

# Community Pathways Waiver

## Appendix J: Cost Neutrality Demonstration

### J-1: Composite Overview and Demonstration of Cost-Neutrality Formula

**Composite Overview.** Complete the fields in Cols. 3, 5 and 6 in the following table for each waiver year. The fields in Cols. 4, 7 and 8 are auto-calculated based on entries in Cols 3, 5, and 6. The fields in Col. 2 are auto-calculated using the Factor D data from the J-2-d Estimate of Factor D tables. Col. 2 fields will be populated ONLY when the Estimate of Factor D tables in J-2-d have been completed.

**Level(s) of Care:** ICF/IID

Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8
Year	Factor D	Factor D'	Total: D+D'	Factor G	Factor G'	Total: G+G'	Difference (Col 7 less Column4)
1	127520.16	14627.48	142147.64	304278.06	6572.50	310850.56	168702.92
2	143151.49	15139.44	158290.93	314927.79	6802.54	321730.33	163439.40
3	164,576.98 <del>148,789.94</del>	17,468.43 <del>15,669.32</del>	182,045.41 <del>164,459.26</del>	207,842.29 <del>325,950.26</del>	9,016.74 <del>7040.63</del>	216,859.03 <del>332,990.89</del>	34,813.62 <del>168,531.63</del>
4	169,535.04 <del>153,998.54</del>	17,992.49 <del>16,217.74</del>	187,527.53 <del>170,216.28</del>	214,077.56 <del>337,358.52</del>	9,287.24 <del>7,287.05</del>	223,364.80 <del>4,645.57</del>	35,837.27 <del>17,4429.29</del>
5	174,588.30 <del>159,284.00</del>	18,532.26 <del>16,785.36</del>	193,120.56 <del>17,6069.36</del>	220,499.89 <del>349,166.07</del>	9,565.86 <del>7,542.10</del>	230,065.75 <del>356,708.17</del>	36,945.19 <del>180,638.81</del>

## Appendix J: Cost Neutrality Demonstration

### J-2: Derivation of Estimates (1 of 9)

**a. Number Of Unduplicated Participants Served.** Enter the total number of unduplicated participants from Item B-3-a who will be served each year that the waiver is in operation. When the waiver serves individuals under more than one level of care, specify the number of unduplicated participants for each level of care:

Table: J-2-a: Unduplicated Participants

Waiver Year	Total Unduplicated Number of Participants (from Item B-3-a)	Distribution of Unduplicated Participants by Level of Care (if applicable)
Year 1	16,365	16,365
Year 2	16,498	16,498
Year 3	20,573 <del>16,623</del>	20,573 <del>16,623</del>
Year 4	20,710 <del>16,749</del>	20,710 <del>16,749</del>
Year 5	21,446 <del>16,875</del>	21,446 <del>16,875</del>

## Appendix J: Cost Neutrality Demonstration J-2:

### Derivation of Estimates (2 of 9)

**b. Average Length of Stay.** Describe the basis of the estimate of the average length of stay on the waiver by participants in item J-2-a.

The average length of stay for ~~all~~ waiver years 1-2 is 353 days. This is based on the average length of stay reported on the Center for Medicare and Medicaid Services 372(S) for the Community Pathways Waiver for fiscal years (FY) 2018-2019. The average length of stay for waiver years 3-5 was updated to 358 days based on the average length of stay reported on

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the Fiscal Year 2022 – 2023 Center for Medicare and Medicaid Services (CMS) 372(S) for the Community Pathways Waiver.

## Appendix J: Cost Neutrality Demonstration

### J-2: Derivation of Estimates (3 of 9)

c. Derivation of Estimates for Each Factor. Provide a narrative description for the derivation of the estimates of the following factors.

i. Factor D Derivation. The estimates of Factor D for each waiver year are located in Item J-2-d. The basis and methodology for these estimates is as follows:

The estimated number of users for Factor D estimates for Waiver Years ~~1-5~~ 1-2 are based on analysis of Center for Medicare and Medicaid Services-372(S) reports and user enrollment in Community Pathways Waiver services in Fiscal Year 22 Fiscal Year 23 ~~from~~ LTSS Maryland Person-Centered Plan data and Fiscal Year 22 ~~participants self-directed~~ ~~Self-Directed participant~~ service enrollment data. The Fiscal Year 22 - Fiscal Year 23 LTSS Maryland data file includes services on approved service plans for participants receiving services in ~~the~~ Provider Consumer Information System<sup>2</sup> and LTSS Maryland and for those who are self-directing their services. The Fiscal Year 22 Self-Directed service data file includes service user data only for participants self-directing their services. The estimated number of users for each service is based on the average of Fiscal Year 19 - Fiscal Year 20 Community Pathways Waiver Center for Medicare and Medicaid Services-372(s) ~~report~~ utilization or calculated using the basis of the percentage of users in each service to the total users in the Community Pathways Waiver program using data from the Fiscal Year 22-Fiscal Year 23 LTSS Maryland person-centered plan data file and the Fiscal Year 22 Self-Directed services data file for self-directed ~~specific~~ services. ~~Assuming the trend is was the same throughout the length of the waiver renewal (Fiscal Year 24-Fiscal Year 28), these percentages are were then applied to the Total Estimated Unduplicated Participants in Appendix B for each waiver year to get the estimated number of users for each service.~~

The percentages are as follows: Assistive Technology and Services – .5%; Behavioral Assessment and Behavioral Plan – 2.23%; Behavioral Consultation – 13.7%, Brief Support Implementation – 8.7%; Dedicated Hours for Supported Living 1:1 – 1.25%; Dedicated Hours for Supported Living 2:1 - .07%; Environmental Assessment - .04%; Environmental Modifications - .08%; Family Caregiver Training and Empowerment Services - .3%; Individual and Family Directed Goods and Services – 8.87% of estimated self-directed services users only; Individual and Family Directed Goods and Services Staff Recruitment and Advertising – 20% of estimated self-directed services users only; Live-In Caregiver Supports - .04%; Nursing Support Services – 7%; Participant Education, Training, and Advocacy Supports - .3%; Personal Supports – 31.63%; Personal Supports Enhanced Support – 4.92%; Remote Support Services - .03%; Respite Care Services Day – 3.31%; Respite Care Services Camp – 2.7%; Support Broker – 78.26% of estimated self-directed services users only; Supported Living – 2.59%; Transition Services - .35%; Transportation – 8.88%; and Vehicle Modifications - .03%.

As providers ~~continue~~ continued to transition their service billing from the Provider Consumer Information System<sup>2</sup> system to LTSS Maryland, we ~~estimate~~ estimated users of Provider Consumer Information System<sup>2</sup> services in Waiver Years 1-2 with all services estimated to be billed in LTSS Maryland in Waiver Years 3-5. ~~These estimates may be updated~~

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~~based on the LTSSMaryland transition plan and informed by the public health emergency unwinding timeline.~~ Some of the same services in both systems are billed using different units of service, so estimated users ~~have been~~ were included for both Provider Consumer Information System<sup>2</sup> and LTSSMaryland services. Provider Consumer Information System<sup>2</sup> hour unit services Family Peer and Mentoring Supports, Housing Support Services, and Respite Hourly are 15-minute unit services in LTSSMaryland and Provider Consumer Information System<sup>2</sup> Day unit services Community Development Services, Day Habilitation, and Career Exploration services are 15-minute unit services in LTSSMaryland.

We ~~estimate~~ ~~estimated~~ about half of the users remaining in Provider Consumer Information System<sup>2</sup> services, from a ~~an~~ Fiscal Year 22 Provider Consumer Information System<sup>2</sup> service data file, to transition to billing the LTSSMaryland service in Waiver Year1 with most of the remaining users transitioning in Waiver Year2 and all remaining users having transitioned by Waiver Year3. ~~Provider billing was fully transitioned from Provider Consumer Information System<sup>2</sup> to LTSSMaryland in the first quarter of Waiver Year 2.~~ The estimated number of users for each of these services ~~is was~~ based on the average of Fiscal Year 19 - Fiscal Year 20 Community Pathways Waiver Center for Medicare and Medicaid Services-372(S) ~~report~~ utilization for the services or calculated using the basis of the percentage of users in each service to the total users in the Community Pathways Waiver program using data from the Fiscal Year 22 - Fiscal Year 23 LTSSMaryland person-centered plan data file, and then applying the percentages to the Total Estimated Unduplicated Participants in Appendix B for each waiver year to get the estimated number of users for each service. For Waiver Years 1-2, the estimated remaining Provider Consumer Information System<sup>2</sup> service users are deducted from the estimated users for each LTSSMaryland service.

The percentages are as follows: Community Development Services (CDS) 1:1 – 13.8%, Community Development Services 2:1- .6%; Community Development Services Small Group – 18.6%; Community Living Enhanced Supports – .74%; Community Living Enhanced Supports Retainer Fee- 45% of estimated Community Living Enhanced Support users; Community Living Enhanced Supports Trial Experience - .01%; Community Living Group Home – 41.31%; Community Living Group Home Retainer Fee- 45% of estimated Community Living Group Home users; Community Living Group Home Trial Experience - .01%; Day Habilitation 1:1 – 12.95%; Day Hab. 2:1 - .37%; Day Hab. Small Group – 20.35%; Day Hab. Large Group – 20.35%; Dedicated Hours Community Living Enhanced Supports 1:1- .45%; Dedicated Hours Community Living Enhanced Supports 2:1- .08%; Dedicated Hours for Community Living Group Home 1:1- 25.25%; Dedicated Hours for Community Living Group Home 2:1 – 1.25%; Employment Services- Discovery 1, Discovery 2, and Discovery 3 – 1.59%; Follow Along Supports – 13.8%; Job Development – 7.93%; On-going Job Supports – 13.4%; Co-Worker Employment Supports - .01%; Customized Self-Employment Services - .03%.; Family and Peer Mentoring Supports - .2%; Housing Support Services - .6%; Respite Services – 9%; Shared Living Level 1 - .26%; Shared Living Level 2 - .93%; Shared Living Level 3 - .32%; Career Exploration Facility - .82%, Large Group - .33%; and Small Group – 2.27%.

The users for Provider Consumer Information System<sup>2</sup> services Supported Employment and Employment Discovery and Customization ~~are were~~ estimated to transition to Employment Services in LTSSMaryland in Waiver Years 1-2 based on the remaining users in the Fiscal Year22 Provider Consumer Information System<sup>2</sup> service data file. No users are estimated for these services in Waiver Years 3-5.

The users for Medical Day Care ~~are were~~ estimated at 5.5% of estimated unduplicated participants for ~~each~~ waiver year

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years 1-2 based on the average of Fiscal Year 19 - Fiscal Year 20 Community Pathways Waiver Center for Medicare and Medicaid Services-372(S) report utilization and are estimated at 3.2% of estimated unduplicated participants for waiver years 3-5 based on the average of Fiscal Year 22 - Fiscal Year 23 Community Pathways Waiver Center for Medicare and Medicaid Services-372(S) report utilization.

In Waiver Year 3, DDA will merge participants from three approved Waiver programs into one Waiver program. Participants enrolled in the Community Support Waiver and Family Support Waiver will be combined with participants in the Community Pathways Waiver, therefore the estimated number of users for Factor D estimates for waiver years 3-5 have been updated. The State has elected to use Fiscal Year 25-26 LTSS Maryland Person-Centered Plan data and Fiscal Year 24-25 actual paid claims data to project Factor D estimates instead of the Center for Medicare and Medicaid Services 372(S) report as the report does not reflect the merged Waiver programs and the completed billing system transition. The state's claims and budget data capture the recent changes to the Waiver program and thus serve as a more accurate resource to base the state's estimates. The estimated number of users for all services except Assistive Technology Monthly Service Fee and Day-to-Day Administrative Support, are calculated based on the percentage of users enrolled in traditional and self-directed services in all three Waiver programs to the total number of Waiver users. Assuming the trend remains the same for Waiver Years 3-5, these percentages are then applied to the Total Estimated Unduplicated Participants in Appendix B to get the estimated number of users for each service.

The percentages are as follows: Assistive Technology and Services – 1.4%; Behavioral Assessment and Behavioral Plan – 3.2%; Behavioral Consultation – 20.1%, Brief Support Implementation – 12%; Career Exploration Facility - .32%, Large Group - .06%; and Small Group – .9%; Community Development Services (CDS) 1:1 – 19.7%, Community Development Services 2:1 - 1.3%; Community Development Services Small Group – 29.6%; Community Living Enhanced Supports - .3%; Community Living Enhanced Supports Retainer Fee- 30% of estimated Community Living Enhanced Support users; Community Living Enhanced Supports Trial Experience - .02%; Community Living Group Home – 35%; Community Living Group Home Retainer Fee- 33% of estimated Community Living Group Home users; Community Living Group Home Trial Experience - .02%; Day Habilitation 1:1 – 9%; Day Hab. 2:1 - .3%; Day Hab. Small Group – 20.7%; Day Hab. Large Group – 8.9%; Dedicated Hours Community Living Enhanced Supports 1:1- .27%; Dedicated Hours Community Living Enhanced Supports 2:1- .03%; Dedicated Hours for Community Living Group Home 1:1- 19.23%; Dedicated Hours for Community Living Group Home 2:1 – 1.25%; Dedicated Hours for Supported Living 1:1 – .8%; Dedicated Hours for Supported Living 2:1 - .06%; Employment Services- Discovery 1, Discovery 2, and Discovery 3 – 1%; Follow Along Supports – 12.4%; Job Development – 5.6%; On-going Job Supports – 9.3%; Co-Worker Employment Supports - .02%; Customized Self-Employment Services - .02%. Environmental Assessment - .7%; Environmental Modifications - .4%; Family and Peer Mentoring Supports - .2%; Family Caregiver Training and Empowerment Services - .04%; Housing Support Services – 2.8%; Individual and Family Directed Goods and Services – 6.9%; Individual and Family Directed Goods and Services Staff Recruitment and Advertising – 1.1%; Live-In Caregiver Supports - .04%; Nursing Support Services – 6.6%; Participant Education, Training, and Advocacy Supports - .02%; Personal Supports – 35%; Personal Supports Enhanced Support – 4.7%; Personal Supports 2:1- .14%; Remote Support Services - .04%; Respite Care Services Day – .6%; Respite Services – 9.73%; Respite Care Services Camp – 1.2%; Shared Living Level 1 - .1%; Shared Living Level 2 - .6%; Shared Living Level 3 - .22%; Support Broker – 16.8%; Supported Living – 2.65%; Transition Services - .06%; Transportation – 8.4%; and Vehicle Modifications - .08%.

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In Waiver Year 3, the Assistive Technology Monthly Service Fee and Day-to-Day Administrative Support are included in the Waiver. Due to a lack of prior utilization data, the estimated number of users for these services in Waiver Years 3-5 was determined as follows: for the Assistive Technology Monthly Services Fee, 5% of the estimated users of Assistive Technology services, and for the Day-to-Day Administrator, 75% of the estimated users self-directing their services which is based on Support Broker service utilization.

The Average Units per User for Waiver Years ~~1-5~~ 1-2 are based on historical utilization of services in the Community Pathways Waiver Center for Medicare and Medicaid Services 372(S) ~~report~~ data Fiscal Year 18-20 and Fiscal Year 21 average actual utilization of Community Pathways Waiver services billed in Provider Consumer Information System<sup>2</sup>, or allowable unit limits set in the Waiver for all services except: Employment Services Job Development and On-going Job Supports that were estimated by calculating the average units per user of Community Pathways Waiver participants enrolled in these services in the Fiscal Year 22 - Fiscal Year 23 LTSSMaryland budget data file, for Personal Supports, Personal Supports Enhanced, Supported Living, Dedicated Hours for Supported Living 1:1, and Dedicated Hours for Supported Living for 2:1 that were estimated using actual Fiscal Year 22 LTSSMaryland service expenditures. Additionally, average units per user for Waiver Years ~~1-5~~ 1-2 for Dedicated Hours for Community Living Enhanced Support and Community Living Group Home were estimated based on budgets in the Fiscal Year 22- 23 LTSSMaryland budget data file.

In Waiver Years ~~1-5~~ 1-2, the estimated units per user for Community Development Services, Day Habilitation, and Career Exploration Services in LTSSMaryland reflect the unit change from a Day to a 15-minute unit and the removal of the limitation of receiving only one Day service per day. For these services, the units per user estimates are based on an average of three hours a day, which was calculated by dividing the budget amounts by users and the rate in the Fiscal Year 22 - Fiscal Year 23 LTSSMaryland budget file. The three-hour average multiplied by the average actual Days billed in Fiscal Year 21 in Provider Consumer Information System<sup>2</sup> are the estimated units per user for these services.

In Waiver Years, 3-5, the estimated average units per user are based on actual service utilization of Waiver services from Fiscal Year 24 - Fiscal Year 25 paid claims data or allowable unit limits set in the Waiver for all services except Medical Day Care where the average units per user are based on the average units from the Fiscal Year 22-23 Community Pathways Waiver Center for Medicare and Medicaid Services 372(S) reports. The state's claims data captures the recent changes to the Waiver program and thus serves as a more accurate resource to base the state's estimates. In Waiver Years 3-5, Support Broker services units are updated to reflect a unit change from an Item to a 15-minute unit.

The Average Cost per Unit ~~for waiver years 1-2 per waiver year~~ for LTSSMaryland rate-based services is based on the Department's approved Fiscal Year 23 LTSSMaryland standard rates found on DDA's website here: <https://health.maryland.gov/dda/Pages/rates.aspx#ffs> ~~https://health.maryland.gov/dda/Pages/LTSS-Rates.aspx~~ and trended forward using the average inflation rate of 3.5 percent from the 2019-2021 Bureau of Labor Statistics Consumer Price Index for All Urban Consumers (CPI-U) for Medical Care for the Washington – Baltimore region. See Appendix I for detailed rate methodologies for each service and a detailed rate file is available upon request. The LTSSMaryland rate-based services include: all Behavioral Support Services, all Community Development Services (15-minute unit), all Community Living Enhanced Supports services; all Community Living Group Home services, all Dedicated Hours

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services, all Day Habilitation Services (15-minute unit), Employment Services Discovery 1,2, and 3, Follow Along Supports, Job Development, On-going Job Supports, and Customized Self-Employment, Family and Peer Mentoring Supports (15-minute unit), Housing Support Services (15-minute unit), Nursing Support Services, Personal Support services, Respite Care Services Day and Respite, all levels of Shared Living, Supported Living, and all Career Exploration services (15-minute unit). In waiver year 3, the average cost per unit was estimated for each service using Fiscal Year 24 - 25 paid claims data and Fiscal Year 24 - 25 LTSSMaryland budget files and adding a proposed 1% cost of living increase then trending the estimates forward in waiver years 4-5 using the average inflation rate of medical care from December 2023-2024 Bureau of Labor Statistics Consumer Price Index for All Urban Consumers (CPI-U) in the Baltimore-Columbia-Towson, Maryland region of 3.1 percent rounded to 3 percent. The state's claims data captures the recent changes to the Waiver program and thus serves as a more accurate resource to base the state's estimates.

Additionally, a geographically differentiated rate, or premium rate, was adopted for rates in LTSSMaryland as of January 19, 2021. Payment of the premium rate will be based on the person's residence in Frederick, Montgomery, Prince George's, Calvert, or Charles Counties and is applicable to all Waiver service rates in LTSSMaryland, except Market Rate services, Medical Day Care, all Behavioral Support Services, Environmental Assessment, Shared Living 1, 2, and 3, and Family Peer and Mentoring Supports. The average cost per unit for services was based on standard rates only for Waiver Years ~~1-5~~ 1-2 in absence of historical utilization information in the Center for Medicare and Medicaid Services-372(S) report. In waiver year 3, for the rate-based services without a premium rate, the average cost per unit was estimated as the Department's approved Fiscal Year25 LTSSMaryland standard rates found on DDA's website here: <https://health.maryland.gov/dda/Pages/rates.aspx#ffs> rate plus a proposed 1% cost of living increase then trending the estimates forward in waiver years 4-5 using the average inflation rate of medical care from December 2023-2024 Bureau of Labor Statistics Consumer Price Index for All Urban Consumers (CPI-U) in the Baltimore-Columbia-Towson, MD region of 3.1 percent rounded to 3 percent.

The Average Cost per Unit ~~per waiver year~~ for waiver years 1-2 for Provider Consumer Information System2 Fee-Payment System (FPS) services are based on averages from the Community Pathways Waiver Center for Medicare and Medicaid Services 372(S) Fiscal Year 18-20 and/or Fiscal Year21 average costs for actual billed services in Provider Consumer Information System2 trended forward using the approved American Rescue Plan Act (ARPA) rate increase of 5.5 percent in Fiscal Year 22 and the approved Cost of Living adjustment of 8% in Fiscal Year 23, and then trending forward in Waiver Years 1-5 using the average inflation rate of 3.5 percent from the 2019-2021 Bureau of Labor Statistics Consumer Price Index for All Urban Consumers (CPI-U) for Medical Care for the Washington – Baltimore region. The Provider Consumer Information System FPS services include Day unit services Community Development Services, Community Living Group Home services, Day Habilitation, Career Exploration, Employment Discovery and Customization, Shared Living, and Supported Employment.

The average Cost per Units per waiver year for Provider Consumer Information System2 non-FPS services in waiver years 1-2 are based on rates from the previous rate study done by Johnston, Villegas-Grubbs and Associates, LLC in 2017 and then subsequently reviewed and validated by another vendor, Optumas. These rates were adopted for services authorized in Provider Consumer Information System2 including, all Behavioral Support Services, Family and Peer Mentoring Supports (Hour), Housing Support Services (Hour), and Respite Care Services Hour, Environmental Assessment and Nursing Support Services. These rates were trended forward by approved Fiscal Year cost of living

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increases as well as the American Rescue Plan Act (ARPA) rate increase and for Waiver Years ~~1-5~~ 1-2 using the average inflation rate of 3.5 percent from the 2019-2021 Bureau of Labor Statistics Consumer Price Index for All Urban Consumers (CPI-U) for Medical Care for the Washington – Baltimore region.

For Assistive Technology and Services, Environmental Modifications, Family Caregiver Training and Empowerment Services, Individual and Family Directed Goods and Services, Live-In Caregiver Supports, Participant Education, Training, and Advocacy Supports, Respite Camp, Support Broker, Transition services, Transportation and Vehicle Modifications services, the average cost per unit per Waiver Years ~~1-5~~ 1-2 based on averages from the Community Pathways Waiver Center for Medicare and Medicaid Services 372(S) report Fiscal Years 18-20. In waiver years 3-5, the average cost per unit is based on the average cost per user from Fiscal Year 24-25 paid claims data. The state's claims data captures the recent changes to the Waiver program and thus serves as a more accurate resource to base the state's estimates. For Waiver Years 3-5, the average monthly cost per unit for Assistive Technology Monthly Service Fees is determined by market research, as there is no historical Waiver program cost data available and Day-to-Day Administrative Support average cost per unit is based on Fiscal Year 24-25 paid claims data for Support Brokers.

In waiver years 1-2, ~~The the~~ average cost per unit for Employment Services Co-Worker and Remote Support Services were based on the average budgets in the Fiscal Year 22 - Fiscal Year 23 LTSS Maryland budget data file in absence of historical data in the Community Pathways Waiver Center for Medicare and Medicaid Services-372(S). In waiver years 3-5, the average cost per unit was based on the average cost per user from Fiscal Year 24-25 paid claims data.

In waiver years 1-2, ~~The the~~ average cost per unit per waiver year for Medical Day Care was based on the approved rate for Fiscal Year 23 (Waiver Year 1) and trended forward in Waiver Years 2-5 using the average inflation rate of 3.5 percent from the 2019-2021 Bureau of Labor Statistics Consumer Price Index for All Urban Consumers (CPI-U) for Medical Care for the Washington – Baltimore region. In waiver year 3, the average cost per unit was updated to the actual Fiscal Year 25 rate plus a proposed 1% cost of living increase then trended forward in waiver years 4-5 using the average inflation rate of medical care from December 2023-2024 Bureau of Labor Statistics Consumer Price Index for All Urban Consumers (CPI-U) in the Baltimore-Columbia-Towson, MD region of 3.1 percent rounded to 3 percent.

*ii. Factor D' Derivation. The estimates of Factor D' for each waiver year are included in Item J-1. The basis of these estimates is as follows:*

Factor D' was calculated for Waiver Years ~~1-5~~ 1-2 based on the actual amount in the Fiscal Year 2020 Center for Medicare and Medicaid Services-372(S) report for the Community Pathways Waiver and trended forward using the average inflation rate of 3.5 percent from the 2019-2021 Bureau of Labor Statistics Consumer Price Index for All Urban Consumers (CPI-U) for Medical Care for Washington-Baltimore. For waiver year 3, Factor D' was based on the actual amount in the Fiscal Year 2023 Community Pathways Waiver Center for Medicare and Medicaid Services-372(S) report and trended forward using the average inflation rate of medical care from December 2023-2024 Bureau of Labor Statistics Consumer Price Index for All Urban Consumers (CPI-U) in the Baltimore-Columbia-Towson, MD region of 3.1 percent rounded to 3 percent. This data removes the cost of prescribed drugs under the provisions of part D.

*iii. Factor G Derivation. The estimates of Factor G for each waiver year are included in Item J-1. The basis of these estimates is as follows:*

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The estimated annual average institutional costs that would be incurred for individuals served in the Waiver, were the waiver not granted, are based on actual data from the Community Pathways Waiver Center for Medicare and Medicaid Services 372(S) Fiscal Year 2020 report. The 3.5 percent inflation rate applied to Factor G for ~~all~~ Waiver Years 1-2 is based on 2019-2021 Bureau of Labor Statistics Consumer Price Index for All Urban Consumers (CPI-U) for Medical Care for Washington – Baltimore. For waiver year 3, Factor G was updated using more recent data analyzed by the Hilltop Institute. Using MMIS2 claims data, Hilltop identified Intermediate Care Facilities for Individuals with Intellectual Disabilities providers and pulled unduplicated residents, total days of care, average length of stay (ALOS), and total Medicaid institutional expenditures with the stay span. Hilltop analyzed the institutional costs using several methods and DDA opted to base Factor G on the Fiscal Year 24 annualized average institutional costs based on MMIS per member per day rate multiplied by the 358 average length of stay for the Community Pathways Waiver and trended forward in waiver years 4-5 using the average inflation rate of medical care from December 2023-2024 Bureau of Labor Statistics Consumer Price Index for All Urban Consumers (CPI-U) in the Baltimore-Columbia-Towson, MD region of 3.1 percent rounded to 3 percent.

*iv. Factor G' Derivation. The estimates of Factor G' for each waiver year are included in Item J-1. The basis of these estimates is as follows:*

The estimated annual average per capita Medicaid costs for all other services other than those included in factor G for individuals served in the Waiver, were the waiver not granted, are based on actual data from the Community Pathways Waiver Center for Medicare and Medicaid Services 372(S) Fiscal Year 2020 report. The 3.5 percent inflation rate applied to Factor G' for ~~all~~ Waiver Years 1-2 is based on ~~2019~~ 2019 - 2021 Bureau of Labor Statistics Consumer Price Index for All Urban Consumers (CPI-U) for Medical Care for Washington – Baltimore. For waiver year 3, Factor G' was updated using more recent data analyzed by Hilltop Institute. Using participants identified for Factor G with an Intermediate Care Facilities for Individuals with Intellectual Disabilities stay, Hilltop pulled total Medicaid non-institutional expenditures within the Intermediate Care Facilities for Individuals with Intellectual Disabilities stay for the cohort. Hilltop annualized the average Medicaid non-Intermediate Care Facilities for Individuals with Intellectual Disabilities costs incurred during an Intermediate Care Facilities for Individuals with Intellectual Disabilities stay by multiplying the cost per member per day by 365 days. DDA used the Fiscal Year 24 cost per member per day and annualized the costs based on the 358 average length of stay for the Community Pathways Waiver and trended forward in waiver years 4-5 using the average inflation rate of medical care from December 2023-2024 Bureau of Labor Statistics Consumer Price Index for All Urban Consumers (CPI-U) in the Baltimore-Columbia-Towson, Maryland region of 3.1 percent rounded to 3 percent.

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### Derivation of Estimates (4 of 9)

**Component management for waiver services.** If the service(s) below includes two or more discrete services that are reimbursed separately, or is a bundled service, each component of the service must be listed. Select “manage components” to add these components.

Waver Services	
Assistive Technology and Services	Assistive Technology and Services, Monthly Service Fee
Behavioral Support Services	Assessment, Plan, Consultation, Brief Support Implementation

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Career Exploration	LTSS Large Group, LTSS Small Group, LTSS Facility, Provider Consumer Information System Large Group, Provider Consumer Information System Small Group, Provider Consumer Information System Facility
Community Development Services	LTSS – Community Development Services Small Group, LTSS – Community Development Services 1:1, LTSS – Community Development Services 2:1, Provider Consumer Information System – Community Development Services
Community Living – Enhanced Supports	Trial Experience, Retainer Fee, Service, Dedicated Supports 1:1, Dedicated Supports 2:1,
Community Living – Group Home	LTSS – Trial Experience, LTSS – Retainer Fee, LTSS Service, LTSS Dedicated Supports 1:1, LTSS Dedicated Supports 2:1, Provider Consumer Information System – Trial Experience, Provider Consumer Information System – Retainer Fee, Provider Consumer Information System Service,
Day Habilitation	Day Habilitation Small Group 2-5, Day Habilitation Large Group 6-10, Day Habilitation 1:1, Day Habilitation 2:1, Provider Consumer Information System Day Habilitation
Employment Discovery & Customization	
Employment Services	Discovery Milestone 1, Discovery Milestone 2, Discovery Milestone 3, Follow Along Supports, Job Development, On-going Job Supports, Co-Worker Employment Supports, Self-Employment Development Services
Environmental Assessments	
Environmental Modifications	
Family Caregiver Training and Empowerment Services	
Family and Peer Mentoring Supports	Family and Peer Mentoring Supports, Family and Peer Mentoring Supports (Provider Consumer Information System)
Housing Support Services	Housing Support Services, Housing Support Services (Provider Consumer Information System)
Individual and Family Goods and Services	Goods and Services, Staff Recruitment and Advertising, <b>Day to Day Administrative Support</b>
Live-in Caregiver Supports	
Medical Day Care	
Nursing Support Services	Nursing Support Services
Participant Education, Training, and Advocacy Supports	
Personal Supports	Personal Supports, Personal Supports Enhanced Supports
Remote Support Services	
Respite Care Services	Daily, 15-Minute, Camp, Respite, Provider Consumer Information System – Respite Care Services Hourly
Shared Living	Shared Living Level 1, Shared Living Level 2, Shared Living Level 3, Shared Living (Provider Consumer Information

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	System)
Supported Employment	
Supported Living	Supported Living, Dedicated Supports Supported Living 1:1, Dedicated Supports Supported Living 2:1
Support Broker Services	
Transition Services	
Transportation	
Vehicle Modifications	

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### Derivation of Estimates (5 of 7)

#### d. Estimate of Factor D.

<b>X</b>	<b>The waiver does not operate concurrently with a §1915(b) waiver. Complete Item J-2-d-i</b>
	<b>The waiver operates concurrently with a §1915(b) waiver. Complete Item J-2-d-ii</b>

**i. Non-Concurrent Waiver.** Complete the following table for each waiver year. Enter data into the Unit, # Users, Avg. Units Per User, and Avg. Cost/Unit fields for all the Waiver Service/Component items. Select Save and Calculate to automatically calculate and populate the Component Costs and Total Costs fields. All fields in this table must be completed in order to populate the Factor D fields in the J-1 Composite Overview table.

#### Waiver Year: Year 1

Waiver Component	Unit	# Users	Avg. Units per User	Avg. Cost per Unit	Total Cost
Assistive Technology and Services	Item	82	1	\$984.00	\$80,688.00
<b>Behavioral Support Services:</b>					\$6,228,016.42
Assessment	Assessment	365	1	\$1,558.33	\$568,790.45
Consultation	15 minutes	2242	48	\$35.45	\$3,814,987.20
Plan	Plan	365	1	\$1,558.33	\$568,790.45
Brief Supports Implementation Services	15 minutes	1424	48	\$18.66	\$1,275,448.32
Community Development Services Provider Consumer Information System	Day	718	147	\$156.86	\$16,555,945.56
Community Development Services LTSS					\$86,306,522.40
1:1	15 minutes	1754	1764	\$14.24	\$44,059,357.44
2:1	15 minutes	65	1764	\$28.48	\$3,265,516.80
Small Group	15 minutes	2366	1764	\$9.34	\$38,981,648.16
Community Living-Group Home Provider Consumer Information System:	Day				\$311,569,309.98

# Community Pathways Waiver

<i>Service</i>	Day	1931	353	\$449.63	\$306,487,142.09
<i>Retainer Fee</i>	Day	869	13	\$449.63	\$5,079,470.11
<i>Trial Experience</i>	Day	2	3	\$449.63	\$2,697.78
<b>Community Living-Enhanced Supports:</b>					\$23,336,910.13
<i>Service</i>	Day	64	353	\$694.07	\$15,680,429.44
<i>Retainer Fee</i>	Day	29	13	\$694.07	\$261,664.39
<i>Trial Experience</i>	Day	2	3	\$631.17	\$3,787.02
<i>Dedicated Supports Community Living Enhanced Supports 1:1</i>	15 minutes	46	11296	\$11.48	\$5,965,191.68
<i>Dedicated Supports Community Living Enhanced Supports 2:1</i>	15 minutes	11	5648	\$22.95	\$1,425,837.60
<b>Community Living-Group Home LTSS:</b>					\$1,056,642,406.20
<i>Service</i>	Day	4808	353	\$420.52	\$713,716,636.48
<i>Retainer Fee</i>	Day	2164	13	\$420.52	\$11,830,068.64
<i>Trial Experience</i>	Day	2	3	\$338.98	\$2,033.88
<i>Dedicated Supports Community Living Group Home 1:1</i>	15 minutes	2717	11296	\$10.31	\$316,426,601.92
<i>Dedicated Supports Community Living Group Home 2:1</i>	15 minutes	126	5648	\$20.61	\$14,667,065.28
<b>Day Habilitation Provider Consumer Information System2</b>	Day	2683	163	\$146.08	\$63,885,020.32
<b>Day Habilitation:</b>					\$63,991,889.64
<i>Day Habilitation 1:1</i>	15 minutes	1127	1956	\$14.56	\$32,096,238.72
<i>Day Habilitation 2:1</i>	15 minutes	31	1956	\$29.14	\$1,766,933.04
<i>Day Habilitation Small Group 2-5</i>	15 minutes	1923	1956	\$4.99	\$18,769,326.12
<i>Day Habilitation Large Group 6-10</i>	15 minutes	1923	1956	\$3.02	\$11,359,391.76
<b>Employment Discovery &amp; Customization</b>	Day	6	41	\$132.98	\$32,713.08
<b>Employment Services:</b>					\$79,932,952.29
<i>Discovery Milestone 1</i>	Milestone	220	1	\$685.67	\$150,847.40
<i>Discovery Milestone 2</i>	Milestone	220	1	\$2,057.00	\$452,540.00
<i>Discovery Milestone 3</i>	Milestone	220	1	\$1,371.33	\$301,692.60
<i>Follow Along Supports</i>	Month	1783	6	\$630.52	\$6,745,302.96
<i>Job Development</i>	15 minutes	975	598	\$21.42	\$12,488,931.00
<i>On-going Job Supports</i>	15 minutes	1652	2179	\$16.61	\$59,791,149.88
<i>Co-Worker Employment Supports</i>	Item	1	2	\$500.00	\$1,000.00
<i>Customized Self-Employment Services</i>	Milestone	3	1	\$496.15	\$1,488.45
Environmental Assessments	Assessment	6	1	\$475.89	\$2,855.34
Environmental Modification	Item	13	1	\$7,601.00	\$98,813.00
Family and Peer Mentoring Supports	15 minutes	31	20	\$14.84	\$9,200.80
Family and Peer Mentoring Supports Provider Consumer Information System	Hour	1	5	\$67.66	\$338.30
Family Caregiver Training and Empowerment Services	Item	50	1	\$500.00	\$25,000.00

# Community Pathways Waiver

Housing Supports Services	15 minutes	93	40	\$16.62	\$61,826.40
Housing Supports Services Provider Consumer Information System	Hour	5	10	\$70.15	\$3,507.50
<b>Individual and Family Directed Goods and Services:</b>					\$353,720.00
<i>Goods and Services</i>	Item	173	4	\$385.00	\$266,420.00
<i>Staff Recruitment and Advertising</i>	Item	388	1	\$225.00	\$87,300.00
Live-In Caregiver Supports	Item	6	12	\$220.00	\$15,840.00
Medical Day Care	Day	900	147	\$101.07	\$13,371,561.00
Nursing Support Services	15 minutes	1146	60	\$25.21	\$1,733,439.60
Participant Education, Training, and Advocacy Supports	Item	50	1	\$500.00	\$25,000.00
<b>Personal Supports:</b>					\$232,817,033.60
<i>Personal Supports</i>	15 minutes	5176	3460	\$10.86	\$194,491,305.60
<i>Personal Supports Enhanced Supports</i>	15 minutes	805	3460	\$13.76	\$38,325,728.00
<i>Personal Supports 2:1</i>	15 minutes				
Remote Support Services	Item	5	12	\$1,200.00	\$72,000.00
<b>Respite Hour Provider Consumer Information System</b>	Hour	105	350	\$33.47	\$1,230,022.50
<b>Respite Care Services:</b>					\$18,587,538.60
<i>Daily</i>	Day	542	10	\$442.33	\$2,397,428.60
<i>Respite</i>	15 minutes	1370	1400	\$7.88	\$15,113,840.00
<i>Camp</i>	Item	442	1	\$2,435.00	\$1,076,270.00
<b>Shared Living Provider Consumer Information System</b>	Month	103	12	\$3,823.00	\$4,725,228.00
<b>Shared Living:</b>					\$7,809,812.76
<i>Shared Living Level 1</i>	Month	27	12	\$4,046.20	\$1,310,968.80
<i>Shared Living Level 2</i>	Month	82	12	\$4,644.53	\$4,570,217.52
<i>Shared Living Level 3</i>	Month	29	12	\$5,542.03	\$1,928,626.44
Support Broker Services	Item	1517	12	\$467.00	\$8,501,268.00
<b>Supported Employment Provider Consumer Information System</b>	Day	671	152	\$122.51	\$12,495,039.92
<b>Supported Living:</b>					\$72,167,544.99
<i>Supported Living</i>	Day	424	353	\$395.42	\$59,183,302.24
<i>Dedicated Supports Supported Living 1:1</i>	15 minutes	205	5725	\$10.31	\$12,100,073.75
<i>Dedicated Supports Supported Living 2:1</i>	15 minutes	11	3900	\$20.61	\$884,169.00
Transition Services	Item	57	1	\$2,010.00	\$114,570.00
<b>Career Exploration Provider Consumer Information System</b>	Day				\$270,205.76
<i>Facility</i>	Day	20	88	\$105.88	\$186,348.80
<i>Large Group</i>	Day	6	88	\$105.88	\$55,904.64
<i>Small Group</i>	Day	23	88	\$105.88	\$214,301.12
<b>Career Exploration: LTSS</b>					\$1,390,688.64
<i>Facility</i>	15 minutes	114	1056	\$3.81	\$458,663.04
<i>Large Group</i>	15 minutes	48	1056	\$2.57	\$130,268.16

# Community Pathways Waiver

<i>Small Group</i>	15 minutes	349	1056	\$3.42	\$1,260,420.48
Transportation	Item	1453	12	\$100.00	\$1,743,600.00
Vehicle Modification	Item	5	1	\$6,875.00	\$34,375.00
GRAND TOTAL:					\$2,086,867,415.57
TOTAL ESTIMATED UNDUPLICATED PARTICIPANTS (from Table J-2-a)					16,365
FACTOR D (Divide grand total by number of participants)					\$127,520.16
AVERAGE LENGTH OF STAY ON THE WAIVER					353

## Appendix J: Cost Neutrality Demonstration

### J-2: Derivation of Estimates (6 of 9)

#### d. Estimate of Factor D.

**i. Non-Concurrent Waiver.** Complete the following table for each waiver year. Enter data into the Unit, # Users, Avg. Units Per User, and Avg. Cost/Unit fields for all the Waiver Service/Component items. Select Save and Calculate to automatically calculate and populate the Component Costs and Total Costs fields. All fields in this table must be completed in order to populate the Factor D fields in the J-1 Composite Overview table.

#### Waiver Year: Year 2

Waiver Component	Unit	#Users	Avg. Units per User	Avg. Cost per Unit	Total Cost
Assistive Technology and Services	Item	82	1	\$984.00	\$80,688.00
<b>Behavioral Support Services:</b>					\$6,497,276.32
<i>Assessment</i>	Assessment	368	1	\$1,612.87	\$593,536.16
<i>Consultation</i>	15 minutes	2260	48	\$36.69	\$3,980,131.20
<i>Plan</i>	Plan	368	1	\$1,612.87	\$593,536.16
<i>Brief Supports Implementation Services</i>	15 minutes	1435	48	\$19.31	\$1,330,072.80
<b>Community Development Services Provider Consumer Information System</b>	Day	18	147	\$162.35	\$429,578.10
<b>Community Development Services LTSS</b>					\$116,006,937.48
<i>1:1</i>	15 minutes	2264	1764	\$14.74	\$58,867,079.04
<i>2:1</i>	15 minutes	98	1764	\$29.48	\$5,096,266.56
<i>Small Group</i>	15 minutes	3051	1764	\$9.67	\$52,043,591.88
<b>Community Living-Group Home Provider Consumer Information System:</b>	Day				\$13,526,619.12
<i>Service</i>	Day	81	353	\$465.36	\$13,306,038.48
<i>Retainer Fee</i>	Day	36	13	\$465.36	\$217,788.48
<i>Trial Experience</i>	Day	2	3	\$465.36	\$2,792.16
<b>Community Living-Enhanced Supports:</b>					\$41,063,185.48

# Community Pathways Waiver

<i>Service</i>	Day	114	353	\$718.36	\$28,908,243.12
<i>Retainer Fee</i>	Day	51	13	\$718.36	\$476,272.68
<i>Trial Experience</i>	Day	2	3	\$718.36	\$4,310.16
<i>Dedicated Supports Community Living Enhanced Supports 1:1</i>	15 minutes	74	11296	\$11.88	\$9,930,539.52
<i>Dedicated Supports Community Living Enhanced Supports 2:1</i>	15 minutes	13	5648	\$23.75	\$1,743,820.00
<b>Community Living-Group Home LTSS:</b>					\$1,569,713,502.96
<i>Service</i>	Day	6695	353	\$435.24	\$1,028,617,925.40
<i>Retainer Fee</i>	Day	3013	13	\$435.24	\$17,047,915.56
<i>Trial Experience</i>	Day	2	3	\$350.84	\$2,105.04
<i>Dedicated Supports Community Living Group Home 1:1</i>	15 minutes	4143	11296	\$10.67	\$499,348,829.76
<i>Dedicated Supports Community Living Group Home 2:1</i>	15 minutes	205	5648	\$21.33	\$24,696,727.20
<b>Day Habilitation Provider Consumer Information System2</b>	Day	1361	163	\$151.19	\$33,540,443.17
<b>Day Habilitation:</b>					\$91,952,303.28
<i>Day Habilitation 1:1</i>	15 minutes	1603	1956	\$15.07	\$47,251,502.76
<i>Day Habilitation 2:1</i>	15 minutes	45	1956	\$30.16	\$2,654,683.20
<i>Day Habilitation Small Group 2-5</i>	15 minutes	2593	1956	\$5.16	\$26,171,045.28
<i>Day Habilitation Large Group 6-10</i>	15 minutes	2593	1956	\$3.13	\$15,875,072.04
<b>Employment Discovery &amp; Customization</b>	Day	0	41	\$137.63	\$0.00
<b>Employment Services:</b>					\$104,715,699.80
<i>Discovery Milestone 1</i>	Milestone	252	1	\$709.67	\$178,836.84
<i>Discovery Milestone 2</i>	Milestone	252	1	\$2,129.00	\$536,508.00
<i>Discovery Milestone 3</i>	Milestone	252	1	\$1,419.33	\$357,671.16
<i>Follow Along Supports</i>	Month	2171	6	\$652.59	\$8,500,637.34
<i>Job Development</i>	15 minutes	1243	598	\$22.17	\$16,479,271.38
<i>On-going Job Supports</i>	15 minutes	2100	2179	\$17.19	\$78,659,721.00
<i>Co-Worker Employment Supports</i>	Item	1	2	\$500.00	\$1,000.00
<i>Customized Self-Employment Services</i>	Milestone	4	1	\$513.52	\$2,054.08
Environmental Assessments	Assessment	6	1	\$492.55	\$2,955.30
Environmental Modification	Item	13	1	\$7,601.00	\$98,813.00
Family and Peer Mentoring Supports	15 minutes	31	20	\$15.36	\$9,523.20
Family and Peer Mentoring Supports	Hour	1	5	\$70.03	\$350.15
Family Caregiver Training and Empowerment Services	Item	50	1	\$500.00	\$25,000.00
Housing Supports Services	15 minutes	95	40	\$17.20	\$65,360.00
Housing Supports Services	Hour	3	10	\$72.61	\$2,178.30
<b>Individual and Family Directed Goods and Services:</b>					\$372,530.00
<i>Goods and Services</i>	Item	182	4	\$385.00	\$280,280.00
<i>Staff Recruitment and Advertising</i>	Item	410	1	\$225.00	\$92,250.00
Live-In Caregiver Supports	Item	6	12	\$220.00	\$15,840.00

# Community Pathways Waiver

Medical Day Care	Day	907	147	\$104.61	\$13,947,546.69
Nursing Support Services	15 minutes	1155	60	\$26.09	\$1,808,037.00
Participant Education, Training, and Advocacy Supports	Item	50	1	\$500.00	\$25,000.00
<b>Personal Supports:</b>					\$242,937,672.00
<i>Personal Supports</i>	15 minutes	5218	3460	\$11.24	\$202,930,107.20
<i>Personal Supports Enhanced Supports</i>	15 minutes	812	3460	\$14.24	\$40,007,564.80
<i>Personal Supports 2:1</i>	15 minutes				
Remote Support Services	Item	5	12	\$1,200.00	\$72,000.00
<b>Respite Hour Provider Consumer Information System</b>	Hour	5	350	\$34.64	\$60,620.00
<b>Respite Care Services:</b>					\$20,385,611.30
<i>Daily</i>	Day	543	10	\$457.81	\$2,485,908.30
<i>Respite</i>	15 minutes	1472	1400	\$8.16	\$16,816,128.00
<i>Camp</i>	Item	445	1	\$2,435.00	\$1,083,575.00
<b>Shared Living Provider Consumer Information System</b>	Month	0	12	\$3,823.00	\$0.00
<b>Shared Living:</b>					\$14,584,574.52
<i>Shared Living Level 1</i>	Month	42	12	\$4,187.82	\$2,110,661.28
<i>Shared Living Level 2</i>	Month	153	12	\$4,807.09	\$8,825,817.24
<i>Shared Living Level 3</i>	Month	53	12	\$5,736.00	\$3,648,096.00
Support Broker Services	Item	1603	12	\$467.00	\$8,983,212.00
<b>Supported Employment Provider Consumer Information System</b>	Day	71	152	\$126.79	\$1,368,317.68
<b>Supported Living:</b>					\$75,270,077.56
<i>Supported Living</i>	Day	427	353	\$409.26	\$61,688,169.06
<i>Dedicated Supports Supported Living 1:1</i>	15 minutes	206	5725	\$10.67	\$12,583,664.50
<i>Dedicated Supports Supported Living 2:1</i>	15 minutes	12	3900	\$21.33	\$998,244.00
Transition Services	Item	58	1	\$2,010.00	\$116,580.00
<b>Career Exploration Provider Consumer Information System</b>	Day				\$135,014.88
<i>Facility</i>	Day	10	88	\$109.59	\$96,439.20
<i>Large Group</i>	Day	3	88	\$109.59	\$28,931.76
<i>Small Group</i>	Day	11	88	\$109.59	\$106,083.12
<b>Career Exploration: LTSS</b>					\$1,495,570.56
<i>Facility</i>	15 minutes	124	1056	\$3.94	\$515,919.36
<i>Large Group</i>	15 minutes	52	1056	\$2.66	\$146,065.92
<i>Small Group</i>	15 minutes	361	1056	\$3.54	\$1,349,504.64
Transportation	Item	1465	12	\$100.00	\$1,758,000.00
Vehicle Modification	Item	5	1	\$6,875.00	\$34,375.00
GRAND TOTAL:					\$2,361,713,351.41
TOTAL ESTIMATED UNDUPLICATED PARTICIPANTS (from Table J-2-a)					16,498

# Community Pathways Waiver

FACTOR D (Divide grand total by number of participants)					143,151.49
AVERAGE LENGTH OF STAY ON THE WAIVER					353

## Appendix J: Cost Neutrality

### Demonstration J-2: Derivation of Estimates (7 of 9)

#### d. Estimate of Factor D.

**i. Non-Concurrent Waiver.** Complete the following table for each waiver year. Enter data into the Unit, # Users, Avg. Units Per User, and Avg. Cost/Unit fields for all the Waiver Service/Component items. Select Save and Calculate to automatically calculate and populate the Component Costs and Total Costs fields. All fields in this table must be completed in order to populate the Factor D fields in the J-1 Composite Overview table.

#### Waiver Year: Year 3

Waiver Component	Unit	# Users	Avg. Units per User	Avg. Cost per Unit	Total Cost
<b>Assistive Technology and Services:</b>					\$329,742.72
<i>Assistive Technology and Services</i>	Item	288	1	\$1,118.69	\$322,182.72
<i>Monthly Service Fee</i>	Month	14	9	\$60.00	\$7,560.00
<b>Behavioral Support Services:</b>					\$13,689,022.55
<i>Assessment</i>	Assessment	658	1	\$1,868.68	\$1,229,591.44
<i>Plan</i>	Plan	658	1	\$1,865.47	\$1,227,479.26
<i>Consultation</i>	15 minutes	4135	46	\$42.78	\$8,137,183.80
<i>Brief Supports Implementation Services</i>	15 minutes	2469	55	\$22.79	\$3,094,768.05
<b>Community Development Services</b>					\$477,160,549.62
<i>1:1</i>	15 minutes	4053	4341	\$14.54	\$255,817,821.42
<i>2:1</i>	15 minutes	267	4402	\$31.20	\$36,670,420.80
<i>Small Group</i>	15 minutes	6090	2594	\$11.69	\$184,672,307.40
<b>Community Living-Enhanced Supports:</b>					\$27,333,710.58
<i>Service</i>	Day	62	332	\$780.87	\$16,073,428.08
<i>Retainer Fee</i>	Day	19	10	\$780.87	\$148,365.30
<i>Trial Experience</i>	Day	4	3	\$653.02	\$7,836.24
<i>Dedicated Supports Community Living Enhanced Supports 1:1</i>	15 minutes	56	13477	\$13.02	\$9,826,350.24
<i>Dedicated Supports Community Living Enhanced Supports 2:1</i>	15 minutes	6	8178	\$26.04	\$1,277,730.72
<b>Community Living-Group Home:</b>					\$1,654,145,758.86
<i>Service</i>	Day	7201	346	\$458.91	\$1,143,395,374.86
<i>Retainer Fee</i>	Day	2376	10	\$458.91	\$10,903,701.60

# Community Pathways Waiver

<i>Trial Experience</i>	Day	4	3	\$333.84	\$4,006.08
<i>Dedicated Supports Community Living Group Home 1:1</i>	15 minutes	3956	8446	\$12.35	\$412,642,843.60
<i>Dedicated Supports Community Living Group Home 2:1</i>	15 minutes	257	13832	\$24.53	\$87,199,832.72
<b>Day Habilitation:</b>					\$226,281,079.08
<i>Day Habilitation 1:1</i>	15 minutes	1852	3618	\$18.74	\$125,568,044.64
<i>Day Habilitation 2:1</i>	15 minutes	62	4347	\$38.68	\$10,424,801.52
<i>Day Habilitation Small Group 2-5</i>	15 minutes	4259	2806	\$6.54	\$78,157,931.16
<i>Day Habilitation Large Group 6-10</i>	15 minutes	1831	1648	\$4.02	\$12,130,301.76
<b>Employment Services:</b>					\$93,577,696.06
<i>Discovery Milestone 1</i>	Milestone	206	1	\$950.83	\$195,870.98
<i>Discovery Milestone 2</i>	Milestone	206	1	\$2,847.18	\$586,519.08
<i>Discovery Milestone 3</i>	Milestone	206	1	\$1,867.13	\$384,628.78
<i>Follow Along Supports</i>	Month	2551	9	\$765.31	\$17,570,752.29
<i>Job Development</i>	15 minutes	1152	718	\$28.92	\$23,920,773.12
<i>On-going Job Supports</i>	15 minutes	1913	1269	\$20.97	\$50,906,709.09
<i>Co-Worker Employment Supports</i>	Item	4	1	\$2,532.45	\$10,129.80
<i>Customized Self-Employment Services</i>	Milestone	4	1	\$578.23	\$2,312.92
Environmental Assessments	Assessment	144	1	\$554.95	\$79,912.80
Environmental Modification	Item	82	1	\$10,625.98	\$871,330.36
Family and Peer Mentoring Supports	15 minutes	41	133	\$16.23	\$88,502.19
Family Caregiver Training and Empowerment Services	Item	8	1	\$767.21	\$6,137.68
Housing Supports Services	15 minutes	576	66	\$20.87	\$793,393.92
<b>Individual and Family Directed Goods and Services:</b>					\$19,420,368.20
<i>Goods and Services</i>	Item	1420	1	\$4,749.00	\$6,743,580.00
<i>Staff Recruitment and Advertising</i>	Item	226	1	\$283.70	\$64,116.20
<i>Day to Day Administrative Support</i>	15 minutes	3240	480	\$8.11	\$12,612,672.00
Live-In Caregiver Supports	Item	8	11	\$852.92	\$75,056.96
Medical Day Care	Day	658	172	\$117.76	\$13,327,605.76
Nursing Support Services	15 minutes	1358	129	\$27.28	\$4,778,964.96
Participant Education, Training, and Advocacy Supports	Item	4	1	\$542.03	\$2,168.12
<b>Personal Supports:</b>					\$683,736,116.40
<i>Personal Supports</i>	15 minutes	7201	6966	\$10.92	\$547,770,852.72
<i>Personal Supports Enhanced Supports</i>	15 minutes	967	10164	\$13.56	\$133,275,653.28
<i>Personal Supports 2:1</i>	15 minutes	24	7170	\$15.63	\$2,689,610.40
Remote Support Services	Item	8	1	\$10,752.90	\$86,023.20
<b>Respite Care Services:</b>					\$22,925,015.90
<i>Daily</i>	Day	123	19	\$538.28	\$1,257,960.36
<i>Hourly</i>	15 minutes	2002	1329	\$7.86	\$20,912,771.88
<i>Camp</i>	Item	247	1	\$3,053.78	\$754,283.66

# Community Pathways Waiver

<b>Shared Living:</b>					\$10,195,099.50
<i>Shared Living Level 1</i>	Month	21	10	\$4,554.94	\$956,537.40
<i>Shared Living Level 2</i>	Month	123	10	\$5,228.52	\$6,431,079.60
<i>Shared Living Level 3</i>	Month	45	10	\$6,238.85	\$2,807,482.50
Support Broker Services	15 minutes	3456	160	\$17.17	\$9,494,323.20
<b>Supported Living:</b>					\$121,390,901.52
<i>Supported Living</i>	Day	545	312	\$622.99	\$105,933,219.60
<i>Dedicated Supports Supported Living 1:1</i>	15 minutes	165	6324	\$12.58	\$13,126,726.80
<i>Dedicated Supports Supported Living 2:1</i>	15 minutes	12	7319	\$26.54	\$2,330,955.12
Transition Services	Item	12	1	\$3,303.82	\$39,645.84
<b>Career Exploration:</b>					\$2,690,536.62
<i>Facility</i>	15 minutes	66	1133	\$4.81	\$359,682.18
<i>Large Group</i>	15 minutes	12	2474	\$3.98	\$118,158.24
<i>Small Group</i>	15 minutes	185	2652	\$4.51	\$2,212,696.20
Transportation	Item	1728	1	\$1,851.28	\$3,199,011.84
Vehicle Modification	Item	16	1	\$7,777.06	\$124,432.96
<b>GRAND TOTAL:</b>					\$3,385,842,107.40
TOTAL ESTIMATED UNDUPLICATED PARTICIPANTS (from Table J-2-a)					20,573
FACTOR D (Divide grand total by number of participants)					\$164,576.98
AVERAGE LENGTH OF STAY ON THE WAIVER					358

## Appendix J: Cost Neutrality

### Demonstration J-2: Derivation of Estimates (8 of 9)

**Waiver Year: Year 4 (only appears if applicable based on Item 1-C)**

<b>Waiver Component</b>	<b>Unit</b>	<b># Users</b>	<b>Avg. Units per User</b>	<b>Avg. Cost per Unit</b>	<b>Total Cost</b>
<b>Assistive Technology and Services:</b>					\$335,220.10
<i>Assistive Technology and Services</i>	Item	290	1	\$1,118.69	\$324,420.10
<i>Monthly Service Fee</i>	Month	15	12	\$60.00	\$10,800.00
<b>Behavioral Support Services:</b>					\$14,195,174.84
<i>Assessment</i>	Assessment	663	1	\$1,924.74	\$1,276,102.62
<i>Plan</i>	Plan	663	1	\$1,921.43	\$1,273,908.09
<i>Consultation</i>	15 minutes	4163	46	\$44.06	\$8,437,401.88
<i>Brief Supports Implementation Services</i>	15 minutes	2485	55	\$23.47	\$3,207,762.25
<b>Community Development Services:</b>					\$494,823,858.52

# Community Pathways Waiver

<i>1:1</i>	15 minutes	4080	4341	\$14.98	\$265,314,974.40
<i>2:1</i>	15 minutes	269	4402	\$32.14	\$38,058,195.32
<i>Small Group</i>	15 minutes	6130	2594	\$12.04	\$191,450,688.80
<b>Community Living-Enhanced Supports:</b>					\$28,153,291.20
<i>Service</i>	Day	62	332	\$804.30	\$16,555,711.20
<i>Retainer Fee</i>	Day	19	10	\$804.30	\$152,817.00
<i>Trial Experience</i>	Day	4	3	\$672.61	\$8,071.32
<i>Dedicated Supports Community Living Enhanced Supports 1:1</i>	15 minutes	56	13477	\$13.41	\$10,120,687.92
<i>Dedicated Supports Community Living Enhanced Supports 2:1</i>	15 minutes	6	8178	\$26.82	\$1,316,003.76
<b>Community Living-Group Home:</b>					\$1,715,300,453.36
<i>Service</i>	Day	7249	346	\$472.68	\$1,185,554,232.72
<i>Retainer Fee</i>	Day	2392	10	\$472.68	\$11,306,505.60
<i>Trial Experience</i>	Day	4	3	\$343.86	\$4,126.32
<i>Dedicated Supports Community Living Group Home 1:1</i>	15 minutes	3983	8446	\$12.72	\$427,906,116.96
<i>Dedicated Supports Community Living Group Home 2:1</i>	15 minutes	259	13832	\$25.27	\$90,529,471.76
<b>Day Habilitation:</b>					\$234,547,614.60
<i>Day Habilitation 1:1</i>	15 minutes	1864	3618	\$19.30	\$130,158,273.60
<i>Day Habilitation 2:1</i>	15 minutes	62	4347	\$39.84	\$10,737,437.76
<i>Day Habilitation Small Group 2-5</i>	15 minutes	4287	2806	\$6.74	\$81,077,630.28
<i>Day Habilitation Large Group 6-10</i>	15 minutes	1843	1648	\$4.14	\$12,574,272.96
<b>Employment Services:</b>					\$97,042,797.59
<i>Discovery Milestone 1</i>	Milestone	207	1	\$979.35	\$202,725.45
<i>Discovery Milestone 2</i>	Milestone	207	1	\$2,932.60	\$607,048.20
<i>Discovery Milestone 3</i>	Milestone	207	1	\$1,923.14	\$398,089.98
<i>Follow Along Supports</i>	Month	2568	9	\$788.27	\$18,218,496.24
<i>Job Development</i>	15 minutes	1160	718	\$29.79	\$24,811,495.20
<i>On-going Job Supports</i>	15 minutes	1926	1269	\$21.60	\$52,792,430.40
<i>Co-Worker Employment Supports</i>	Item	4	1	\$2,532.45	\$10,129.80
<i>Customized Self-Employment Services</i>	Milestone	4	1	\$595.58	\$2,382.32
Environmental Assessments	Assessment	145	1	\$571.60	\$82,882.00
Environmental Modification	Item	83	1	\$10,625.98	\$881,956.34
Family and Peer Mentoring Supports	15 minutes	41	133	\$16.72	\$91,174.16
Family Caregiver Training and Empowerment Services	Item	8	1	\$767.21	\$6,137.68
Housing Supports Services	15 minutes	580	66	\$21.50	\$823,020.00
<b>Individual and Family Directed Goods and Services:</b>					\$19,925,100.60
<i>Goods and Services</i>	Item	1429	1	\$4,749.00	\$6,786,321.00
<i>Staff Recruitment and Advertising</i>	Item	228	1	\$283.70	\$64,683.60
<i>Day to Day Administrative Support</i>	15 minutes	3262	480	\$8.35	\$13,074,096.00

# Community Pathways Waiver

Live-In Caregiver Supports	Item	8	11	\$852.92	\$75,056.96
Medical Day Care	Day	663	172	\$121.29	\$13,831,426.44
Nursing Support Services	15 minutes	1367	129	\$28.10	\$4,955,238.30
Participant Education, Training, and Advocacy Supports	Item	4	1	\$542.03	\$2,168.12
<b>Personal Supports:</b>					\$709,591,001.34
<i>Personal Supports</i>	15 minutes	7249	6966	\$11.25	\$568,086,007.50
<i>Personal Supports Enhanced Supports</i>	15 minutes	973	10164	\$13.97	\$138,157,320.84
<i>Personal Supports 2:1</i>	15 minutes	29	7170	\$16.10	\$3,347,673.00
Remote Support Services	Item	8	1	\$10,752.90	\$86,023.20
<b>Respite Care Services:</b>					\$23,757,901.80
<i>Daily</i>	Day	124	19	\$554.43	\$1,306,237.08
<i>Hourly</i>	15 minutes	2015	1329	\$8.10	\$21,691,273.50
<i>Camp</i>	Item	249	1	\$3,053.78	\$760,391.22
<b>Shared Living:</b>					\$10,619,074.30
<i>Shared Living Level 1</i>	Month	21	10	\$4,691.59	\$985,233.90
<i>Shared Living Level 2</i>	Month	124	10	\$5,385.38	\$6,677,871.20
<i>Shared Living Level 3</i>	Month	46	10	\$6,426.02	\$2,955,969.20
Support Broker Services	15 minutes	3479	160	\$17.69	\$9,846,961.60
<b>Supported Living:</b>					\$125,918,502.00
<i>Supported Living</i>	Day	549	312	\$641.68	\$109,912,083.84
<i>Dedicated Supports Supported Living 1:1</i>	15 minutes	166	6324	\$12.96	\$13,605,200.64
<i>Dedicated Supports Supported Living 2:1</i>	15 minutes	12	7319	\$27.34	\$2,401,217.52
Transition Services	Item	12	1	\$3,303.82	\$39,645.84
<b>Career Exploration:</b>					\$2,785,586.70
<i>Facility</i>	15 minutes	66	1133	\$4.95	\$370,151.10
<i>Large Group</i>	15 minutes	12	2474	\$4.10	\$121,720.80
<i>Small Group</i>	15 minutes	186	2652	\$4.65	\$2,293,714.80
Transportation	Item	1740	1	\$1,851.28	\$3,221,227.20
Vehicle Modification	Item	17	1	\$7,777.06	\$132,210.02
<b>GRAND TOTAL:</b>					\$3,511,070,704.81
TOTAL ESTIMATED UNDUPLICATED PARTICIPANTS (from Table J-2-a)					20,710
FACTOR D (Divide grand total by number of participants)					\$169,535.04
AVERAGE LENGTH OF STAY ON THE WAIVER					358

## Appendix J: Cost Neutrality Demonstration

### J-2: Derivation of Estimates (9 of 9)

Waiver Year: Year 5 (only appears if applicable based on Item I-C)

# Community Pathways Waiver

Waiver Component	Unit	# Users	Avg. Units per User	Avg. Cost per Unit	Total Cost
<b>Assistive Technology and Services:</b>					\$346,407.00
<i>Assistive Technology and Services</i>	Item	300	1	\$1,118.69	\$335,607.00
<i>Monthly Service Fee</i>	Month	15	12	\$60.00	\$10,800.00
<b>Behavioral Support Services:</b>					\$15,138,496.48
<i>Assessment</i>	Assessment	686	1	\$1,982.48	\$1,359,981.28
<i>Plan</i>	Plan	686	1	\$1,979.07	\$1,357,642.02
<i>Consultation</i>	15 minutes	4311	46	\$45.38	\$8,999,126.28
<i>Brief Supports Implementation Services</i>	15 minutes	2574	55	\$24.17	\$3,421,746.90
<b>Community Development Services:</b>					\$527,836,645.35
<i>1:1</i>	15 minutes	4225	4341	\$15.43	\$282,997,386.75
<i>2:1</i>	15 minutes	279	4402	\$33.10	\$40,652,029.80
<i>Small Group</i>	15 minutes	6348	2594	\$12.40	\$204,187,228.80
<b>Community Living-Enhanced Supports:</b>					\$29,918,261.44
<i>Service</i>	Day	64	332	\$828.43	\$17,602,480.64
<i>Retainer Fee</i>	Day	19	10	\$828.43	\$157,401.70
<i>Trial Experience</i>	Day	4	3	\$692.79	\$8,313.48
<i>Dedicated Supports Community Living Enhanced Supports 1:1</i>	15 minutes	58	13477	\$13.81	\$10,794,807.46
<i>Dedicated Supports Community Living Enhanced Supports 2:1</i>	15 minutes	6	8178	\$27.62	\$1,355,258.16
<b>Community Living-Group Home:</b>					\$1,829,258,861.40
<i>Service</i>	Day	7506	346	\$486.86	\$1,264,412,421.36
<i>Retainer Fee</i>	Day	2477	10	\$486.86	\$12,059,522.20
<i>Trial Experience</i>	Day	4	3	\$354.18	\$4,250.16
<i>Dedicated Supports Community Living Group Home 1:1</i>	15 minutes	4124	8446	\$13.10	\$456,290,082.40
<i>Dedicated Supports Community Living Group Home 2:1</i>	15 minutes	268	13832	\$26.03	\$96,492,585.28
<b>Day Habilitation:</b>					\$250,080,111.80
<i>Day Habilitation 1:1</i>	15 minutes	1930	3618	\$19.88	\$138,816,871.20
<i>Day Habilitation 2:1</i>	15 minutes	64	4347	\$41.04	\$11,417,656.32
<i>Day Habilitation Small Group 2-5</i>	15 minutes	4439	2806	\$6.94	\$86,443,487.96
<i>Day Habilitation Large Group 6-10</i>	15 minutes	1909	1648	\$4.26	\$13,402,096.32
<b>Employment Services:</b>					\$103,485,815.82
<i>Discovery Milestone 1</i>	Milestone	214	1	\$1,008.73	\$215,868.22
<i>Discovery Milestone 2</i>	Milestone	214	1	\$3,020.58	\$646,404.12
<i>Discovery Milestone 3</i>	Milestone	214	1	\$1,980.83	\$423,897.62
<i>Follow Along Supports</i>	Month	2659	9	\$811.92	\$19,430,057.52
<i>Job Development</i>	15 minutes	1201	718	\$30.68	\$26,455,916.24

# Community Pathways Waiver

<i>On-going Job Supports</i>	15 minutes	1994	1269	\$22.25	\$56,301,088.50
<i>Co-Worker Employment Supports</i>	Item	4	1	\$2,532.45	\$10,129.80
<i>Customized Self-Employment Services</i>	Milestone	4	1	\$613.45	\$2,453.80
Environmental Assessments	Assessment	150	1	\$588.75	\$88,312.50
Environmental Modification	Item	86	1	\$10,625.98	\$913,834.28
Family and Peer Mentoring Supports	15 minutes	43	133	\$17.22	\$98,481.18
Family Caregiver Training and Empowerment Services	Item	9	1	\$767.21	\$6,904.89
Housing Supports Services	15 minutes	600	66	\$22.15	\$877,140.00
<b>Individual and Family Directed Goods and Services:</b>					\$21,039,857.20
<i>Goods and Services</i>	Item	1480	1	\$4,749.00	\$7,028,520.00
<i>Staff Recruitment and Advertising</i>	Item	236	1	\$283.70	\$66,953.20
<i>Day to Day Administrative Support</i>	15 minutes	3378	480	\$8.60	\$13,944,384.00
Live-In Caregiver Supports	Item	9	11	\$852.92	\$84,439.08
Medical Day Care	Day	686	172	\$124.93	\$14,740,740.56
Nursing Support Services	15 minutes	1415	129	\$28.94	\$5,282,562.90
Participant Education, Training, and Advocacy Supports	Item	4	1	\$542.03	\$2,168.12
<b>Personal Supports:</b>					\$757,000,363.32
<i>Personal Supports</i>	15 minutes	7506	6966	\$11.59	\$606,003,965.64
<i>Personal Supports Enhanced Supports</i>	15 minutes	1008	10164	\$14.39	\$147,430,039.68
<i>Personal Supports 2:1</i>	15 minutes	30	7170	\$16.58	\$3,566,358.00
Remote Support Services	Item	9	1	\$10,752.90	\$96,776.10
<b>Respite Care Services:</b>					\$25,316,505.34
<i>Daily</i>	Day	129	19	\$571.06	\$1,399,668.06
<i>Hourly</i>	15 minutes	2087	1329	\$8.34	\$23,132,015.82
<i>Camp</i>	Item	257	1	\$3,053.78	\$784,821.46
<b>Shared Living:</b>					\$11,281,180.00
<i>Shared Living Level 1</i>	Month	21	10	\$4,832.34	\$1,014,791.40
<i>Shared Living Level 2</i>	Month	129	10	\$5,546.94	\$7,155,552.60
<i>Shared Living Level 3</i>	Month	47	10	\$6,618.80	\$3,110,836.00
Support Broker Services	15 minutes	3603	160	\$18.22	\$10,503,465.60
<b>Supported Living:</b>					\$134,327,879.20
<i>Supported Living</i>	Day	568	312	\$660.93	\$117,127,370.88
<i>Dedicated Supports Supported Living 1:1</i>	15 minutes	172	6324	\$13.35	\$14,521,168.80
<i>Dedicated Supports Supported Living 2:1</i>	15 minutes	13	7319	\$28.16	\$2,679,339.52
Transition Services	Item	13	1	\$3,303.82	\$42,949.66
<b>Career Exploration:</b>					\$2,986,120.78
<i>Facility</i>	15 minutes	69	1133	\$5.10	\$398,702.70
<i>Large Group</i>	15 minutes	13	2474	\$4.22	\$135,723.64
<i>Small Group</i>	15 minutes	193	2652	\$4.79	\$2,451,694.44

# Community Pathways Waiver

Transportation	Item	1801	1	\$1,851.28	\$3,334,155.28
Vehicle Modification	Item	17	1	\$7,777.06	\$132,210.02
GRAND TOTAL:					\$3,744,220,645.30
TOTAL ESTIMATED UNDUPLICATED PARTICIPANTS (from Table J-2-a)					21,446
FACTOR D (Divide grand total by number of participants)					\$174,588.30
AVERAGE LENGTH OF STAY ON THE WAIVER					358