

# Self Direction Assistance Guidelines

## Self Direction Assistance (SDA)

The Centers for Medicare and Medicaid Services (CMS) published Home and Community Based Services Regulations on January 16, 2014. These Regulations became effective on March 17, 2014 and impacts all 1915c Home and Community Based Waivers; this includes all three Division of Developmental Disability (DDD) Waivers. The Regulations address 3 main requirements, one of which is *Conflict of Interest Free Case Management*. This means that Case Management cannot be provided by a relative of the person served, a provider agency, someone employed by a provider agency, someone who has a financial interest in a provider or someone who would benefit from providing services. In Illinois, the Independent Service Coordination (ISC) agencies fulfill the Conflict of Interest Free Case Management duties. As case managers, the ISCs are responsible for determining eligibility, identifying providers of choice, developing the Personal Plan, resolving conflict and monitoring the health, welfare and safety of the individual.

Within the 2014 Home and Community Based Services Regulations, CMS introduced a new service titled *Information and Assistance in Support of Participant Direction*. The DDD refers to this service as Self-Direction Assistance (SDA). SDA is only available to those in the Home Based Supports and Services (HBS) program and should not duplicate the services provided by the ISC. SDA is an optional service, meaning that individuals/families are not required to purchase this support. The acronym SDA is used to describe the service (Self-Direction Assistance) as well as the provider agency staff (Self-Direction Assistant). Provider agency staff fulfilling the role of the SDA are required to be Qualified Intellectual Disability Professionals (QIDPs).

## Services

SDA assists the individual (or the individual's family or representative, as appropriate) in arranging for, directing and managing services. It also offers practical skills training to enable individuals and families to independently direct and manage Waiver services. SDA includes providing information to ensure that individuals understand the responsibilities involved with directing their services. In general, the activities provided under SDA must be consistent with Federal CMS regulations, not duplicate ISC activities and be a good use of taxpayer dollars.

SDAs do not have a mandated set of services that they are required to provide. Each service provided must be at the request of the individual, family and/or guardian. With this in mind, the activities below (as indicated by "Allowed" on the grid) are billable services that can be provided by an SDA. All billable services must be agreed upon by the individual, family and/or guardian, as well as the SDA.

If an individual/family desires or needs the support of a SDA, this must be documented in the Personal Plan, including the amount and frequency of services. In addition, the provider agency must complete a Provider Signature Page of the Personal Plan. On the Provider Signature Page the agency must list Self-Direction Assistance as a service, indicate any outcomes from the Plan that this agency will address and sign this page. Provider agencies have 10 calendar days to return the completed Provider Signature Page to the ISC. Provider agencies are not required to develop an Implementation Strategy for SDA services. If an individual/family purchases SDA services, the details of what will be provided should be included in the Employer of Record Implementation Strategy. As requested, the SDA can assist the HBS Employer of Record with developing the *Employer of Record Implementation Strategy* form.

## Billing and Audit Trail

The details of what SDAs provide to an individual/family must be based on the desired outcomes as well as the needs of the individual reflected in the Personal Plan. Services provided and billed must be within the description outlined by the DDD. The cost of SDA services comes from the individual's monthly HBS allotment and must be reflected through a HBS Service Agreement. There is no monthly minimum for SDA. The maximum billable amount for an individual must remain within the monthly allotment. Providers may negotiate additional hours if necessary. SDA must be billed through the Reporting of Community Services (ROCS) using the bill code 55A. The most current rate can be found on the DHS website at <http://www.dhs.state.il.us/page.aspx?item=109260>

Monthly notes, often referred to as Q or QIDP Notes, are not required when providing SDA. SDA provider agencies must maintain a detailed chronological log of all activities performed for audit purposes and to verify their billing. This documentation must be maintained in the individual's record.

	Are SDAs allowed to provide and bill this service?	Allowed/Not Allowed	Notes:
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	Are SDAs allowed to provide and bill this service?	Allowed/Not Allowed	Notes:
1	Developing the Personal Plan and updating it at least annually	Not allowed	This is an ISC/case management responsibility.
2	Meeting with ISC for Discovery and/or Personal Plan	<b>Allowed</b>	N/A
3	Providing case management type services (i.e. locating other Waiver providers)	Not allowed	This is an ISC/case management responsibility.
4	Conducting monitoring visits to ensure implementation of the Personal Plan; to ensure the health welfare & safety of participant	Not allowed	This is an ISC/case management responsibility. SDA does not conduct monitoring visits but can visit the individual/family home to provide services. The location in which the SDAs provide their services should be mutually agreed upon between the individual/family and SDA provider.
5	Notifying individual/family of their Waiver rights and right to appeal on forms 1201 and 1202	Not Allowed	This is an ISC/case management responsibility.
6	Assisting with the Medicaid Spenddown forms (HFS-2653) and submitting to the DHS Family Community Resource Center	<b>Allowed</b>	N/A
7	Developing the SDA provider's Implementation Strategy	Not Allowed	SDAs are not required to develop an Implementation Strategy.
8	Documenting notes to support billing on the SDA services provided	<b>Allowed</b>	A SDA agency must maintain an adequate audit trail.

	Are SDAs allowed to provide and bill this service?	Allowed/Not Allowed	Notes:
9	Assisting Employer of Record to complete their Implementation Strategy form.	<b>Allowed</b>	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 assist with providing a copy of the form to the ISC. The SDA can also complete the form on behalf of the individual/family if requested.
10	Providing information on and assistance in recruiting, hiring, managing PSWs; PSW qualifications, passing background checks, definition of Personal Support, role of fiscal/employer agent (ACES\$) when the individual/family is considering hiring PSWs directly	<b>Allowed</b>	N/A
11	Reviewing Personal Support Workers (hired directly by individual/family) notes to complete a monthly implementation strategy	Not Allowed	Reviewing PSW notes is not required.
12	Assisting or training on billing for the PSWs each month	<b>Allowed</b>	The SDA can train or assist an individual/family on billing for PSWs who are hired directly by the individual/family. ACES\$ will process time sheets for all PSWs hired directly by the individual/family.
13	Providing training and assistance to individuals and families regarding timekeeping and other employer related tasks for PSWs <i>hired directly by the individual/family</i>	<b>Allowed</b>	N/A

	Are SDAs allowed to provide and bill this service?	Allowed/Not Allowed	Notes:
14	Providing training and assistance to individuals and families regarding timekeeping and other employer related tasks for <i>agency based</i> PSWs	Not allowed	The SDA should not bill the code 55A when tasks are associated with agency based PSWs. It is the Division's expectation that the supervisory role/cost for agency based PSWs will be covered by the negotiated PSW rate and not be billed through SDA.
15	Assisting with completing Service Agreements for all waiver services	<b>Allowed</b>	This includes Service Agreements beyond SDA and PSW.
16	Updating Service Agreements when changes occur	<b>Allowed</b>	N/A
17	Assisting with managing the monthly budget	<b>Allowed</b>	N/A
18	Sending Service Agreements and PSW timesheets to ACES\$	<b>Allowed</b>	N/A
19	Working with providers and ACES\$ as necessary to adjust bills that are incorrect	<b>Allowed</b>	N/A
20	Reviewing agency based PSW notes in response to the implementation strategy	Not allowed	The SDA should not bill the code 55A when tasks are associated with agency based PSWs. It is the Division's expectation that the supervisory role/cost for agency based PSWs will be covered by the negotiated PSW rate and not be billed through SDA.
21	Assisting with communication and problem-solving strategies for PSWs hired directly by the individual/family	<b>Allowed</b>	N/A

	Are SDAs allowed to provide and bill this service?	Allowed/Not Allowed	Notes:
22	Assisting with communication and problem-solving strategies for <i>agency based</i> PSWs	Not allowed	The SDA should not bill the code 55A when tasks are associated with agency based PSWs. It is the Division's expectation that the supervisory role/cost for agency based PSWs will be covered by the negotiated PSW rate and not be billed through SDA.
23	Providing training to individual, family, or PSW to increase individual's skill-acquisition	<b>Allowed</b>	May include development and training of individual's routine-based schedules, task analyses for life skills, and social skills training to then be implemented by the family or PSW.
24	Providing training to individual, family, or PSW on individual's behavior reduction	Not allowed	If assistance is needed or desired, the individual, family or guardian can purchase behavioral supports.
25	Reviewing behavior strategies	Not allowed	ISC should review.
26	Assisting with prior approval request (i.e. Adaptive Equipment, Assistive Technology, Home & Vehicle Modifications, Temporary Assistance, Therapies)	<b>Allowed</b>	The SDA can assist with gathering the necessary information to support the request and making the ISC aware of the need. The ISC must complete the request form, ensure all required documents are present, submit the form to the Division and ensure the service is reflected in the Plan.

	Are SDAs allowed to provide and bill this service?	Allowed/Not Allowed	Notes:
27	Acting as the Representative Payee for SS Benefits. Assisting the individual/family to maintain financial 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	<b>Allowed</b>	Ideally, the individual, guardian or Representative Payee should oversee these tasks.
28	Advocating (professional level staff), communicating and facilitating effectively; maintain positive working relationships with collaborating service providers, medical providers, housing providers, bank staff, pharmacies, attorneys, etc.	<b>Allowed</b>	N/A
29	Providing medical advocacy - consistent staff who knows medical history to help schedule, attend, and advocate at appointments and during medical emergencies	<b>Allowed</b>	Medical emergencies should be directed to call 911 as needed.
30	Being available or responding to after hours or emergency situations, medical or otherwise	<b>Allowed</b>	Medical emergencies should be directed to call 911 as needed.
31	Assisting with refilling medication and/or linkage to pharmacy services	<b>Allowed</b>	The Individual/family can also purchase Nursing services (55N) to assist with this service.
32	Assisting individual/family in acquiring needed medical supplies through insurance or other measures	<b>Allowed</b>	PSW can also help obtain these supplies.
33	Assisting with housing/Landlord, 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	<b>Allowed</b>	The ISC can assist with waitlist applications for housing.
34	Assisting with utilities, phone, cell phone, cable, internet acquisition and use, troubleshooting	<b>Allowed</b>	PSW can assist also.
35	Assisting with benefit and charity applications, Energy assistance, child care subsidy applications, Lifeline, Christmas programs, Meals on Wheels - type programs	<b>Allowed</b>	PSW can provide day to day supports.

	Are SDAs allowed to provide and bill this service?	Allowed/Not Allowed	Notes:
36	Assisting with employment/educational supports, Division of Rehabilitation Services appointments, acquiring uniforms, non-skid shoes, etc.; school applications, scheduling, consultation with teachers and counselors as needed, Financial Aid applications	<b>Allowed</b>	The ISC is responsible for the referral to DRS. SDA, natural support or PSW can assist with obtaining necessary items (i.e. uniforms, non-skid shoes, etc.) and completing paperwork (school application/registration, schedules). Non-Medical Transportation (55T) can be used for transportation to DRS office.
37	Assisting with interaction with law enforcement & courts	<b>Allowed</b>	In addition, the ISC should become involved as directed by the Division guidelines. A referral to Equip for Equality should be made when necessary.
38	Acquiring food, clothing and household needs when finances are low or absent	<b>Allowed</b>	PSWs can assist with day to day task. The ISC must be notified if situation rises to a crisis.
39	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.	Not allowed	The Individual/family should oversee these activities. Can also include other natural supports or PSW.
40	Assisting with Self-advocacy and training - annual trips to Speak UP/Speak Out Summit, other statewide and local self-advocacy activities	Not allowed	The Individual/family should oversee these activities. Can also include other natural supports or PSW.
41	Providing emotional support and companionship - many have no family and/or very few friends or natural supports; long-term relationships with agency staff	Not allowed	Natural supports or PSW can assist.

	Are SDAs allowed to provide and bill this service?	Allowed/Not Allowed	Notes:
42	Assisting with acquiring pets, care training and vet appointments	Not allowed	The need for a service animal should be identified in the Personal Plan. The Individual/family should oversee these activities. Can also include other natural supports or PSW.
43	Computer/tablet acquisition and lessons to use technology safely	<b>Allowed</b>	<p>The ISC is responsible for making a formal request to the Division for Assistive Technology when warranted; this need must also be identified in the Plan. The SDA can assist with gathering the necessary information to support the request and making the ISC aware of the need.</p> <p>Note: The waiver does not fund tablets, computers or smart phones. Request for communication software and devices can be submitted for review through the prior approval process.</p>
44	Acquiring free bus passes, gym memberships, etc.	<b>Allowed</b>	PSW can also assist with these tasks.
45	Providing IEP Advocacy	<b>Allowed</b>	N/A
46	Providing relationship support - assist with developing relationships with others through social activities, planning dates, transportation, sex education, assistance with acquiring birth control.	Not allowed	These tasks should be accomplished by using natural supports or a PSW



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47	Providing parenting skills training and assistance	Not allowed	This task should be accomplished by using natural supports or a PSW
48	Assisting with end of life planning/care, pre-planning and arrangements for clients and/or loss of their family members	<b>Allowed</b>	Can also use natural supports; if not available then the FCRC/local office and ISC can assist.
49	Providing Non-medical transportation - many people live outside of bus routes and rely on staff for transportation.	Not allowed	Individuals enrolled in HBS Waiver can purchase Non-medical transportation (55T) where available.