



July 17, 2023

Marie Costello
Acting Deputy Administrator and Director
Center for Medicaid & CHIP Services (CMCS)
7500 Security Blvd
Baltimore, MD 21244

Dear Acting Deputy Administrator and Director Costello:

The State of Georgia, through the Department of Community Health (DCH), is pleased to submit its Quarterly HCBS Spending Plan and Narrative Statement. Pending final approval, we attest to the following:

1. The state is using the federal funds attributable to the increased FMAP to supplement and not supplant existing state funds expended for Medicaid HCBS in effect as of April 1, 2021.
2. The state is using the state funds equivalent to the amount of federal funds attributable to the increased FMAP to implement or supplement the implementation of one or more activities to enhance, expand, or strengthen HCBS under the Medicaid program.
3. The state is not imposing stricter eligibility standards, methodologies, or procedures for HCBS programs and services than were in place on April 1, 2021.
4. The state is preserving covered HCBS, including the services themselves and the amount, duration, and scope of those services, in effect as of April 1, 2021.
5. The state is maintaining HCBS provider payments at a rate of no less than those in place as of April 1, 2021.

As previously indicated, the additional funding will be used to enhance, expand, and strengthen home and community-based services (HCBS) under the Medicaid program using an estimated \$203,515,338 million in additional funds associated with the increased Federal Medicaid Assistance Percentage (FMAP) pursuant to Section 9817 of the American Rescue Plan Act of 2021 (ARPA).

The Department has modified its initial spending plan following the Quarterly Spend Plan Narrative submitted for FFY2023 Q3. The modifications are as follows:

CNA Workforce Expansion: Georgia will remove the CNA workforce expansion initiative and reallocate funding to other initiatives as needed. The work envisioned for this initiative will continue in some capacity through a separate State funding source.

Transitional Age Young Adult Services: A slight modification was made to the



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original narrative language. The new language clarifies that initiative funds will provide service pilot development and training for providers.

Assess Current State of HCBS Workforce Retention, Recruitment, and Development: This initiative is removed and funding will be reallocated to separate initiatives as needed. DCH leadership determined that previously conducted assessments have gathered sufficient information on the HCBS workforce and this initiative is no longer needed.

The Department intends to sustain its ARPA HCBS initiatives as follows:

1. **Enhancement and expansion of HCBS infrastructure:** Georgia plans to continue to support this new technology infrastructure through state appropriations, similar to other technology vendors.
2. **Expand HCBS Services:** Behavioral aide will continue to be offered through the State Plan and funded through state appropriations. Assistive Technology and telehealth service delivery for identified waiver services will be sustained through 1915(c) waiver authorities.
3. **Strengthen HCBS Services:** Georgia plans to sustain 1915(c) HCBS Services rate increases through appropriated state funds via 1915(c) waiver amendments or renewals, as applicable with updated rate methodologies. These rate increases will be sustained through state appropriated funds. Georgia plans to collaborate with certification agencies/authorities to develop training for immediate expansion of the direct care workforce. Once trainings have been provided, the state does not plan to continue funding workforce training beyond what is available through the certification agencies/authorities.
4. **Implement targeted evaluations and studies to support regulatory compliance, state of the art benefit design, and rate setting activities:** Georgia will conduct an outcome evaluation from the Supported Employment Pilot to adjust pilot activities as needed and use the data to inform long-term strategies for permanency.
5. **Planning List Support: Intensive Family Supports:** This project is a one-time initiative and thus will not continue long-term beyond March 2025. Georgia is implementing the Intensive Family Support initiative statewide to test the viability for statewideness post the ARPA HCBS allowance.

The total claimed for HCBS from April 1, 2021, through March 31, 2022 is \$2,035,153,380 which results in an additional \$203,515,338 earned. The state has spent an estimated \$40,099,267 of ARPA funding through Federal Fiscal Year 2023 Q3.

For detailed cost projections for each initiative, please refer to the attached *HCBS Spend Plan Through FFY23 Q1 Worksheet*. Please see below for details on initiatives and corresponding rows in the worksheet.



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Should you have additional questions or concerns, I may be reached at [REDACTED] or via email at [REDACTED].

Sincerely,

[REDACTED]

Lynnette R. Rhodes
Executive Director, Medical Assistance Plans



Quarterly Spending Plan Update

Currently, Georgia provides HCBS under the State plan as well as through 1915(c) waivers. Through consideration of the requests of internal and external stakeholders gathered during the months of June and July 2021, we have elected to make some targeted enhancements and expansions to HCBS. These expansions are designed to fill some of the identified gaps in care, increase availability of services, and improve existing services. Georgia indicated four strategic areas to invest the increased FMAP:

1) Enhancement and expansion of HCBS infrastructure

Georgia plans to maximize use of ARPA funds in two initiatives to enhance data and reporting.

INITIATIVE #1:	Develop a Case Management Technology Platform for Medicaid HCBS (Including State Plan and Waivers)
Description:	<p>Develop / procure an electronic platform to capture Medicaid HCBS case management activities for both state plan and waiver authorities. Funding would support implementation of the electronic platform, staff training on platform use, additional staff, and development of reporting and dashboard components that provide insight into trends and areas to target quality improvement activities.</p> <p>The technology platform would include incorporation of medical provider electronic health record (EHR) information to improve accuracy of care planning and service delivery.</p> <p><i>HCBS Spending Plan Worksheet reference: Row 10</i></p>
Fiscal:	Partner/Delegate Department(s): DCH
INITIATIVE #2:	Enhance the Critical Incident Management Process with Comprehensive Reporting and Dashboarding
Description:	<p>Enhance the current incident management process by developing standardized reporting templates and dashboards to further support the DCH efforts to identify trends and track performance. Funding would be used to:</p> <ul style="list-style-type: none"> Assess feasibility of efforts to update / replace / integrate existing critical incident management processes with a robust,



	<p>comprehensive data system and / or data warehouse that provides cross-population reporting capability to identify trends and track performance</p> <ul style="list-style-type: none"> • Develop requirements for update / replacement / integration of critical incident processes <p>Implement recommendations from assessment to enhance critical incident management processes</p> <p><i>HCBS Spending Plan Worksheet reference: Row 11</i></p>
Fiscal:	Partner/Delegate Department(s): DCH

2) Expand HCBS services

The State plans to use ARPA funds to expand existing HCBS services and develop new services as part of a long-term rebalancing strategy to shift long term services and supports towards HCBS.

INITIATIVE #1:	Expand HCBS Services to include Behavioral Aides for children and youth.
Description:	<p>Implement a new HCBS service that will provide Behavioral Aides in the home setting for members under age 21 who are diagnosed with serious emotional disturbance, autism spectrum disorder, traumatic brain injury and/or other developmental criteria with behavioral symptoms. Services will be rendered as a State Plan Service. Services must be accompanied by a physician's order.</p> <p>The addition of Behavioral Aides as a new service will reduce the number of admissions and/or readmission to Psychiatric Residential Treatment Facilities and increase access to HCBS services.</p> <p>Required Authority: State Plan Amendment</p> <p><i>HCBS Spending Plan Worksheet reference: Row 12</i></p>
Fiscal:	Partner/Delegate Department(s): DCH



INITIATIVE #2:	Expand the Use of Technology to deliver HCBS
Description:	<p>Incorporate telehealth visits as a permanent method for members to interact with health care professionals, case managers, and HCBS providers.</p> <p>Required Authority: 1915(c) Amendment</p> <p>Expand the use of assistive technology (AT) applications and devices to promote independence among HCBS recipients. Funds could be used to develop/deliver assessments that identify technology solutions most suitable for individuals as well as vendor matching activities to support delivery of AT from reliable vendors.</p> <p>Required Authority: 1915(c) Amendment</p> <p><i>HCBS Spending Plan Worksheet reference: Row 13</i></p>
Fiscal:	Partner/Delegate Department(s): DCH



3) Strengthen HCBS Services

The State plans to use ARPA funds to strengthen existing HCBS services by increasing rates, conducting a rate study for services provided in 1915(c) waivers, and engaging in workforce development and training.

INITIATIVE #1:	HCBS Provider Payment Rate Enhancements and Rate Study for 1915(c) Waivers.
Description:	<p>During the Public Health Emergency, Georgia experienced significant challenges in retaining a stable workforce and recruiting direct support professionals and home health workers. The impacts of COVID-19 were substantial, which resulted in a significant reduction in the direct care workforce.</p> <p>Providing increased reimbursement rates will support competitive recruitment, assist in building, retaining, and stabilizing the workforce, and reducing the existing workforce shortage. Enhanced reimbursement will encourage employees to remain with their agency or provider group which ensures access to critical HCBS services.</p> <p>Increased reimbursement rates and/or specialized payments will be provided for the following providers/services:</p> <ul style="list-style-type: none"> • Independent Care Waiver Program 1915(c) HCBS services (10% Rate Increase Implemented) Required Authority: 1915(c) Amendment <i>HCBS Spending Plan Worksheet reference: Row 14</i> • Elderly and Disabled Waiver Program 1915(c) HCBS services (10% Rate Increase Implemented) Required Authority: 1915(c) Renewal <i>HCBS Spending Plan Worksheet reference: Row 15</i>



	<ul style="list-style-type: none">• BH Temporary Payment Enhancements:<ul style="list-style-type: none">○ Behavioral Health agencies providing services under the Medicaid rehab option (Temporary Payment Enhancements) Required Authority: State Plan Amendment<p><i>HCBS Spending Plan Worksheet reference: Row 17</i></p>• IDD workforce 1915(c) HCBS services (Temporary Payment Enhancements)<p>(Georgia is projecting estimates for temporary payment enhancements) Required Authority: 1915(c) Amendment or Renewal, as applicable</p><p><i>HCBS Spending Plan Worksheet reference: Row 19</i></p>• Georgia Pediatric Program (skilled nursing services) (Planned 10% Increase beginning FFY Q4)<p><i>HCBS Spending Plan Worksheet reference: Row 20</i></p>• To further strengthen HCBS services, ARPA funds will be utilized to perform a rate study related to Georgia’s current 1915(c) waivers. The study aims to enhance the overall quality of HCBS 1915(c) waiver services and will include market research and a national scan.<p><i>HCBS Spending Plan Worksheet reference: Row 16 and 18</i></p>
Fiscal:	Partner/Delegate Department(s): DCH and DBHDD



INITIATIVE #2:	Workforce Development and Training
Description:	<p>During the Public Health Emergency, Georgia experienced significant challenges in retaining a stable workforce and recruiting Certified Nursing Assistants. The impacts of COVID-19 were substantial which resulted in a significant reduction in the direct care workforce.</p> <ul style="list-style-type: none"> • CNA Workforce Expansion: ARPA funding will be utilized to collaborate with Georgia’s Technical College System to strengthen the Certified Nursing Assistant (CNA) training program thereby expanding provider capacity. Certifying additional CNAs will reduce the workforce shortage which ensures that Georgia’s HCBS recipients will have access to services <i>(This initiative will be removed, and funding will be reallocated to separate initiatives)</i>. <i>HCBS Spending Plan Worksheet reference: Row 22</i> • Addressing Workforce Shortages for IDD Waiver Support Services: Short-term infusion of workforce analysis, development, and related recommendations <i>HCBS Spending Plan Worksheet reference: Row 21</i> • Funds to support the development of Transitional Age Young Adult services for the COMP/NOW 1915 (c) waivers: Provide service pilot development and training for providers who serve young adults with complex behavioral presentations between the age of 18 through 21. <i>HCBS Spending Plan Worksheet reference: Row 23</i> • For emerging provider type CCBHC, provide accreditation and certification cost reimbursement for specialized dual-diagnosis training and competency: Provide training to CCBHC providers on unique competencies for treating and supporting individuals with behavioral health conditions which meet the scope of Medicaid Rehab Option and have intellectual/developmental disabilities. <i>HCBS Spending Plan Worksheet reference: Row 24</i>
Fiscal:	Partner/Delegate Department(s): DCH and DBHDD



4) Implement targeted evaluations and studies to support regulatory compliance, state of the art benefit design, and rate setting activities

The State intends to assess the current status of the direct service workforce and develop initiatives to enhance the current workforce based on assessment results.

INITIATIVE #1	Assess Current State of HCBS Workforce Retention, Recruitment, and Development
Description:	Conduct an assessment of current HCBS workforce strengths and opportunities for improvement with a focus on direct service provider retention, recruitment, and career development. Additionally, funds may be used to implement select recommendations developed as part of the assessment process (<i>This initiative will be removed, and funding will be reallocated to separate initiatives</i>). <i>HCBS Spending Plan Worksheet reference: Row 25</i>
Fiscal:	Partner/Delegate Department(s): DCH
INITIATIVE #2	Supported Employment Pilot Program
Description:	Provide support to individuals on the planning list for supported employment to transition from school to Competitive Integrated Employment. <i>HCBS Spending Plan Worksheet reference: Row 26</i>
Fiscal:	Partner/Delegate Department(s): DBHDD

5) Addressing Social Determinants of Health and Health Disparities

The State plans to expand existing HCBS services by providing 100% state funds to planning list recipients who are not entitled to sustained service.

INITIATIVE #1	Intensive Family Supports
Description:	Provide temporary support to individuals on the planning list in the absence of available capacity in the IDD waivers. This project is a one-time initiative and thus will not continue long-term beyond March 2025. Georgia is implementing the Intensive Family Support initiative statewide to test the viability for statewideness post the ARPA HCBS allowance.



	<p>The supports offered under Intensive Family Support Services are classified within Appendix B as either Home Health Care, Personal Care Services or Case Management .</p> <ul style="list-style-type: none">• Nursing Services (RN and/or LPN)- Classified in Appendix B as Home Health Care (HHC)• Respite Services (in-home or out-of-home) Classified in Appendix B as HHC; Personal Care Services (PCS)• Direct Care Services (Community Living Support Services)- Classified in Appendix B as PCS• Case Management- Classified in Appendix B as Case Management• Specialized Medical Supplies- Classified in Appendix B as HHC• Specialized Medical Equipment- Classified in Appendix B as HHC• Transportation - Classified in Appendix B as PCS• Behavior Support – Classified in Appendix B as HHC; PCS• Parent/Family Training- Classified in Appendix B as HHC; PCS <p>These services will not be provided to individuals in institutions or nstitutional providers.</p> <p>There are 250 individuals who have been determined pre-eligible for a NOW or COMP waiver that would be eligible for the above-mentioned Intensive Family Supports. 100% of the identified 250 individuals have Medicaid or are eligible for Medicaid as determined during the annual review process for individuals on the planning list.</p> <p><i>HCBS Spending Plan Worksheet reference: Row 27</i></p>
Fiscal:	Partner/Delegate Department(s): DBHDD