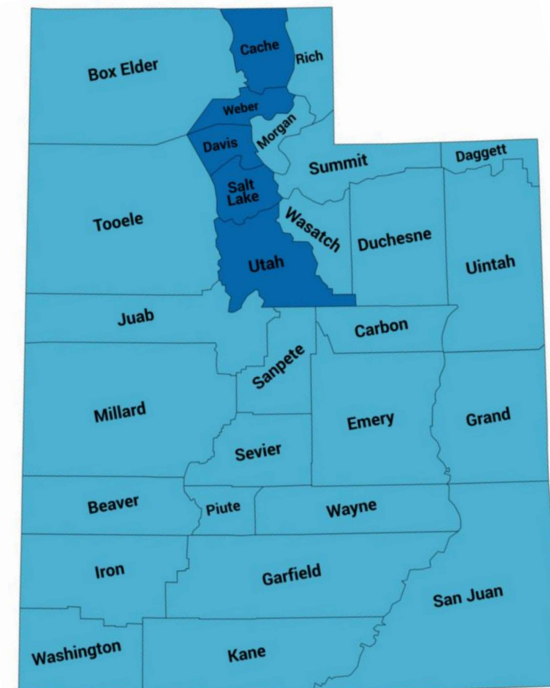
- For shared services, HMA-Burns recommends rates that are ‘tiered’ based on staffing levels / ratios
 - Applies to group home and day program services
- Longer-term, HMA-Burns recommends DSPD consider using an assessment to identify individual support needs that could then be used to assign individuals to a rate tier
- Since such an assessment is not currently in use, HMA-Burns recommends that rate tiers be assigned at the home / program level based on overall staffing
 - Rate paid for each individual in a given home / program would be the same since the rate will be based on overall staffing (which should reflect aggregate needs)
 - This does not suggest that programs should only serve individuals with similar needs
 - Service delivery would still be driven by person-centered planning

Summary – Regional Rates

- For most services, HMA-Burns recommends separate urban and rural rates are based on the county in which the service is delivered
 - Urban - Cache, Davis, Salt Lake, Utah, Weber
 - Rural - Beaver, Box Elder, Carbon, Duchesne, Daggett, Emery, Garfield, Grand, Iron, Juab, Kane, Millard, Morgan, Piute, Rich, San Juan, Sanpete, Sevier, Summit, Tooele, Uintah, Washington, Wasatch, Wayne

- Differences in rate model assumptions
 - Wage assumptions in urban rate models are 10 percent higher than in the rural models
 - Travel-related assumptions in rural rate models are 50 percent greater than in the urban models

- The differences in the wage and travel assumptions offset each other, resulting in mostly minor differences between rates



Wage Assumptions – Bureau of Labor Statistics Data

- Appendix A of the rate model packets
- Utah wage data published by the Bureau of Labor Statistics used as the starting point for establishing market-based wage assumptions
 - *Comprehensive.* Wage levels are published for more than 800 occupations based on data from 1.2 million establishments representing 57% of the employment in the United States
 - *Cross-industry.* It is not limited to a single industry so estimates for a given occupation are representative of the overall labor market
 - *Regularly updated.* Released once per year – in late March or early April for the previous May (so most recent data published in April 2025 reflects May 2024 survey data)
 - *State- (and local-) specific.* Data is published for individual states and sub-state regions ('metropolitan statistical areas')

Wage Assumptions – Bureau of Labor Statistics Data

- BLS wage data is inflated to January 2026
 - Uses data from the Bureau of Economic Analysis for net earnings growth in Utah
 - Models include 12.46 percent increase to BLS data based on 20 months at 7.3 percent (ten-year average)
- For each service, BLS occupations are chosen to represent staff qualifications
 - For some services, there is a direct match between the staff providing services and a specific BLS occupation (e.g., the BLS has a classification for first-line supervisors of personal services workers)
 - For other services, there is not a one-to-one match
 - For example, the BLS combines direct support professionals with staff in other industries in the home health and personal care aide classification
 - This classification may not represent the varied roles of DSPs so the rate models construct a weighted average of multiple BLS classifications

Wage Assumptions – DSP Wages

- Composite of BLS occupations used for DSPs

BLS Standard Occupational Classification	Weighting	Wage without Inflation	Wage with Inflation - Rural	Wage with Inflation - Urban
Home health and personal care aide (31-1120)	60.0%	\$17.29	\$19.44	\$21.38
Social and human service assistant (21-1093)	10.0%	\$19.47	\$21.90	\$24.09
Nursing assistant (31-1131)	10.0%	\$18.51	\$20.82	\$22.90
Psychiatric aide (31-1133)	10.0%	\$17.02	\$19.14	\$21.05
Recreation worker (93-9032)	10.0%	\$14.93	\$16.79	\$18.47
Total	100.0%	\$17.37	\$19.53	\$21.48

Wage Assumptions – DSP Wages (cont.)

- DSP wage assumption exceeds wages reported through the provider survey

Service	Provider Survey ¹ (No. of Surveys)	Recommended Rate Models		Percentage Difference	
		Urban	Rural	Urban	Rural
Residential Habilitation (RHS)	\$17.70 (13)	\$21.48	\$19.53	21%	10%
Supported Living (SLN, SLH)	\$18.65 (12)	\$21.48	\$19.53	15%	5%
Day Support (DSG, DSP, EPR, DSI)	\$17.95 (22)	\$21.48	\$19.53	20%	9%
Supported Employment (SEI, ISE)	\$17.36 (12)	\$25.94	\$23.58	49%	36%

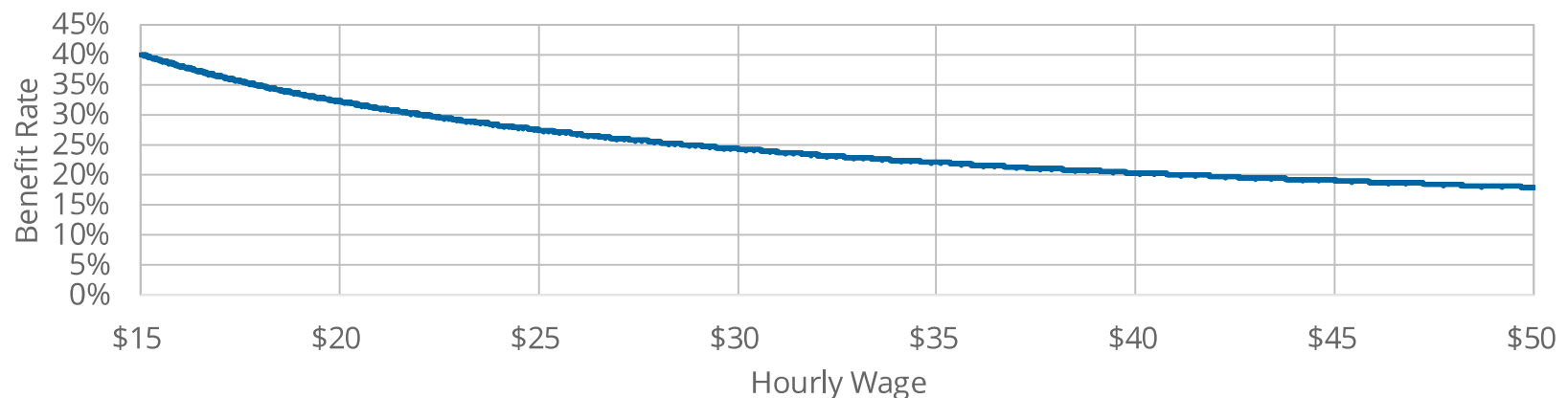
¹ Based on the calculated weighted average without outliers among employees, excluding employees reported as having supervisory responsibilities and contractors.

Payroll Tax and Fringe Benefit Assumptions

- Payroll taxes
 - Social Security and Medicare payroll
 - Federal Unemployment Insurance – 0.60 percent on first \$7,000 in wages
 - State Unemployment Insurance – 0.2 percent (new employer rate in 2025) on first \$48,900 in wages
 - Workers' compensation rate of 0.70 percent
- Benefit assumptions
 - 25 annual paid days off (holiday, vacation, and sick leave) (treated as a productivity adjustment)
 - \$739.80 per month for health insurance based on Utah specific data from U.S. DHHS' Medical Expenditure Panel Survey related to take-up rates, plan types (employee only, employee plus-one, and family), and employer costs
 - Assumes overall employee participation rate of 74 percent
 - Assumes a mix of plan types
 - \$75.00 per month for other benefits (e.g., vision, dental, retirement, etc.)

Payroll Tax and Fringe Benefit Assumptions (cont.)

- Benefit assumptions are translated to benefit rates by wage level
 - Paid time off is treated as a productivity adjustment (reduction in billable hours) rather than calculated as part of the benefit rate
 - Since certain benefit assumptions are fixed, the benefit rate declines as the wage increases
 - For example, the \$739.80 assumed for health insurance represents a larger percentage of the wage of someone making \$15.00 per hour than for someone earning \$50.00 per hour
- Benefit rate assumed in rate models, by wage level (excludes paid time off, which is incorporated as productivity adjustment)



Productivity Assumptions

- Productivity adjustments are intended to recognize costs associated with direct care workers' non-billable responsibilities
 - Ensures providers are compensated for activities that they cannot bill directly, such as the time direct support staff spend in training or traveling between service encounters
 - Example
 - An employee earning \$20 per hour (wages and benefits) and working 40 hours per week earns \$800 per week
 - However, if the employer can only bill for 32 hours per week, a productivity adjustment of 1.25 is required (work hours divided by billable hours)
 - Thus, the agency must be able to bill \$25.00 per service hour (\$20 multiplied by 1.25) to cover the cost of wages and benefits

Productivity Assumptions (cont.)

- Assumptions are detailed in Appendix C of the rate model packet
- Standard assumptions
 - All services include 200 annual hours for paid time off (25 days as noted in the benefits assumptions section, an average of 3.85 hours per week)
 - For services provided by direct support professionals, rate models include 40 annual hours for training (0.77 hours per week)
 - Most services include one hour per week for supervision and employer time
- Other productivity adjustments included in each rate model and the assumed amount of time spent on each are more variable across services
 - Travel between service encounters
 - Individual planning meetings
 - Program set-up and clean-up
 - Recordkeeping and reporting
 - Collateral contacts

Program Support Assumptions

- Program support funds activities that are program-specific, but not billable
 - Functions include supervision, training, program development and oversight, quality monitoring, nursing/ specialized supports, and coordination of care activities
 - Costs include wages and benefits of staff performing these functions, other expenses supporting these functions (e.g., facility-related costs, travel), insurance, etc.
- Program support assumption varies by rate models
 - Services that include more 'programming' (e.g., habilitative services) include \$25 per day
 - Other services include \$15 per day
- Overall program support equates to about 10 percent of the recommended rates
 - Since the recommended rates are about 26 percent greater than current rates, the program support *funding* in the rate model translates to about 12.6 of current rates
 - In comparison, provider survey respondents reported a program support rate of 9.2 percent

Administrative Assumptions

- Administration funds activities that are not program-specific
 - Examples include executive management, accounting, human resources
 - Costs include wages and benefits of staff performing these functions, other expenses supporting these functions (e.g., facility-related costs, travel), information technology costs, consulting expenses, etc.

- Rate models include 10 percent of the total rate for administration
 - Since the recommended rates are about 26 percent greater than current rates, the administrative *funding* in the rate model translates to about 12.6 of current rates
 - In comparison, provider survey respondents reported an administrative rate of 13.7 percent

Support Coordination (SCE)

- **Caseloads.** HMA-Burns recommends reducing maximum allowable caseload to reflect current operations and support quality care, while assuming a lower caseload in the rate models to give provide flexibility
 - Current DSPD standards allow caseloads of up to 46 cases while provider survey respondents reported an average caseload of 36
 - HMA-Burns recommends reducing the maximum allowable caseload to 40
 - Recommended rate models assume an average caseload of 35
 - Decrease from current reported average accounts for new contractual requirements
 - Setting the allowable caseload above the funded level allows providers some flexibility to account for turnover, on-ramping, differences in member acuity, etc.

Service	Rates (per month)		
	Current	Rec.-Urban	Rec.-Rural
Support Coordination	\$245.01	\$306.04	\$310.86

Residential Program Absences (344-Day Billing Year)

- Rate models for group homes and host homes are based on a 344-day billing year for all individuals
 - Currently, expected absences are determined on a person-by-person basis
 - HMA-Burns recommends adopting a 344-day billing year which applies the same absence factor across all individuals
- Dividing assumed annual costs (for 365 days of support) by 344 days results in a rate 6.1 percent greater than if the rate was calculated based on 365 days
 - Effectively spreads the cost of up to 21 absences over the 344 billable days
 - Number of absences intentionally set greater than actual to ensure providers are fully paid for almost all residents
 - Because a provider is paid for a full year of service after they bill 344 days, billing is limited to 344 days in a plan year
- Billing limit will reset if an individual changes providers during the year (but not if they change homes operated by the same provider)

Residential Program Absences (344-Day Billing Year) (cont.)

- Mathematically impossible for a provider to be worse off under a 344-day billing year than a 365-day billing year
- Example: 4-bed, level 4 home in an urban county has assumed annual cost of \$164,496 (which translates to \$450.67 per day or \$478.18 based on a 344-day billing year)

Days Present	Revenue at 344-Day Rate	Revenue at 365-Day Rate	Difference
365	\$164,494	\$164,494	\$0
355	\$164,494	\$159,987	\$4,506
344	\$164,494	\$155,030	\$9,463
330	\$157,799	\$148,721	\$9,078

Residential Habilitation Services (RHS)

- **Tiered rates.** Recommended group home rates are tiered based on the overall staffing level of the home
- **Rates vary by home size.** Recommended rates vary by home size
 - Higher per-person rates for smaller homes (although larger homes still receive greater total revenue because they are billing for more people)
 - Home size would be based on the home's determined capacity

	Weekly Hour Range				
	3 Person Home	4 Person Home	5 Person Home	6 Person Home	7+ Person Home
Level 1	168 – 200	168 – 200	168 – 200	168 – 200	6-Bed + 30 hrs/ person
Level 2	200 – 240	200 – 250	200 – 260	200 – 270	6-Bed + 40 hrs/ person
Level 3	240 – 280	250 – 300	260 – 320	270 – 340	6-Bed + 50 hrs/ person
Level 4	280 – 320	300 – 350	320 – 380	340 – 410	6-Bed + 60 hrs/ person
Level 5	320 – 360	350 – 400	380 – 440	410 – 480	6-Bed + 75 hrs/ person
Level 6	360 – 400	400 – 450	440 – 500	480 – 550	6-Bed + 85 hrs/ person

- **Exceptions.** An exceptions process would be available for homes that require more staffing than funded in the Level 6 rates (would replace use of Extended Living Supports, ELS)

Residential Habilitation Services (RHS) (cont.)

	3-Bed Home Rates		4-Bed Home Rates		5-Bed Home Rates		6-Plus-Bed Home Rates	
	Rec.-Urban	Rec.-Rural	Rec.-Urban	Rec.-Rural	Rec.-Urban	Rec.-Rural	Rec.-Urban	Rec.-Rural
Level 1	\$363.96	\$342.16	\$281.07	\$265.08	\$231.34	\$218.85	\$198.19	\$188.02
Level 2	\$436.76	\$409.34	\$342.51	\$321.76	\$285.95	\$269.24	\$248.24	\$234.20
Level 3	\$509.57	\$476.54	\$410.75	\$384.76	\$351.47	\$329.71	\$311.95	\$293.00
Level 4	\$582.37	\$543.72	\$479.01	\$447.74	\$416.99	\$390.18	\$375.64	\$351.79
Level 5	\$655.18	\$610.91	\$547.26	\$510.73	\$482.51	\$450.65	\$439.35	\$410.58
Level 6	\$727.97	\$678.10	\$615.51	\$573.72	\$548.03	\$511.12	\$503.05	\$469.36

- Current average daily rate is \$271.34

Residential Habilitation Svcs. (RHS) – Policy Considerations

- **Initial determination of staffing level.** Processes to document staffing plan for each home as part of the transition to the new payment framework
- **Service authorization guidelines.** Since the staffing plan would be determined at the home level, providers would bill the same rate for all residents within a given home
 - Recommended payment model evenly spreads the cost of the home staffing over all residents (so that the provider is fully paid for the supports provided) although some residents will require more intensive support than others in the home
- **Monitoring.** Oversight of compliance with funded staffing levels
- **Changes to staffing level.** Standards for how frequently programs can change their staffing plan (and rate)

Host Home and Professional Parent Supports (HHS, PPS)

- **Standardized rates.** HMA-Burns recommends a standard rate for Host Home and Professional Parent Supports
- **Unbundling agency supports.** HMA-Burns recommended rate models “unbundle” in-home support hours provided by agency staff from the Host Home and Professional Parent Support rates
 - It is recommended that provider staff supports be authorized as a new “Additional Supports” service, billed in 15-minute units based on the amount of support actually provided
- **Minimum payment to home providers.** HMA-Burns recommends that agencies be required to pay their contracted home providers at least the amount assumed in the rate model (\$160 per day)

Service	Rates		
	Current	Rec.-Urban	Rec.-Rural
Host Home / Prof. Parent Supp. (per day at 344 days)	\$225.73 ¹	\$240.51	\$241.60
HHS and PPS Additional Support (per 15 min.)	N/A	\$10.38	\$10.11

¹Represents average current rate, but does not account for impact of unbundling agency supports

In-Home Supports

- **Rate standardization.**
 - Recommend standardizing rates for Supported Living-Hourly (SLH) and Supported Living-Natural Supports (SLN)
 - Recommend standardizing rates for Attendant Care (ACA) and Personal Assistance (PAC)
 - Recommend same rates for Chore (CHA) and Homemaker (HSQ), as is current practice
- **15-minute billing.** HMA-Burns recommends eliminating daily rates for these services
- **Multi-person / multi-staff rates.** Recommended rate models for several services includes two-to-one rates and shared (one-to-two and one-to-three) rates (not displayed below, see rate model packet)

Service	Rates (per 15 minutes)		
	Current	Rec.-Urban	Rec.-Rural
Supported Living-Hourly (SLH)	\$9.16	\$11.91	\$11.95
Supported Living-Natural Supports (SLN)	\$8.27		
Attendant Care (ACA)	\$9.67	\$11.42	\$11.45
Personal Care (PAC)	\$5.73		
Chore (CHA) and Homemaker (HSQ)	\$6.65	\$9.65	\$9.42
Companion (COM)	\$6.30	\$10.57	\$10.65

Respite (RP2, RP3, RP4, RP5, Medical Respite)

- **Rates vary by setting.** HMA-Burns recommends different rates for home-based respite (whether the individual's home or the caregiver's home) and respite provided in a provider's facility
 - Respite Facility rate models assume a typical 1:3 ratio
- **Elimination of separate intensive services.** With the overall significant recommended rate increase for Respite, HMA-Burns recommends that intensive services be consolidated into the standard service
 - Consistent with other paraprofessional services, which do not have intensive rates
- **New Medical Respite Facility service.** HMA-Burns recommends to create a new Medical Respite Facility service, which assumes front-line staff are certified nursing assistants and there is one full-time nurse for every 12 front-line staff
- **Continuation of daily and 15-minute rates.** Consistent with current guidelines, 15-minute rates billed for up to 6 hours per day while the daily rate applies to longer encounters
 - Daily rates assume 16 hours of staff time (assuming the other eight hours are unpaid sleep time)
 - For home-based respite, HMA-Burns recommends setting the daily rate at 110 percent of the recommended Host Home rate

Respite (RP2, RP3, RP4, RP5, Medical Respite) (cont.)

Service	Rates (per 15 minutes)			Rates (per day)		
	Current	Rec.-Urban	Rec.-Rural	Current	Rec.-Urban	Rec.-Rural
Home-Based Respite (RP2, RP3)	\$4.58,\$5.72	\$10.10	\$9.57	\$110.42,\$137.06	\$264.56	\$265.76
Facility-Based Respite (RP4, RP5)	NA	\$4.52	\$4.25	\$123.94,\$150.58	\$258.08	\$241.19
Medical Respite Facility	NA	\$5.82	\$5.48	NA	\$302.68	\$282.94

Respite Camp (RPS)

- **Front-line (counselor) staffing.** Recommended rate models assume a one-to-three staffing ratio
 - Assumed wage equal to the assumption for direct support professionals
- **Other program staff.** Recommended rate models include assumptions for other program staff

Position	# of Participants per Staff
Recreational Therapist	30
Registered Nurse	48
Kitchen Staff	16
Maintenance Staff	32

- **Other cost assumptions.** Recommended rate models include assumptions for lodging space, food, and accreditation fees
- **Daily and 15-minute rates.** HMA-Burns recommends 15-minute rates for up to 6 hours per day and a daily rate for overnight supports
 - Daily rates assume 16 hours of staff time (assuming the other eight hours are unpaid sleep time)

Service	Rates (15 minutes)			Rates (per day)		
	Current	Rec.-Urban	Rec.-Rural	Current	Rec.-Urban	Rec.-Rural
Respite Camp (RPS)	NA	\$5.83	\$5.49	Varies	\$280.83	\$262.93

Respite Camp-Enhanced

- ***New enhanced service.*** HMA-Burns recommends establishing a new, 'enhanced' camp service and rate
 - Enhanced camps offer a range of activities such as hippotherapy, climbing/obstacle courses, nature education and exploration, swimming, canoeing, hiking, arts and crafts, sports, as well as team-building activities and offsite events in community-based locations
 - Individuals stay overnight at the camp
 - Activities are individualized and goal oriented
- HMA-Burns researched camp rates paid by other states' waivers to establish a recommended rate
 - Recommended rate is set at approximately the 75th percentile of the benchmark rates (meaning that the rate is greater than those of three-quarters of the other identified rates)
 - Rate would apply statewide (no separate rates for urban and rural counties)

Service	Rates (per day)	
	Current	Recommend
Enhanced Respite Camp	N/A	\$340.00

Day Support (DSG / DSP) / Employment Preparation (EPR) Group Supported Employment (SED)

- **15-minute billing.** HMA-Burns recommends that Day Support services transition to 15-minute billing so that providers are paid based on the amount of support they deliver
- **Tiered rates based on staffing ratios.** HMA-Burns recommends establishing tiered rates that vary based on a program's staffing ratio
 - Programs would designate their staffing ratio and would bill the same rate for everyone in that program
 - Ratios reflect an average, and it is expected that some individuals will receive more intensive supports and others will receive less intensive support
 - Policies would be developed for assigning a program ratio, performing oversight, and approving changes
- **Rates vary by setting (Day Support only).** HMA-Burns recommends separate rates for center-based and community-based services
 - Higher rates for community-based services due to vehicle costs and higher program support rate
 - Individuals may receive both center-based and community-based supports on the same day

Level	Staffing Ratio
Level 1	1:6
Level 2	1:5
Level 3	1:4
Level 4	1:3
Level 5	1:2

Day Supports (DSG / DSP)

Level	Ratio	Rates (per 15 minutes)				Daily Equivalent (based on 6 hours)		
		Center-Based		Community Based		Current	Rec.- Center- Urban	Rec.- Comm. - Urban
		Rec.-Urban	Rec.-Rural	Rec.-Urban	Rec.-Rural			
Level 1	1:6	\$3.02	\$2.88	\$3.65	\$3.58	\$49.85	\$72.48	\$87.60
Level 2	1:5	\$3.37	\$3.20	\$4.03	\$3.94	NA	\$80.88	\$96.72
Level 3	1:4	\$3.90	\$3.68	\$4.59	\$4.49	\$69.14	\$93.60	\$110.16
Level 4	1:3	\$4.78	\$4.50	\$5.55	\$5.42	\$88.42	\$114.72	\$133.20
Level 5	1:2	\$6.60	\$6.18	\$7.51	\$7.32	\$127.00	\$158.40	\$180.24

Employment Preparation Services (EPR)

Level	Ratio	Rates (per 15 minutes)		Daily Equivalent (based on 6 hours)		
		Rec.-Urban	Rec.-Rural	Current	Rec.-Urban	Rec.-Rural
Level 1	1:6	\$2.53	\$2.87	NA	\$60.72	\$68.88
Level 2	1:5	\$2.88	\$3.18	NA	\$69.12	\$76.32
Level 3	1:4	\$3.39	\$3.66	\$69.14	\$81.36	\$87.84
Level 4	1:3	\$4.26	\$4.47	\$88.42	\$102.24	\$107.28
Level 5	1:2	\$6.05	\$6.14	\$127.00	\$145.20	\$147.36

Group Supported Employment (SED)

Level	Ratio	Rates (per 15 minutes)		Daily Equivalent (based on 6 hours)		
		Rec.-Urban	Rec.-Rural	Current	Rec.-Urban	Rec.-Rural
Level 1	1:6	\$3.54	\$3.44	\$55.67	\$84.96	\$82.56
Level 2	1:5	\$3.98	\$3.86	\$55.67	\$95.52	\$92.64
Level 3	1:4	\$4.63	\$4.49	\$55.67	\$111.12	\$107.76
Level 4	1:3	\$5.75	\$5.56	\$55.67	\$138.00	\$133.44
Level 5	1:2	\$8.03	\$7.75	\$55.67	\$192.72	\$186.00

Motor Transportation (MTP)

- **Maintain daily rate.** Recommended rate model structure maintains a daily rate (effectively a round trip)

Service	Rates (per day)		
	Current	Rec.-Urban	Rec.-Rural
Motor Transportation (MTP)	\$20.80	\$25.10	\$33.52

Day Supp., Individual (DSI) / Integrated Community Learning (ICL)

- **Standardization of DSI and ICL rates.** Given similarity in service definitions and staff qualifications, HMA-Burns recommends to standardize payment rates for Day Support, Individual and Integrated Community Learning
- **15-minute billing for ICL.** As part of the standardization of rates, HMA-Burns recommends that ICL be billed in 15-minute increments rather than a daily rate to ensure providers are paid for the amount of support they provide
- **Shared staff rates for ICL.** HMA-Burns recommends one-to-two and one-to-three rates for ICL (see rate model packet for draft rates)

Service	Rates (per 15 minutes)		
	Current Average	Rec.-Urban	Rec.-Rural
Day Support, Individual (DSI)	\$12.04	\$12.74	\$13.16
Integrated Community Learning (ICL)	\$12.66 ¹	\$12.74	\$13.16

¹ The average daily rate was converted to 15-minute units presuming 6 hours of service.

Individual Supported Employment (PSB, JDS, SEE, ISE, SEI)

- **Differentiating between Job Development and Job Coaching.** HMA-Burns recommends to split Supported Employment (SEI) services into Job Development and Job Coaching rates
 - HMA-Burns also recommends aligning Self-Employment (SEE) rates with Job Development
- **Standardizing rates across programs.** HMA-Burns recommends the same Job Development and Job Coaching rates across programs (rates are already very similar)
- **Outcome-based rates.** Longer-term, HMA-Burns recommends DSPD consider outcome-based payments with tiers tied to an individual's assessed needs

Service	Rates (per 15 minutes)		
	Current	Rec.-Urban	Rec.-Rural
Pre-Employment Skill Building (PSB)	\$14.87	\$17.47	\$17.10
Job Development (JDS)	\$14.87		
Supported Employment (SEI)-job development tasks	\$11.01 ¹		
Supported Employment, Self-Employment (SEE)	\$13.53	\$14.34	\$14.47
Individual Supported Employment (ISE)	\$13.55		
Supported Employment (SEI)-job coaching tasks	\$11.01 ¹		

¹ Reported rate for SEI is the average rate paid in FY 2024.

Personal Budget Assistance (PBA)

- **Elimination of session rate.** HMA-Burns recommends all PBA services be billed at the 15-minute rate
- **Staff assumptions.** Rate models assume staff providing PBA have some financial background (though not as a certified or licensed professional) so the wage assumption is higher than for DSPs

Service	Rates (per 15 minutes)		
	Current	Rec.-Urban	Rec.-Rural
Personal Budget Assistance	\$9.16	\$11.88	\$10.98

Behavioral Consultation (BC1, BC2, BC3)

- **Wage benchmarks based on staff requirements.** Wage assumptions in the recommended rate models are based on the education, training, and supervision requirements for staff offering each level of service
 - BLS occupations do not offer precise fits for these services (as with some other services) so behavioral healthcare and social work occupations were used
 - BC1 – substance abuse / mental health counselor (bachelor’s level, salary of \$74,000)
 - BC2 – healthcare social worker (master’s level, salary of \$81,000)
 - BC3 – psychologist (classification used for BCBAs, doctorate level, salary of \$100,000)

Service	Rates (per 15 minutes)		
	Current	Rec.-Urban	Rec.-Rural
Behavior Consultation – Level 1	\$8.67	\$20.71	\$19.06
Behavior Consultation – Level 2	\$14.83	\$21.69	\$20.46
Behavior Consultation – Level 3	\$22.68	\$25.22	\$23.69

Medication Monitoring (PM1, PM2)

Service	Rates (per 15 minutes)		
	Current	Rec.-Urban	Rec.-Rural
Licensed Practical Nurse (PM1)	\$8.32	\$18.75	\$17.75
Registered Nurse (PM2)	\$12.03	\$24.09	\$23.14

Massage Therapy (SSM)

- **Rate benchmarks.** Recommended rates based on research of commercial rates charged by licensed massage therapists in greater Salt Lake City area
 - Also reviewed rates paid by the few other states that cover massage therapy services in their waiver programs (generally pay \$80-85 per hour)
- **Higher home-based rates.** HMA-Burns recommends a higher rate for in-home services to account for travel time and lower productivity

Service	Rates (per hour or 4 15-min. units)		
	Current	Facility	In home
Massage Therapy (SSM)	\$61.16	\$100.00	\$130.00

Consumer Prep. (CPS) / Family Training and Prep. (TFA / TFB)

- **Standardization of CPS and TFA rates.** HMA-Burns recommends aligning rates for Consumer Preparation Services and Family Training and Preparation Services (TFA)
 - The recommended rate for Family and Individual Training and Preparation (TFB) is higher to reflect the greater staff qualifications

Service	Rates (per 15 minutes)		
	Current	Rec.-Urban	Rec.-Rural
Consumer Preparation Services (CPS)	\$6.16	\$12.64	\$12.78
Family Training and Preparation (TFA)	\$6.09	\$12.64	\$12.78
Family and Individual Training and Preparation (TFB)	\$8.67	\$16.19	\$16.17

Financial Management Services (FMS)

- **Rate benchmarks.** Recommended rate based on a comparison to other states' rates for Financial Management Services (FMS)
 - A 2022 evaluation by Applied Self Direction report identified costs reported in 49 aging and developmental disabilities waivers across 15 states
 - Recommended rate based on the median with an inflationary adjustment

Service	Rates (per month)	
	Current	Recommended
Fiscal Management Services (FMS)	\$100.00	\$130.00

Self-Administered Services (SAS)

- ***Aligning compensation assumptions.*** Recommended rates for Self-Administered Services (SAS) based on compensation assumptions in the corresponding rate model for agency-managed services
 - Begins with same wage assumption from the corresponding agency rate model
 - Adds the value of paid time off, health insurance, and other optional benefits (with the assumption that a higher wage offsets the lack of benefits)
 - Payroll taxes (for example, FICA and unemployment insurance) would be added to the rates

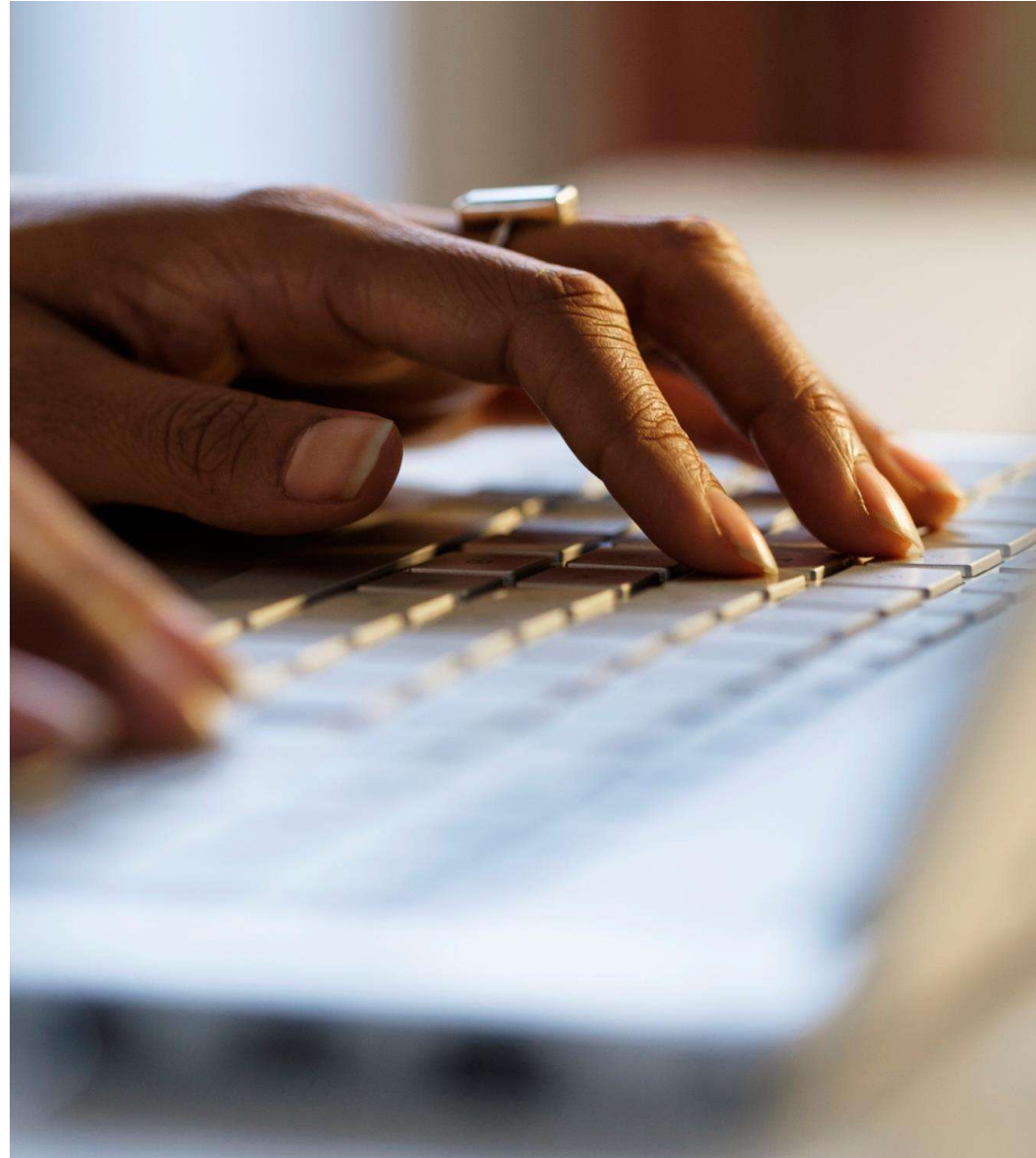
Self-Administered Services (SAS)

Service	Rates (per 15 minutes)		
	Current	Rec.-Urban	Rec.-Rural
Supported Living (SL1)	\$6.23	\$6.90	\$6.37
Attendant Care (AC1, AC2, AC3, AC4)	\$5.85,\$6.57	\$6.90	\$6.37
Personal Assistance (PA1, PA2, PA3)	\$4.73	\$6.90	\$6.37
Companion (CO1)	\$5.19	\$6.48	\$5.99
Chore (CH1)	\$5.50	\$6.67	\$6.16
Homemaker (HS1)	\$5.50	\$6.67	\$6.16
Respite (RL1, RP1)	\$4.69,\$4.41	\$6.90	\$6.37
Individual Supported Employment (IS1)	\$11.29	\$8.11	\$7.47
Family Training and Preparation (TF1)	\$5.04	\$7.61	\$7.01

DHHS/DSPD Considerations

- DHHS/DSPD is grateful for the work completed by HMA/Burns.
- As a reminder, legislative appropriations would be needed for any rate increases.
- If funding is appropriated for any rate increase DHHS/DSPD intends to implement additional quality components as part of the rate increase.
- DHHS/DSPD may consider including quarterly or annual hour caps for some service rates.

Next Steps



Public Comments

- Draft analysis is published for public comment at <https://www.healthmanagement.com/burns-reports/dspd-rate-study/>
- Webinar will be recorded to walk-through recommendations
- Written comments should be submitted to **DSPDRateStudy@healthmanagement.com** will be accepted until October 3, 2025
- All comments will be reviewed and summarized
 - Consolidated document of comments and responses will be published
- Revise analysis based on public comments as warranted