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November 25, 2024

Elizabeth Doyle, Section Manager
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Bureau of Rate Setting
Division Medicaid Services
1 West Wilson Street
Madison, WI 53701-0309
Sent via email: elizabeth.doyle@dhs.wisconsin.gov

Re: CY 2025 Family Care Capitation Rate Report

Dear Elizabeth:

Thank you for the opportunity to assist the Wisconsin Department of Health Services (DHS) with this important project. Our report summarizes the development of CY 2025 capitation rates for Wisconsin's Family Care program.



Please contact us with any questions.

Sincerely,

Michael C. Cook, FSA, MAAA
Principal and Consulting Actuary

MCC/tm

Attachments

MILLIMAN REPORT

State of Wisconsin

Department of Health Services

Calendar Year 2025 Capitation Rate Development Family Care Program

November 25, 2024

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I. EXECUTIVE SUMMARY

This report documents the development of the January 2025 to December 2025 (CY 2025) capitation rates for Wisconsin's Family Care program. The Wisconsin Department of Health Services (DHS) retained Milliman to calculate, document, and certify its capitation rate development. We developed the capitation rates using the methodology described in this report.

Our role is to certify that the CY 2025 capitation rates produced by the rating methodology are actuarially sound to comply with Centers for Medicare and Medicaid Services (CMS) regulations. We developed actuarially sound capitation rates using published guidance from the American Academy of Actuaries (AAA), CMS, and federal regulations to ensure compliance with generally accepted actuarial practices and regulatory requirements. Specific Actuarial Standards of Practice (ASOPs) we considered include:

- ASOP No. 1 – Introductory Actuarial Standard of Practice
- ASOP No. 5 – Incurred Health and Disability Claims
- ASOP No. 12 – Risk Classification
- ASOP No. 23 – Data Quality
- ASOP No. 25 – Credibility Procedures
- ASOP No. 41 – Actuarial Communications
- ASOP No. 42 – Health and Disability Actuarial Assets and Liabilities Other Than Liabilities for Incurred Claims
- ASOP No. 45 – The Use of Health Status Based Risk Adjustment Methodologies
- ASOP No. 49 – Medicaid Managed Care Capitation Rate Development and Certification
- ASOP No. 56 – Modeling
- Other applicable standards of practice

CY 2025 CAPITATION RATES

The statewide average CY 2025 capitation rate is \$4,968.18 for the Nursing Home Level of Care (NH LOC) population and \$756.59 for the Non-Nursing Home Level of Care (Non-NH LOC) population. Table 1 shows the statewide rate change from the October 2024 through December 2024 (2024 Q4) capitation rate recertification dated November 19, 2024 to the CY 2025 capitation rates for each population. The 2024 Q4 capitation rates represent the most recent capitation rate certification; however, most assumptions made for 2024 Q4 capitation rates are made for all capitation rates from CY 2024.

Table 1 Wisconsin Department of Health Services Family Care Program Comparison of 2024 Q4 and CY 2025 Capitation		
	NH LOC	Non-NH LOC
2024 Q4 Rates	\$4,620.03	\$686.24
CY 2025 Rates	\$4,968.18	\$756.59
% Change	7.5%	10.3%

The 7.5% change in capitation rate for 2024 Q4 to CY 2025 for the NH LOC population can be broken down as follows:

- 1.8% increase due to the actual CY 2023 base cohort costs compared to the CY 2023 costs predicted as part of CY 2024 rate development. The projection of CY 2023 costs in CY 2024 rate development included trend and programmatic rate increase estimates.
 - 1.2% increase due to differences in the CY 2023 to CY 2024 trends estimated in CY 2024 rate setting compared to those used in CY 2025 rate setting.
 - 2.7% increase due to application of service trend to project CY 2024 costs to CY 2025.
 - 1.3% increase due to application of acuity trend to project CY 2024 acuity to CY 2025.
- 0.2% increase due to differences in the target group distribution between the CY 2023 base data and CY 2025 projected enrollment.

- Negligible change due to the restatement of legislated changes in CY 2023 and CY 2024 nursing home reimbursement and personal care.
- 0.9% increase due to application of nursing home reimbursement and personal care to project CY 2024 to CY 2025.
- 0.7% decrease due to differences in the impact of the application of HCBS minimum fee schedule in 2024 Q4 and CY 2025 due to changes in provider reimbursement rates between the CY 2022 and CY 2023 base data underlying each set of capitation rates and incremental unit cost trend prior to the application of this adjustment.
- Negligible change due to the differences in the administrative load as a percent of the capitation rate.

The change in capitation rates for the DD, PD, and FE target groups is 8.7%, 4.3%, and 8.0%, respectively. The rate change by target group differs from the composite change due to differing base period data changes, target group-specific service cost and acuity trend values, and the varying impact of provider rate increases.

The 10.3% change in capitation rate certification for CY 2024 to CY 2025 for the Non-NH LOC population can be broken down as follows:

- 5.8% increase due to the actual CY 2023 base cohort costs and the CY 2023 costs predicted as part of CY 2024 rate development. The projection of CY 2023 costs in CY 2024 rate development included trend and programmatic rate increase estimates.
- 0.4% increase due to differences in the CY 2023 to CY 2024 trends estimated in CY 2024 rate setting compared to those used in CY 2025 rate setting.
- 3.1% increase due to application of service trend to project CY 2024 costs to CY 2025.
- 0.5% increase due to application of acuity trend to project CY 2024 acuity to CY 2025.
- 0.2% increase due to application of nursing home reimbursement and personal care to project CY 2024 to CY 2025.
- Negligible change due to differences in the impact of the application of HCBS minimum fee schedule in 2024 Q4 and CY 2025 due to changes in provider reimbursement rates between the CY 2022 and CY 2023 base data underlying each set of capitation rates and incremental unit cost trend prior to the application of this adjustment.
- 0.1% decrease due to the differences in the administrative loads as a percent of the capitation rates.

Projected CY 2025 expenditures split between federal and state liability are included as Exhibit M1 to M3.

Please note, the sum of the rate change drivers may not equal the total rate change, because the change drivers are calculated as multiplicative factors. The product of “one plus” each change driver equals “one plus” the total rate change.

COVID-19 CONSIDERATIONS IN CY 2025 RATE DEVELOPMENT

The COVID-19 pandemic and determination of a public health emergency (PHE) have impacted health care costs significantly since March 2020, though we believe the 2023 base data underlying CY 2025 capitation rates has substantially moved past these impacts to an environment that is appropriate to use for projections moving forward. To develop our best estimates of future costs, we considered a wide array of potential impacts based on information from publicly available sources, internal Milliman research, and MCO feedback. The program continues to include a risk corridor around target medical loss ratios to provide financial protection to the state and MCOs.

The capitation rates do not currently include explicit provisions for expected vaccination administration fees or other costs related to COVID-19 in CY 2025 above CY 2023 levels. Should such costs prove to be material and in excess of any continuing utilization decreases in CY 2025, we will consider revising capitation rates.

We made no other explicit adjustment for the PHE since the 2023 experience utilization is generally consistent with pre-pandemic levels.

METHODOLOGY CHANGES FROM CY 2024 RATES

This section describes significant methodology changes from the CY 2024 capitation rate methodology.

GSR Consolidation

Effective January 1, 2025, GSRs formerly identified as GSRs 5, 12, and 14 will combine into GSR 5; GSRs 12 and 14 will cease to exist. Experience shown on Exhibits A and B for NH LOC (Exhibits H and I for Non-NH LOC) show these GSRs split (consistent with the definition of these GSRs in 2023), while Exhibits C for NH LOC (Exhibits J for Non-NH LOC) onward reflect the combination of these GSRs.

Service Area Changes

Effective January 1, 2025, LCI began operations in the consolidated GSR 5.

DATA RELIANCE AND IMPORTANT CAVEATS

Milliman prepared this report for the specific purpose of developing the CY 2025 Family Care capitation rates. This report should not be used for any other purpose. This report has been prepared solely for the internal business use of, and is only to be relied upon by, the management of DHS. We understand this report may be shared with participating MCOs, CMS, and other interested parties. Milliman does not intend to benefit, or create a legal duty to, any third-party recipient of its work. This report should only be reviewed in its entirety.

The results of this report are technical in nature and are dependent upon specific assumptions and methods. No party should rely on these results without a thorough understanding of those assumptions and methods. Such an understanding may require consultation with qualified professionals.

Milliman has developed certain models to estimate the values included in this report. The intent of the models was to estimate CY 2025 capitation rates for Family Care. We have reviewed the models, including their inputs, calculations, and outputs for consistency, reasonableness, and appropriateness to the intended purpose and in compliance with generally accepted actuarial practice and relevant actuarial standards of practice (ASOP).

The models rely on data and information as input to the models. We used MCO financial reporting, as well as encounter, eligibility, and functional screen data for CY 2021 through 2023 and May 2024, and other information provided by DHS to develop the Family Care capitation rates shown in this report. We have relied upon this data and information provided by DHS for this purpose and accepted it without audit. To the extent that the data and information provided is not accurate, or is not complete, the values provided in this report may likewise be inaccurate or incomplete. The models, including all input, calculations, and output may not be appropriate for any other purpose. Please see Appendix B for a full list of the data relied upon to develop the CY 2025 Family Care capitation rates.

Differences between the capitation rates and actual MCO experience will depend on the extent to which future experience conforms to the assumptions made in the capitation rate development calculations. It is certain that actual experience will not conform exactly to the assumptions used. Actual amounts will differ from projected amounts to the extent that actual experience is higher or lower than expected. These rates may not be appropriate for all MCOs. Any MCO considering participating in Family Care should consider their unique circumstances before deciding to contract under these rates.

Michael Cook is an actuary for Milliman, member of the American Academy of Actuaries, and meets the Qualification Standards of the Academy to render the actuarial opinion contained herein. To the best of his knowledge and belief, this report is complete and accurate and has been prepared in accordance with generally recognized and accepted actuarial principles and practices.

II. BACKGROUND

Family Care is a full-risk, comprehensive Medicaid managed care delivery system for the full range of long-term care (LTC) services, which strives to foster people's independence and quality of life. Since 2000, Family Care has served people ages 18 and older with physical disabilities, people with intellectual / developmental disabilities, and frail elders, with the specific goals of:

- Giving people better choices about where they live and what kinds of services and supports they get to meet their needs
- Improving access to services
- Improving quality through a focus on health and social outcomes
- Creating a cost-effective system for the future

Eligibility for Family Care is determined through the Wisconsin Long Term Care Functional Screen and detailed decision trees involving individual information about the type of disability, activities of daily living, instrumental activities of daily living, and certain other medical diagnoses and health related services. While enrollment in Family Care is not mandatory, in recent years the significant majority of nursing home eligible beneficiaries in regions in which Family Care operates have been enrolled in Family Care, with others being enrolled in a self-directed care option or fee-for-service (FFS). The percentage of eligibles who enroll in the program has grown slowly over time. The risk adjustment model mechanism helps to adjust rates for any differences in average member acuity, as the enrollment percentage increases.

Since July 2018 Family Care has operated statewide in Wisconsin. In 2025 the state will be comprised of 11 distinct GSRs for rate setting and other purposes. Please see Appendix A for a map showing the counties included in each GSR. MCOs contract with service providers to deliver all State Plan and waiver LTC services. Acute care services are provided under FFS Medicaid. In select counties, individuals eligible for Family Care can enroll in the Family Care Partnership program, in which both acute and long-term care services are managed by MCOs. The Family Care Partnership program capitation rates are developed in a separate report.

III. NURSING HOME LEVEL OF CARE METHODOLOGY OVERVIEW

This section of the report describes the CY 2025 Family Care capitation rate methodology for the NH LOC population.

The methodology used to project the MCO encounter data underlying the calculation of the capitation rates can be outlined in the following steps:

1. Extract and summarize CY 2023 MCO encounter base experience data for the NH LOC population by target group.
2. Apply IBNR and other adjustments to project CY 2025 services costs.
3. Calculate MCO / GSR specific risk adjusted base rates using May 2024 screens and the functional status acuity model relativities.
4. Apply adjustments to the risk adjusted base rates to project CY 2025 services costs for each MCO / GSR combination and target group.
5. Add allowances for non-benefit costs and margin.
6. Blend the projected CY 2025 service costs, including allowances for non-benefit costs, by target group into an MCO / GSR specific projected cost.

Each of the above steps is described in detail below.

STEP 1: EXTRACT AND SUMMARIZE ENCOUNTER BASE EXPERIENCE DATA

In this step we summarize the MCO encounter experience for CY 2023 by MCO / GSR and service category for the NH LOC populations enrolled in the Family Care program.

Exhibit A shows the summarized CY 2023 MCO encounter base experience data by MCO / GSR combination and target group.

Base Data

We received detailed MCO encounter claims data from DHS for claims with dates of service between January 2022 and December 2023 with dates of payment through February 2024. This data reflects payments net of any third-party liability. These costs are also gross of member cost share / patient liability, as DHS adjusts capitation payments to MCOs for each member to reflect that particular member's cost share (also known as Post Eligibility Treatment of Income).

We believe the encounter data is of appropriate quality and completeness to use as the primary basis for developing actuarially sound rates for the Wisconsin Family Care program. We reviewed the data and validated both provider service and case management expenditures against financial statements for accuracy and completeness of the data provided. We did not identify any material concerns with the quality or availability of the data with respect to total claims in aggregate and detailed summaries by category of service.

The base period data includes only those individuals actually enrolled in the Wisconsin Family Care program, so no adjustment for retroactive eligibility periods is needed. The base experience data also excludes 0.14% of total expenses for which there is not a corresponding member eligibility record. No member supplemental room and board expenses are included in the base data. The base data used in capitation rate setting is net of historical recoveries of provider overpayments.

The CY 2025 rate methodology relies on CY 2023 MCO encounter data for all MCOs in all GSRs.

There are no in lieu of services provided to NH LOC enrollees in the base data or expected for the contract period.

The base data is adjusted for encounters rejected for EVV but expected to be covered in 2025.

MCOs provided attestations that the base experience data complies with requirements of 438.602(i) in that no claims paid by an MCO to a provider outside of the United States are included in the base period data.

Target Group Assignment

The NH LOC capitation rates rely on a member's classification into one of three target groups: Developmentally Disabled (DD), Physically Disabled (PD), and Frail Elderly (FE). Each Family Care enrollee is assigned a target group based on information collected using Long-Term Care Functional Screens (LTCFS), administered to program participants at least annually. The assigned target group is only valid for the period covered by the screen. Therefore, individuals could potentially change target groups at each screening.

For members in the PD or FE target groups as defined by LTCFS, we calculated the age for each member as of the first day of each enrollment month; thus, a member could be defined as PD in their most recent functional screen, but would be assigned to the FE target group once achieving age 65. Based on this age calculation, we transitioned a small number of members from FE members to the PD target group (if their calculated age was 64 or below) or from the PD target group to the FE target group (if their calculated age was 65 or above).

The experience summaries shown in Exhibit A reflects this target group assignment.

Case Management Expenditures

Case management expenditures are included in the base cohort data as a service cost, consistent with contract terms. The case management expenses are trued up to financial statements due to the difficulty in properly and completely reporting full-service cost information in the encounter data format.

Table 2 below shows the CY 2023 encounter data to financial statement reconciliation adjustment for case management expenditures.

Table 2 Wisconsin Department of Health Services Family Care Program Encounter Data to Financial Statement Reconciliation Adjustment For Case Management Services	
MCO	CY 2023*
CCI	-0.6%
Inclusa	11.2%
LCI	5.6%
MCW	20.1%

**Adjustments are negative when case management reported in financials are less than the case management amounts included in encounters.*

Non-Covered Services Adjustments

We removed approximately 0.23% of expenditures for services or service locations not covered under the Family Care benefit set from the base data. This includes any payments made for member supplemental room and board expenses not included in the Institutional or Residential categories of service. No services were provided in lieu of a covered service for the Nursing Home LOC population.

Institution for Mental Disease (IMD) services are not a covered benefit under Family Care. Such services are covered via the FFS delivery system. If individuals enter an IMD, they are disenrolled from the Family Care program. Therefore, no adjustment to the base data is required.

Sub-Capitated Services

The base data does not include any sub-capitated services as the MCOs operating in Family Care currently do not contract for sub-capitated services.

STEP 2: APPLY IBNR ASSUMPTIONS AND OTHER BASE DATA ADJUSTMENTS

IBNR

We used Milliman's Claim Reserve Estimation Workbook (CREW) to calculate the incurred but not reported (IBNR) adjustment factors shown in Table 3 below. We developed completion factors (CFs) by MCO in aggregate across all service types due to the small magnitude of the adjustments, using experience data for the combined NH LOC and Non-NH LOC populations. CREW calculates IBNR reserve estimates by blending two different estimation methods: the lag completion method and the projection method.

The lag method reflects the historical average lag between the time a claim is incurred and the time it is paid. To measure this average lag, claims are separated by month of incurral and month of payment. Using this data, historical lag relationships are used to estimate ultimate incurred claims (i.e., total claims for a given incurral month after all claims are paid) for a specific incurral month based on cumulative paid claims for each month.

The projection method develops estimates for incurred claims in recent incurral months by trending an average base period incurred cost per unit to the midpoint of the incurred month at an assumed annual trend rate and applying an additional factor to account for the seasonality of claim costs and the differing number of working days between months. The base period is chosen by selecting a group (usually 12) of recent consecutive months for which the lag completion method provides reasonable results.

The lag completion and projection methods are combined to produce the final incurred claim estimate. Final incurred claim estimates are calculated as a weighted average of these two methods. Because of the amount of claim runout available in the encounters, no weight is placed on the projection method results.

Exhibit N provides additional detail on the calculation of the IBNR adjustments applied to each MCO's CY 2023 experience data. This exhibit includes CY 2023 provider services paid through February 2024, estimated incurred claims and outstanding liability, and the implied IBNR adjustment factor for each incurred month. Table 3 below shows the cumulative IBNR adjustment applied to the CY 2023 experience data. While our IBNR calculation accounts for outstanding provider service costs, in practice the adjustment factor is applied to both provider service costs and case management; as such, the adjustment factors shown in Table 3 are slightly dampened from those underlying Exhibit N to account for the proportion of base period experience attributable to case management to avoid double counting.

Because of the delayed provider payment patterns in recent time periods for institutional services that we do not expect to extend into the future, we relied on the earlier historical completion factors to complete the CY 2023 institutional claims. For all other service categories, we relied on CY 2022 and CY 2023 experience data.

MCO	IBNR Factor
CCI	1.0069
Inclusa	1.0089
LCI	1.0108
MCW	1.0123

STEP 3: CALCULATE MCO / GSR SPECIFIC RISK ADJUSTED BASE RATE USING MAY 2024 ENROLLMENT AND THE FUNCTIONAL STATUS ACUITY MODEL RELATIVITIES

For CY 2025 rate setting, Milliman developed the NH LOC regression models using individuals' functional statuses to predict costs from MCO-reported experience for CY 2022 and CY 2023. This model is a budget neutral risk adjustment model which better reflects the acuity of the population covered under each MCO / GSR relative to the total base data cohort. We used two years of combined Family Care and Family Care Partnership data in order to improve the credibility and stability of the models. We developed risk weights for each of the three target groups independently using the corresponding population's functional screen, claim, and eligibility data. Wisconsin's LTCFS system provided the member level detail underlying each model.

The attached Exhibits C1 through C3 show the NH LOC functional status acuity models for the DD, PD, and FE populations, respectively. The estimated impact on the cost for each variable is shown, along with its significance (i.e., *p*-value), relative contribution in explaining the variation (i.e., Incremental Partial R²), and the proportion of the population with the characteristic.

Table 4 below provides a high-level comparison between the CY 2024 and CY 2025 models for each target group:

Table 4 Wisconsin Department of Health Services Family Care Program Comparison of CY 2024 and CY 2025 Functional Status Models Nursing Home Level of Care			
	Developmentally Disabled	Physically Disabled	Frail Elderly
CY 2025 R ²	43.5%	42.5%	32.5%
CY 2024 R ²	43.7%	43.0%	34.0%
R ² Percentage Change	-0.2%	-0.5%	-1.6%

The “Proportion with Variable” statistics shown in Exhibit C represent the proportion of the base cohort target group population identified with each variable used in the regression model. This is identified directly from a review of an individual’s functional screen. It is calculated as “Number of individuals with condition” divided by “Number of individuals in the target group base cohort.”

The “Statewide Estimate” in Exhibit C represents the estimated incremental dollar cost associated with each variable for the entire target group base data cohort. The values are the result of the multivariable linear regression exercise.

The product of the statewide estimate and the proportion with variable equals the “incremental increase” value. The sum of the incremental increase values equals the total PMPM target group base data cohort cost. For example, the sum of the incremental increase values on Exhibit C1 is \$4,572.13, which is equal to the completed DD base data cost shown on Exhibit B.

Exhibits D1A, D2A, and D3A develop the restated base period costs for each MCO / GSR combination, as modeled by the functional status acuity model. The acuity model is normalized to be budget neutral across all base data GSRs. Therefore, the CY 2023 costs for each target population base data cohort are unaffected in total.

Exhibits D1B, D2B, and D3B develop the final composite risk score as modeled by the functional status acuity model using the May 2024 Family Care NH LOC population enrollment. For credibility purposes, each MCO / GSR / target group combination with fewer than 100 members enrolled in May 2024 will use a blend of the MCO-specific regression results and the regression results for the entire GSR / target group combination. We calculate the credibility-adjusted regression result using the following formulas:

$$\text{Adjusted Regression Result} = \text{Credibility}\% \times \text{MCO / GSR / TG Risk Score} + (1-\text{Credibility}\%) \times \text{GSR / TG Risk Score}$$

$$\text{Credibility}\% = \text{MIN} \left[\sqrt{\frac{\text{May Enrollment}}{100}}, 100\% \right]$$

MCOs with 100 members or more enrolled in a particular GSR and target group in May 2024 are considered fully credible.

In order to phase in changes to individual MCO revenues associated with changes in member assessment protocols and other potential changes, the bottom lines of Exhibits D1B, D2B, and D3B limit the preliminary CY 2025 risk scores to a 2.0% increase or decrease from CY 2024 rates for each MCO and target group combination. We apply a factor to risk scores calculated from May 2024 member screens on the MCO and target group basis to limit this risk score change between years and then re-normalize the risk scores on the projected CY 2025 enrollment.

STEP 4: APPLY ADJUSTMENTS TO THE RISK ADJUSTED BASE RATE TO PROJECT CY 2025 SERVICE COSTS

In this step, we apply adjustment factors to reflect differences between the base period encounter data and the projected CY 2025 Family Care program contract period service costs. Each adjustment factor is explained in detail below and shown in Exhibit E. Services previously available under other waiver service categories (CIE Exploration, Health and Wellness Services, and Remote Monitoring and Support) will be separate waiver categories in rate year 2025.

Exhibit E also shows adjusted and trended values for each target group and in total.

Service Cost Trend from CY 2023 to CY 2025

We used service cost trend rates to project the CY 2023 baseline cost data to the CY 2025 contract period, to reflect changes in provider payment levels and changes in average service utilization and mix. This requires application of 24 months of trend from the midpoint of the baseline cost period to the contract period.

To assist in developing these trend rate projections, we analyzed monthly Family Care MCO encounter data from CY 2021 through 2023 encounter data, in several ways using data consistent with the MCO / GSR combinations included in the base data cohort.

To ensure we are not double counting any program change adjustments in trends, we have repriced all claims to a December 2023 level to account for the following programmatic changes already reflected in rates:

- CY 2021 to CY 2023 FFS nursing home rate changes
- Personal Care FFS rate changes
- 2021 HCBS Increase
- 2022 ARPA Increase
- 2022 Budget Increases

All trends described below are inclusive of this claim repricing.

We excluded GSR 12 experience from the trend analysis, since we know that MCOs performed significant re-contracting with GSR 12 providers during portions of the trend analysis period. Including this experience would artificially include downward pressure on trends that we do not expect to continue past CY 2022.

Exhibit O summarizes the results of our CY 2021 through 2023 trend analysis. Based on this analysis, we selected trends of 2.3%, 3.4%, and 3.1% for the DD, PD, and FE target groups, respectively.

Table 5 illustrates the service cost trend values implemented for the CY 2025 rate development. Our trend assumption is inclusive of both utilization and unit cost. Table 5 represents an approximate split between utilization and unit cost trends for each target group. Based on discussions between Milliman, DHS, and MCOs, we determined that a unit cost trend of 2.0% is a reasonable estimate for historical and expected changes in provider reimbursement rates in absence of other DHS-mandated reimbursement changes.

Table 5 Wisconsin Department of Health Services Family Care Program Annual Trend Rates by Target Group – CY 2023 to CY 2025			
Target Group	Utilization Trend	Unit Cost Trend	PMPM Trend
Developmentally Disabled	0.26%	2.0%	2.26%
Physically Disabled	1.39%	2.0%	3.42%
Frail Elderly	1.04%	2.0%	3.06%

Acuity Trend from CY 2023 to CY 2025

In addition to the above service cost trends, which determine historical cost increases on a risk-neutral basis, we also apply acuity trends to CY 2023 experience to reflect expected population acuity changes from CY 2023 to CY 2025.

To develop these acuity trends, we analyzed annual risk scores from CY 2021 through 2023 for each target group independently. We used these risk scores to calculate the annual trend from CY 2021 through 2023 as shown in Exhibit O. The selected annual trends, shown in Table 6 below, will be used to acuity trend CY 2023 to CY 2025.

Table 6 Wisconsin Department of Health Services Family Care Program Annual Acuity Trend Rates by Target Group	
Target Group	Annual Acuity Trend
Developmentally Disabled	2.40%
Physically Disabled	0.00%
Frail Elderly	0.00%

Because the service cost trends in the previous section are net of changes in member acuity, there is no double-counting between the service cost and acuity trends.

Geographic Adjustment

The functional status acuity model does not include a consideration for the difference in service costs associated with providing care in different regions of the state. Therefore, we developed geographic factors based on an analysis of CY 2021, 2022, and 2023 plan performance relative to the costs projected using the regression model and rate setting assumptions. The methodology to calculate the geographic factors is as follows:

1. We summarize actual experience by MCO / GSR combination using MCO encounter data for each CY 2021, 2022, and 2023. The following adjustments are made to MCO encounter data, consistent with their treatment in rate development:
 - a. Services covered outside of the capitation rate are excluded.
 - b. Case management expenses, which are historically underreported in the MCO encounter data, are adjusted to match the values reported in the MCO's financial data.
 - c. An adjustment is made to the reported amounts to reflect our estimate of incurred but not reported (IBNR) claims.
 - d. Experience for GSRs 1 and 7 are combined consistent with CY 2023 regional definitions. Both GSRs are aggregated within Super Region 1 (as described below), so results would remain unchanged whether we combine or segregate these GSRs for this analysis.
 - e. Experience for GSRs 5, 12, and 14 are separated consistent with CY 2023 regional definitions. These GSRs will be combined into a single GSR (GSR 5) for CY 2025 rates.
2. We aligned the regression models used for each year of the actual to expected analysis, such that we did not require any trend assumptions for our calculations. For example, the CY 2021 analysis used the regression model developed for CY 2023 rates and calibrated to CY 2021 data. We make no adjustment to the projected costs for geographical wage differences by GSR since the intention of these analyses is to identify geographical differences by GSR.
3. We normalized the actual to expected results such that within each given year of data used for the geographic factor analysis, all base data GSRs aggregate to a 1.0 actual to expected ratio.

4. We review the actual and projected costs for each MCO / GSR combination across all three years to identify any anomalous results that may have a material impact on the final geographic adjustment factors. The preliminary geographic adjustment factor is calculated as the average of three years of the ratios of actual and expected costs weighted 1/6, 2/6, and 3/6 from the oldest to the newest year. The projected costs serve as a form of “risk adjustment” to account for differences in target group, member acuity and other issues between GSRs that are already accounted for in MCO payment and should not be part of the geographic factor calculations. Exhibit P shows this calculation for each GSR.
5. As part of capitation rate development, we scale the preliminary geographic factors to maintain budget neutrality for each target group; thus, the geographic normalization factor applied to each target group within a GSR will differ. Table 7 below shows the normalization factor applied to normalize the preliminary geographic adjustment factors by target group.

Table 7 Wisconsin Department of Health Services Family Care Program Geographic Factor Normalization by Target Group	
Target Group	Normalization Factor
Developmentally Disabled	1.0044
Physically Disabled	0.9937
Frail Elderly	0.9986

To increase the credibility of this calculation and to limit the maximal market share achieved by a single MCO, the geographic factors for certain GSRs are calculated as the combination of results across several GSRs. These combinations, referred to as “Super Regions,” are defined in Exhibit P.

Nursing Home Rate Adjustment

The Wisconsin biennial budgets direct DHS to provide a 23.4% increase for SFY 2024 and the NH payment standard requires an additional 10.2% increase for SFY 2025. Based on guidance from DHS, we assume an additional 3.0% increase for SFY 2026.

Additionally, DHS included an additional \$5.2 million in funding for nursing homes in CY 2025 to managed care programs related to nursing home per diem increases, incremental to the rate increases outlined above. We allocated this funding across programs proportional to the programs’ nursing home expenditures.

Table 8a summarizes these rate increases and the percentage applied to adjust CY 2023 base data to a CY 2025 basis. We applied an adjustment specific to each target group and GSR based on the proportion of service costs for nursing home services in CY 2023. Table 8b shows the calculation of this adjustment, which is included in Exhibit E.

Table 8a Wisconsin Department of Health Services Nursing Home Rate Adjustment		
Year	Rate Increase	Percent of Increase Applied
SFY 2024	23.4%	50%
SFY 2025	10.2%	100%
SFY 2026	3.0%	50%

Table 8b
Wisconsin Department of Health Services
Family Care Program
Nursing Home Rate Adjustment

GSR	Percentage of Nursing Home Cost in CY 2023			Adjustment Factor		
	DD	PD	FE	DD	PD	FE
GSR 1	5.0%	13.3%	25.0%	1.0112	1.0301	1.0568
GSR 2	7.3%	13.1%	33.7%	1.0164	1.0296	1.0769
GSR 3	7.7%	15.9%	32.4%	1.0173	1.0360	1.0739
GSR 4	3.2%	10.8%	14.4%	1.0072	1.0244	1.0325
GSR 5	5.0%	17.1%	23.2%	1.0113	1.0387	1.0528
GSR 6	6.3%	17.0%	28.4%	1.0143	1.0386	1.0647
GSR 8	12.2%	14.7%	31.3%	1.0275	1.0334	1.0715
GSR 9	5.6%	22.2%	28.4%	1.0127	1.0504	1.0646
GSR 10	4.8%	19.3%	23.6%	1.0108	1.0437	1.0536
GSR 11	6.0%	18.0%	25.0%	1.0135	1.0407	1.0570
GSR 13	3.9%	15.7%	20.8%	1.0087	1.0354	1.0471

Personal Care Rate Adjustment

DHS increased fee-for-service personal care rates \$23.44 per hour in CY 2023 to \$24.51 per hour in CY 2025. Personal care costs represented between 0.10% and 0.37% of base period costs across the three target groups. Applying these rate increases to these portions of the cost results in adjustments of 0.005%, 0.017%, and 0.005% for the DD, PD, and FE target groups, respectively. This adjustment is made in Exhibit E.

HCBS Minimum Payment Rate

DHS has instituted a minimum payment rate for residential and supportive home care services effective October 1, 2024. The purpose of the minimum payment rates is to establish a “floor” that supports a minimum payment amount for residential and supportive home care services that is consistent with efficiency, economy, quality of care, and access to care. The fiscal impact of the minimum rate requirement is \$70.2 million for 2024, which was calculated from CY 2022 encounter data and only applied for October through December 2024. We updated the fiscal impact analysis using CY 2023 encounter data and the same minimum fee schedule for CY 2025 rate development. The projected impact for CY 2025 is \$259.4 million, of which \$246.6 million is for Family Care NH LOC. Please see the January 30, 2024 report, attached as Appendix E, with documentation around the development of the minimum rates and the related fiscal impact. DHS policy will be adjusted to apply the same minimum rates to all residential encounters, including those days when members attend Day Programs. As a result, the Residential Day Programs Adjustment was removed from the fiscal impact shown in Figure 2 of Appendix E.

STEP 5: ADD ALLOWANCE FOR NON-BENEFIT EXPENSES

In this step we develop the non-benefit cost allowance for the Nursing Home-eligible population. Non-benefit expense loads are shown in Exhibit F.

Administrative Costs

In order to develop administrative costs, DHS and Milliman reviewed program experience from plan reported financial summaries for CY 2023. We set overall CY 2025 administrative costs based on the CY 2023 administrative cost PMPM level with two years of 4.3% annual trend applied, which is comparable to recent Employment Cost Index calculations published by the Bureau of Labor Statistics.

We make an adjustment to account for the size of the MCO to ensure sufficient funding of the required administrative infrastructure costs to operate in the program which do not vary by the member months of the MCO. MCOs with enrollment less than 100,000 member months are increased an additional 20%, based on a review of the historical administrative cost relativities, emerging experience and known staffing increases needed to meet the contractual requirements of the Family Care contract. Since larger MCOs spread fixed costs across more member months, this adjustment ensures sufficient funding for smaller MCOs when the total administrative funding is calculated by the weighted average PMPM.

This results in an overall CY 2025 administrative load of \$140.59 PMPM for Family Care.

OCI Adjustment

DHS is providing a modest amount of funding (\$0.27 PMPM) to be used as a provision for the Office of the Commissioner of Insurance's (OCI's) financial oversight function. We derived this amount by dividing the total contracted amount (\$69,400) by the total NH LOC projected enrollment in CY 2025 for LCI and CCI. By contract, these MCOs will be required to use 100% of these funds to pay for these OCI services, as a cost of doing business. Other participating MCOs have had changes in their ownership structure and will be monitored as part of a larger HMO structure under a different program.

Targeted Risk Margin / Contribution to Reserves

We include an explicit 2.0% targeted margin to account for risk margin and cost of capital. We believe that this margin is appropriate given the predictability of expenses under the program, the existence of a permanent risk corridor mechanism, and margins included for similar programs nationally. All of the P4P withhold is expected to be returned to MCOs as described in Section V of this report.

STEP 6: BLEND NET CAPITATION RATE BY TARGET GROUP

In this step we blend the CY 2025 MCO / GSR capitation rates for each target group based on the projected CY 2025 target group membership. The blended capitation rates are reflected in the last section of Exhibits F and G. These blended rates are illustrative only, since the capitation payment system pays separate capitation rates for each target group.

IV. NON-NURSING HOME LEVEL OF CARE METHODOLOGY OVERVIEW

This section of the report describes the CY 2025 Family Care capitation rate methodology for the Non-Nursing Home Level of Care (Non-NH LOC) population.

The methodology used to project the MCO encounter data used in the calculation of the capitation rates can be outlined in the following steps:

1. Extract and summarize CY 2023 MCO encounter base experience data for the Non-NH LOC population by target group.
2. Apply IBNR and in-lieu-of services adjustments to establish base period cost.
3. Apply adjustments to the base experience data to project CY 2025 services costs for each MCO / GSR.
4. Add allowance for non-benefit costs.

Each of the above steps is described in detail below.

STEP 1: EXTRACT AND SUMMARIZE ENCOUNTER BASE EXPERIENCE DATA

In this step, we summarize the MCO encounter experience for CY 2023 by MCO / GSR and service category for the Non-NH LOC populations enrolled in the Family Care program.

DHS and Milliman performed a substantial review of the CY 2023 experience. CY 2023 experience has rebounded to pre-pandemic levels. We used the same process to summarize and validate the MCO encounter data for the Non-NH LOC population as the one described in Section III of this report for the NH LOC population. The CY 2025 Non-NH LOC rate methodology also relies on CY 2023 MCO encounter data for the same MCO / GSR combinations.

The base data is adjusted for encounters rejected for EVV but expected to be covered in 2025.

Identical processes are used to assign target group and reconcile case management expenses as used for the NH LOC population.

STEP 2: APPLY IBNR AND / IN LIEU OF SERVICES ADJUSTMENT

In this step we apply an adjustment to the base period costs to account for outstanding service cost liability for each MCO and GSR combination using the same IBNR factors shown in Table 3, which were calculated using a combination of NH and Non-NH LOC experience due to the non-credible size of the Non-NH LOC experience.

Exhibit I shows adjusted values for each target group.

Non-Covered Services Adjustment

MCOs are allowed to provide LTC waiver services under Family Care that are not explicitly covered for Non-NH LOC beneficiaries, most often in lieu of a covered service. The amount of in-lieu-of services included in rate development is approximately 0.03% of total Family Care base period costs. Furthermore, the expectation is no additional in-lieu-of services will be introduced and they will inform a similar percentage of future service costs in the CY 2025 projection period.

As part of the capitation rate development process, the encounter data is adjusted to remove the portion of the cost of in-lieu-of services that exceeds the cost of the corresponding state plan service. The two most significant covered services that are substituted for are personal care and state plan transportation services. In addition, we excluded costs for certain non-covered services because they do not have a comparable covered service under Family Care. According to regulation, non-covered services that do not have a comparable covered service cannot be included in the capitation rate development. These services include supported employment, certain institutional services, and other services.

Table 9 below shows a summary of the amounts for non-covered services we exclude for the Non-NH LOC base data cohort.

Table 9 Wisconsin Department of Health Services Family Care Program Excluded Amounts for Non-Covered Services	
MCO	Amount
CCI	\$4,760
Inclusa	\$400
LCI	\$74
MCW	\$1,885
Total	\$7,119

In total, we excluded \$7,119 (0.12%) from the Non-NH LOC base data underlying CY 2025 capitation rate development for costs related to non-covered services that are not cost effective in comparison with their corresponding covered service.

Exhibit I shows the summarized CY 2023 MCO encounter base experience data by target group net of the non-covered services exclusion.

STEP 3: APPLY ADJUSTMENTS TO THE BASE EXPERIENCE DATA TO PROJECT CY 2025 SERVICE COSTS FOR EACH MCO / GSR

In this step we apply adjustments to the base period costs to project costs from the CY 2023 base period to the CY 2025 contract period. These adjustments are shown in Exhibit J.

Services previously available under other waiver service categories (CIE Exploration, Health and Wellness Services, and Remote Monitoring and Support) will be separate waiver categories in rate year 2025.

CY 2023 to CY 2025 Trend Adjustment

Service cost and acuity changes are applied for 24 months to project the CY 2023 base data to the CY 2025 contract period. Service cost and acuity trends used for the Non-NH LOC population are consistent with those shown in Tables 5 and 6, respectively, for the NH LOC population. The same trend values as the NH LOC population are used because of the non-credible size of the Non-NH LOC experience. Given the significant similarity of covered populations, benefits, provider reimbursement, and geography between the NH and Non-NH LOC populations, we believe the NH LOC trend rates are the most appropriate to use for the Non-NH LOC population.

Geographic Adjustment

Since the base cost data represents an average program cost, an adjustment for each MCO / GSR is needed to reflect the difference in service costs associated with providing care in different regions of the Family Care service area.

We used the same geographic adjustment factors as for the NH LOC population and documented in Exhibit P of this report because of the non-credible size of the Non-NH LOC experience. Given the significant similarity of covered populations, benefits, provider reimbursement, and geography between the NH and Non-NH LOC populations, we believe the NH LOC wage factors are the most appropriate to use for the Non-NH LOC population. The geographic factors are normalized to 1.0 for the base cohort.

Nursing Home Rate Adjustment

The Wisconsin biennial budgets direct DHS to provide a 23.4% increase for SFY 2024 and the NH payment standard requires an additional 10.2% increase for SFY 2025. Based on guidance from DHS, we assume an additional 3.0% increase for SFY 2026.

Additionally, DHS included an additional \$5.2 million in funding for nursing homes in CY 2025 to managed care programs related to nursing home per diem increases, incremental to the rate increases outlined above. We allocated this funding across programs proportional to the programs' nursing home expenditures.

We applied an adjustment specific to each target group and GSR based on the proportion of service costs for nursing home services in CY 2023. This adjustment is made in Exhibit J.

Personal Care Rate Adjustment

DHS increased fee-for-service personal care rates \$23.44 per hour in CY 2023 to \$24.51 per hour in CY 2025. There were no personal care claims in the base period for the Non-NH LOC population. Applying these rate increases to the portion of the cost results in an adjustment of 0.00%. This adjustment is made in Exhibit J.

HCBS Minimum Payment Rate

DHS has instituted a minimum payment rate for residential and supportive home care services effective October 1, 2024. The purpose of the minimum payment rates is to establish a "floor" that supports a minimum payment amount for residential and supportive home care services that is consistent with efficiency, economy, quality of care, and access to care. The fiscal impact of the minimum rate requirement is \$70.2 million for 2024, which was calculated from CY 2022 encounter data and only applied for October through December 2024. We updated the fiscal impact analysis using CY 2023 encounter data and the same minimum fee schedule for CY 2025 rate development. The projected impact for CY 2025 is \$259.4 million, of which \$33,000 is for Family Care Non-NH LOC. Please see the January 30, 2024 report, attached as Appendix E, with documentation around the development of the minimum rates and the related fiscal impact. DHS policy will be adjusted to apply the same minimum rates to all residential encounters, including those days when members attend Day Programs. As a result, the Residential Day Programs Adjustment was removed from the fiscal impact shown in Figure 2 of Appendix E.

STEP 4: ADD ALLOWANCE FOR NON-BENEFIT COSTS

In this step we develop the non-benefit cost allowance for the Non-NH LOC eligible population. Non-benefit expense loads and resulting capitation rates are shown in Exhibit K.

It is our understanding that the Non-NH LOC and NH LOC populations are administered similarly by the MCOs. In addition, the revenue associated with the Non-NH program is small enough that we do not believe it would be possible to develop a credible, standalone administrative cost projection.

Therefore, the allowance for Non-NH LOC administrative cost allowance PMPM for each MCO is set equal to approximately 17% of the MCO's NH LOC administrative cost allowance, based on the ratio of the monthly CY 2023 NH LOC and Non-NH LOC service costs. See Section III of this report for details of the development of the allowance for administrative costs for the NH LOC population.

We include an explicit 2.0% targeted margin to account for risk margin and cost of capital. We believe that this margin is appropriate given the predictability of expenses under the program, existence of a permanent risk corridor program, and margins included for similar programs nationally. All of the P4P withhold is expected to be returned to MCOs.

Exhibit L shows the monthly capitation rates.

V. OTHER RATE CONSIDERATIONS

All actual and potential adjustments outlined in this section have been developed in accordance with generally accepted actuarial principles and practices.

RISK CORRIDOR

For CY 2025 Family Care will continue to have a risk corridor mechanism to mitigate the uncertainty associated with the unique ownership and operational circumstances that some MCOs in this program face. The risk corridor will address variances in costs for all services other than care management. The pricing assumptions in this report create an average target risk corridor loss ratio of 86.1%, excluding care management, based on the following components:

- Average administrative allowance of 2.8%
- Average care management load of 9.1%
 - DD target group – 7.3%
 - PD target group – 13.1%
 - FE target group – 10.2%
 - Non-NH LOC – 57.5%
- Margin of 2.0%

MCO / GSR-specific administrative allowance and care management loads will be developed to match actual target group mix, LOC mix and pricing assumptions made in rate development. Note, the actual rate development MLR including covered care management services is well above the 85% minimum required under federal regulation.

DHS and each MCO will share the marginal financial risk of actual results above or below the target risk corridor loss ratio as shown in the table below:

Variance from Target	Average Loss Ratio Claims Corridor	MCO Share of Gain / Loss in Corridor	DHS Share of Gain / Loss in Corridor
< -6.0%	< 80.1%	0%	100%
-6.0% to -2.0%	80.1% to 84.1%	50%	50%
-2.0% to +2.0%	84.1% to 88.1%	100%	0%
+2.0% to +6.0%	88.1% to 92.1%	50%	50%
> +6.0%	> 92.1%	0%	100%

The risk corridor settlement will occur after the CY 2025 rate year has ended, and enough time has passed to collect and validate CY 2025 encounter data and financial data with sufficient run-out. We anticipate performing an initial settlement no earlier than four months after the rate year has ended and a final settlement no earlier than nine months after the rate year has ended.

Only medical benefit services costs, as defined in the contract and this report, other than care coordination, will be included in the numerator of the loss ratio calculation for the risk corridor program. Care coordination, quality improvement, and other non-medical benefit service costs will not be included in the numerator of the loss ratio calculation, consistent with the development of the target risk corridor target loss ratio. All capitation revenue, assuming 100% return of withhold, will be included in the denominator of the loss ratio calculation other than any incentive payments earned.

Consistent with contract expectations, DHS expects reimbursement made for medical benefit services should be at market-based levels and should incentivize efficient and high-quality care. As such, DHS reserves the right to review encounters and other information associated with such payments and adjust the risk corridor calculation as necessary to reflect those expectations.

WITHHOLDS AND INCENTIVES

The total value of incentives outlined in this section will not exceed 5% of total capitation received by any MCO.

Pay for Performance Withhold and Incentive

Beginning in CY 2018, DHS implemented pay for performance (P4P) in the Family Care program. For CY 2025, DHS will withhold 0.5% of each MCO's gross capitation rate. MCOs will be allowed to earn back the withhold based on their performance on the following metrics:

1. MCOs that complete an interest inventory for Community Connections (CC) with cohort sampling at 90% (+/- 5%) confidence level will earn back 0.10% withheld from the capitation. If the MCO meets the interest inventory standard, it is eligible to earn back 0.10% withheld from the capitation for having CC outcome and completed approved activity for 90% of assessed members that are interested or may be interested. MCOs that complete quarterly data reporting on key performance indicators and summarizing study / act phases of Plan-Do-Study-Act will earn back 0.05% withheld from the capitation.

If the MCO meets all three of the withhold standards, it is eligible to receive up to an additional 0.20% incentive for completing stakeholder and community related activities. The MCO will receive 0.10% for quarterly Stakeholder Advisory Council Committee and one residential provider meeting, 0.05% for quarterly local provider stakeholder collaboration committee meetings in each GSR, and 0.05% for Community Readiness assessment in each GSR.

2. MCOs that maintain between 80% and 89% of their current Competitive Integrated Employment (CIE) rate will earn back 0.125% withheld from the capitation. MCOs that maintain between 90% and 100% of their current CIE rate will earn back 0.25% withheld from the capitation.

MCOs will earn an incentive of 0.05% of the capitation if they increase the number of members in CIE by between 2.0% and 3.9% and an incentive of 0.1% if they increase the number of members by at least 4.0%.

Based on past performance and expectations under measure revisions, DHS and Milliman estimate that all of the 0.5% withhold will be returned to MCOs under the pay for performance terms, assuming no material changes to the program are made. These capitation rates are certified as being actuarially sound assuming that all of the 0.5% withhold is returned.

Transition Incentive Payment

DHS may provide a one-time incentive payment to the MCO for each MCO member who is relocated from an institution into a community setting consistent with federal Money Follows the Person (MFP) guidelines, contingent on the availability of federal MFP funding.

ALTERNATIVE PAYMENT ARRANGEMENTS

The following describes alternative payment arrangements in the Family Care program. Additional documentation of these arrangements is provided in our response to the CMS Medicaid Managed Care Rate Development Guide in Appendix D.

We certify that the Family Care capitation rates, including these alternative payment arrangements, are actuarially sound.

Maximum Provider Fee Schedule

Per the contract between DHS and the participating MCOs, State Plan services provided under the Family Care benefit package are subject to a maximum fee schedule established by the state. The use of this maximum fee schedule promotes efficient and cost-effective care by controlling the growth in Medicaid expenditures. Most providers of State Plan services are subject to the maximum fee schedule, though MCOs have the ability to exceed the limit when necessary for executing a reimbursement contract. This arrangement does not include a separately distributed directed payment. DHS will submit a §438.6(c) pre-print proposal for an alternative payment arrangement to implement the maximum fee schedule for CMS approval. We built the maximum fee schedule into rates in a manner consistent with the §438.6(c) payment arrangement.

We developed the base data discussed in Sections III and IV of this report using historical Family Care experience, which reflects the long-standing maximum fee schedule arrangement and approved exceptions. We expect no material change to the total value of exceptions made over the maximum fee schedule, which was \$0 for 2023 base data. We used this base data to develop rates for all regions, including expansion regions. No further adjustment to provider reimbursement levels are made as part of rate development.

Direct Care Workforce

Wisconsin Statute §49.45(47m) directs DHS to make payments for CY 2025 services to Family Care MCOs to distribute to direct care workforce (DCW) providers. The 2023-2025 Wisconsin biennial budget includes additional funding for these providers and the estimated total for CY 2025 is \$151.5 million of which \$142.2 million is estimated to be allocated to Family Care. **This estimate is preliminary and expected to be updated in a future certification.** These payments will be made retrospectively after the conclusion of the rate year and are intended to be consistent with an §438.6(c) payment arrangement which has not yet been submitted. Providers of the following services are eligible for these payments:

- Providers of adult day care services
- Daily living skills training
- Habilitation services
- Residential care
- Respite care provided outside of a nursing home
- Supported employment
- Prevocational employment
- Vocational futures planning
- Supportive home care

Exhibit Q includes a preliminary estimate of the allocation of total DCW funding for each MCO / GSR combination. We allocated the total funding between the Family Care NH LOC, Family Care Non-NH LOC and FCP programs and between MCO / GSR combinations within each program using actual CY 2023 MCO expenditures. We then developed PMPM values using projected CY 2025 MCO / GSR enrollment.

HCBS Provider Rate Increase – Effective June 2021

Effective June 1, 2021, DHS is requiring MCOs participating in Family Care to increase provider reimbursement rates for certain home and community-based services. This increase is 4.24% for eligible providers. No explicit adjustment was necessary as part of this certification since our base data reflects this increase. We certify that these capitation rates are actuarially sound and is intended to be consistent with a forthcoming §438.6(c) payment arrangement. This increase is in addition to the funding provided to providers through the DCW arrangement described previously.

ARPA Provider Rate Increase – Effective January 2022

Effective January 1, 2022, DHS is requiring MCOs participating in Family Care to increase provider reimbursement rates by 5.0% for certain home and community-based services. No explicit adjustment was necessary as part of this certification since our base data reflects this increase. We certify that these capitation rates are actuarially sound and is intended to be consistent with a forthcoming §438.6(c) payment arrangement. This increase is in addition to the funding provided to providers through the DCW arrangement described previously.

HCBS Minimum Payment Rate

DHS has instituted a minimum payment rate for residential and supportive home care services effective October 1, 2024. The purpose of the minimum payment rates is to establish a “floor” that supports a minimum payment amount for residential and supportive home care services that is consistent with efficiency, economy, quality of care, and access to care. We certify that these capitation rates are actuarially sound and are intended to be consistent with a forthcoming §438.6(c) payment arrangement, which has not yet been submitted.

We make an adjustment to account for the difference in reimbursement rates in our base data relative to these minimum payment rates in Exhibits E and J. See Sections III and IV and Appendix E for details surrounding this adjustment.

EXHIBITS A through Q
(Provided in Excel Format Only)

State of Wisconsin Department of Health Services
Calendar Year 2025 Capitation Rate Development Family Care Program

November 25, 2024

This report assumes that the reader is familiar with the State of Wisconsin's Medicaid program, its benefits, and rate setting principles. The report was prepared solely to provide assistance to DHS to set CY 2025 capitation rates for the Family Care program. It may not be appropriate for other purposes. Milliman does not intend to benefit, and assumes no duty or liability to, other parties who receive this work. This material should only be reviewed in its entirety.

APPENDIX A

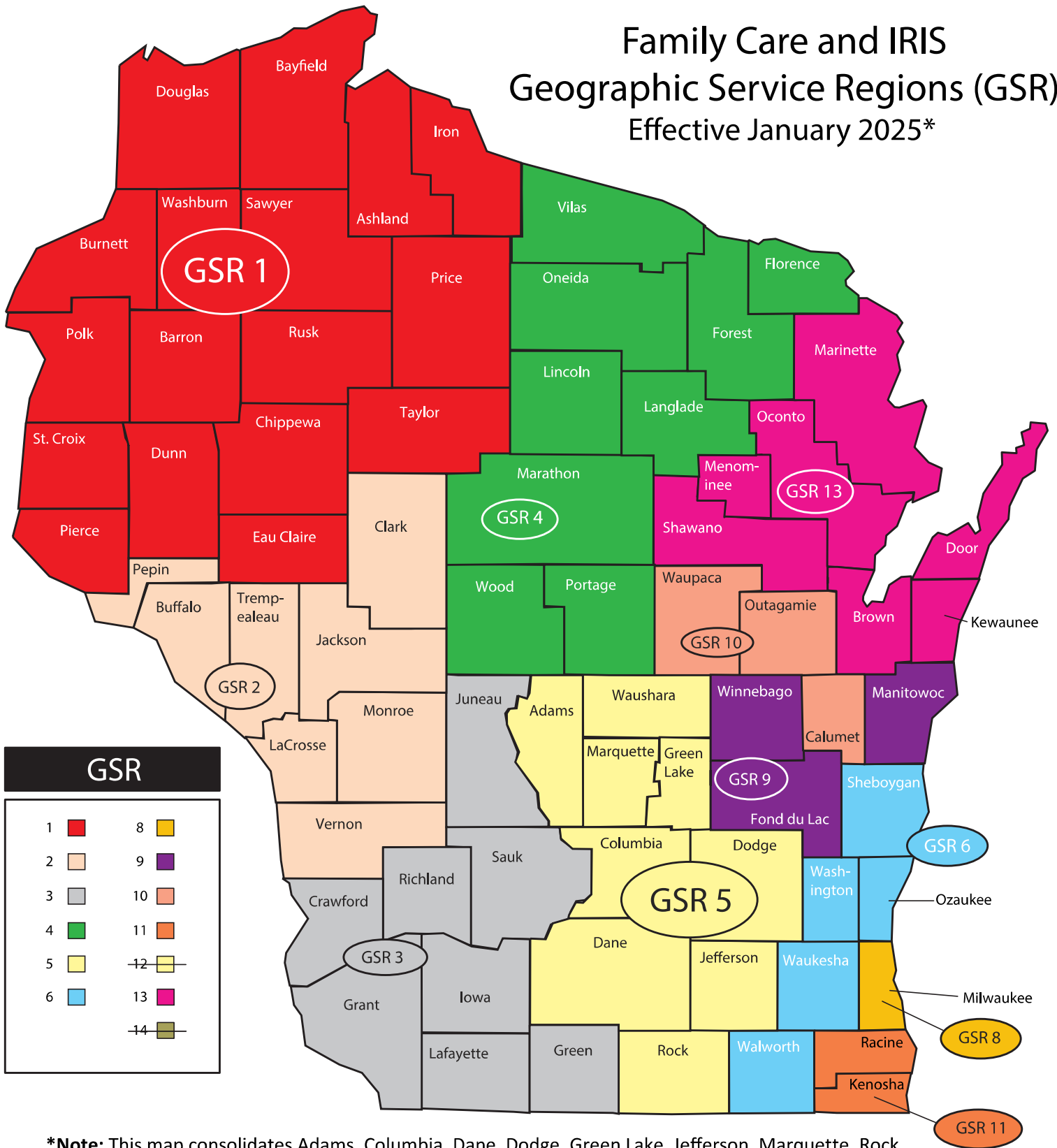
Geographical Service Region Map

State of Wisconsin Department of Health Services
Calendar Year 2025 Capitation Rate Development Family Care Program

November 25, 2024

This report assumes that the reader is familiar with the State of Wisconsin's Medicaid program, its benefits, and rate setting principles. The report was prepared solely to provide assistance to DHS to set CY 2025 capitation rates for the Family Care program. It may not be appropriate for other purposes. Milliman does not intend to benefit, and assumes no duty or liability to, other parties who receive this work. This material should only be reviewed in its entirety.

Family Care and IRIS Geographic Service Regions (GSR) Effective January 2025*



***Note:** This map consolidates Adams, Columbia, Dane, Dodge, Green Lake, Jefferson, Marquette, Rock, and Waushara counties (formerly GSRs 5, 12, and 14) into new GSR 5.

APPENDIX B

Actuarial Certification of CY 2025 Wisconsin Family Care Capitation Rates

State of Wisconsin Department of Health Services
Calendar Year 2025 Capitation Rate Development Family Care Program

November 25, 2024

This report assumes that the reader is familiar with the State of Wisconsin's Medicaid program, its benefits, and rate setting principles. The report was prepared solely to provide assistance to DHS to set CY 2025 capitation rates for the Family Care program. It may not be appropriate for other purposes. Milliman does not intend to benefit, and assumes no duty or liability to, other parties who receive this work. This material should only be reviewed in its entirety.



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November 25, 2024

**Wisconsin Department of Health Services
Capitated Contracts Ratesetting
Actuarial Certification
CY 2025 Family Care Program Capitation Rates**

I, Michael Cook, am associated with the firm of Milliman, Inc., am a member of the American Academy of Actuaries, and meet its Qualification Standards for Statements of Actuarial Opinion.

I was retained by the Wisconsin Department of Health Services (DHS) to perform an actuarial certification of the Family Care program capitation rates for calendar year (CY) 2025 for filing with the Centers for Medicare and Medicaid Services (CMS).

I reviewed the calculated capitation rates and am familiar with the following regulation and guidance:

- The requirements of 42 CFR §438.3(c), 438.3(e), 438.4, 438.5, 438.6, and 438.7
- CMS “Appendix A, PAHP, PIHP, and MCO Contracts Financial Review Documentation for At-risk Capitated Contracts Ratesetting dated November 10, 2014”
- 2024 to 2025 Medicaid Managed Care Rate Development Guide
- Actuarial Standard of Practice 49

The payment rates, methodology, data, and assumptions used to calculate the January 1, 2025 through December 31, 2025 rates are documented in this report to DHS, of which this certification is a part.

In making my opinion, I relied upon the accuracy of the underlying claims and eligibility data records and other information. The report referenced above includes a description of the data and information upon which I relied. I did not audit the data and calculations, but did review them for reasonableness and consistency and did not find material defects. In other respects, my examination included such review of the underlying assumptions and methods used and such tests of the calculations as I considered necessary.

In my opinion, the payment rates identified above are actuarially sound, as defined in 42 CFR §438.4, including that they:

1. Have been developed in accordance with generally accepted actuarial principles and practices and Actuarial Standards of Practice.
2. Are appropriate for the populations to be covered and the services furnished.
3. Meet the relevant actuarial requirements of 42 CFR §438.4(b).

Actuarial methods, considerations, and analyses used in forming my opinion conform to the appropriate Standards of Practice as promulgated from time-to-time by the Actuarial Standards Board, whose standards form the basis of this Statement of Opinion.

It should be emphasized, that capitation rates are a projection of future costs based on a set of assumptions. Actual costs will be dependent on each contracted managed care organization’s situation and experience. These capitation rates may not be appropriate for all health plans. Any health plan considering participating in the Family Care program should consider their unique circumstances before deciding to contract under these rates.



This Opinion assumes the reader is familiar with the Wisconsin Medicaid program, Family Care programs, and actuarial rating techniques. The Opinion is intended for the State of Wisconsin and the Centers for Medicare and Medicaid Services and should not be relied on by other parties. The reader should be advised by actuaries or other professionals competent in the area of actuarial rate projections of the type in this Opinion, so as to properly interpret the projection results.

A handwritten signature in black ink that reads "Michael Cook". The signature is written in a cursive style and is positioned above a horizontal line.

Michael Cook
Member, American Academy of Actuaries
November 25, 2024



RELIANCE LETTER

November 27, 2024

Michael Cook, FSA, MAAA
Principal and Consulting Actuary
Milliman, Inc.
17335 Golf Parkway, Suite 100
Brookfield, WI 53045

RE: Data Reliance for Actuarial Certification of CY 2025 Family Care, Family Care Partnership, and PACE Capitation Rates

Dear Michael:

I, Krista Willing, Assistant Administrator of System, Fiscal and Operations, Wisconsin Division of Medicaid Services, hereby affirm that the listings and summaries prepared and submitted to Milliman, Inc. for the development of the CY 2025 Family Care, and Family Care Partnership, and PACE capitation rates were prepared under my direction, and to the best of my knowledge and belief are accurate and complete. These listings and summaries include:

1. Health Plan encounter data files containing claims information on capitated plan assignment, detailed service category, target group, geographic indicators, and demographic indicators for calendar years (CYs) 2021 through 2023 for the Family Care, Family Care Partnership, and PACE programs.
2. Fee-for-service, Waitlist, and Waiver data files containing claims information on detailed service category, geographic indicators, and demographic indicators for CYs 2021 through 2023 for the Family Care and Family Care Partnership programs.
3. Long Term Care Functional Screen (LTCFS) data extracts through May 2024 for the Family Care, Family Care Partnership, and PACE programs, and data files containing a list of non-victim incidents by member.
4. Data files containing enrollment information on capitated plan assignment, program and target group, geographic indicators, and demographic indicators (including ventilator-dependent members, tribal members, and other distinguishing characteristics) for CY 2021 through 2023, and January 2024 through May 2024 for the Family Care, Family Care Partnership, and PACE programs.
5. Data file containing IMD claims for Family Care Partnership members.
6. Personal Care Assistance (PCA) fee schedules from CY 2023 through CY 2025, including definitions of covered PCA services.
7. Nursing Home Rate Increases from SFY 2023 to SFY 2025.
8. Data files containing claims and enrollment information for the acute and primary portion of the Family Care Partnership and PACE programs.
9. Data files containing estimated monthly enrollment projections for CY 2025 in total and by health plan, geographic indicator, Medicare status, and target group for the Family Care, Family Care Partnership, and PACE programs.
10. Data dictionary files for the encounter, enrollment, and LTCFS files for the Family Care, Family Care Partnership, and PACE programs, including definitions of low and high activities of daily living, and instrumental activities of daily living, definitions of base and expansion cohorts, data files containing a mapping of functional screen fields to cost weight variables, and data files containing a mapping of services to broad categories of service.
11. Mapping file summarizing the consolidation and expansion of MCO/GSRs for CY 2025 relative to CY

2024.

12. Mapping file summarizing the MCO ID to MCO / GSR crosswalk.
13. CY 2021 through 2023 financials and CY 2019 through CY 2022 IBNR actual to expected analysis for health plans participating in the Family Care, Family Care Partnership, and PACE programs.
14. Information and analysis regarding paid provider unit cost trends.
15. An estimate for expenses related to the Office of the Commissioner of Insurance's (OCI's) financial oversight function.
16. A data file containing lists of allowed and dis-allowed services under managed care and estimates of pharmacy rebates for the Family Care, Family Care Partnership, and PACE programs.
17. A summary of non-covered claims to be reclassified as covered.
18. Information and direction regarding the goals of the PACE rate development.
19. Information regarding the covered services for PACE rate development.
20. Information and direction regarding the HCBS Minimum Payment Rate.
21. Information and direction regarding the Pay for Performance and incentive payment mechanisms for the Family Care and Family Care Partnership programs, including expectations around withhold return.
22. Results of analyses performed by DHS regarding the fiscal impact of legislative and policy changes for the Family Care, Family Care Partnership, and PACE programs.
23. Estimated impacts of legislated increases in FFS reimbursement rates for certain services as part of the 2023-2025 biannual state budget.
24. Information and direction regarding Directed Payments for the Family Care and Family Care Partnership programs, including Maximum Provider Fee Schedule, and Direct Care Workforce.
25. Any other items provided to Milliman to support the 2025 rate development not mentioned above for the Family Care, Family Care Partnership, and PACE programs.

I affirm that the above information and any other related data submitted to Milliman, Inc. are, to the best of my knowledge and belief, accurately stated.

Krista Willing

Name

11/27/2024

Date

APPENDIX C

CMS Rate Setting Checklist Issues

State of Wisconsin Department of Health Services
Calendar Year 2025 Capitation Rate Development Family Care Program

November 25, 2024

This report assumes that the reader is familiar with the State of Wisconsin's Medicaid program, its benefits, and rate setting principles. The report was prepared solely to provide assistance to DHS to set CY 2025 capitation rates for the Family Care program. It may not be appropriate for other purposes. Milliman does not intend to benefit, and assumes no duty or liability to, other parties who receive this work. This material should only be reviewed in its entirety.

APPENDIX C

Rate Setting Checklist

This section of the report lists each item in the November 10, 2014 CMS checklist and discusses how DHS addresses each issue and / or directs the reader to other parts of this report. CMS uses the rate setting checklist to review and approve a state's Medicaid capitation rates.

AA.1.0 – Overview of Rates Being Paid Under the Contract

The calendar year (CY) 2025 managed care organization (MCO) capitation rates are developed using 2023 Wisconsin Medicaid long term care (LTC) MCO encounter data for the MCO eligible population, along with other information. DHS sets rates by MCO and Geographical Service Area (GSR).

Please refer to Sections II through V of this report for background on the program and more details around the rate development.

AA.1.1 – Actuarial Certification

The Actuarial Certification of the CY 2025 capitation rates is included as Appendix B of this report. The CY 2025 Wisconsin LTC Medicaid capitation rates have been developed in accordance with generally accepted actuarial principles and practices and are appropriate for the populations to be covered and the services to be furnished under the contract.

AA.1.2 – Projection of Expenditures

Exhibit M includes a projection of total expenditures and Federal-only expenditures based on actual Projected CY 2025 MCO enrollment and CY 2025 capitation rates. We used a 60.43% FMAP rate to calculate the Federal expenditures.

AA.1.3 – Risk Contracts

The Wisconsin Family Care program meets the criteria of a risk contract.

AA.1.4 – Modifications

The rates documented in this report are the initial capitation rates for the CY 2025 Wisconsin Medicaid LTC managed care contracts.

Note: There is no AA.1.5 on the Rate Setting Checklist

AA.1.6 – Limit on Payment to Other Providers

It is our understanding no payment is made to a provider other than the participating MCOs for services available under the contract.

AA.1.7 – Risk and Profit

The CY 2025 Family Care capitation rates include a targeted margin of 2.0% for risk, profit, and contribution to reserves. We believe that this margin is appropriate given low service cost trends and the predictability of expenses under the program.

AA.1.8 – Family Planning Enhanced Match

DHS does not claim enhanced match for family planning services for the population covered under this program.

AA.1.9 – Indian Health Service (IHS) Facility Enhanced Match

DHS does not claim enhanced match for Indian Health Services for the population covered under this program.

AA.1.10 – Newly Eligible Enhanced Match

The Wisconsin Family Care program does not cover the newly eligible Medicaid population. Therefore, none of the recipients are eligible for the enhanced Federal match under Section 1905(y).

APPENDIX C

Rate Setting Checklist

AA.1.11 – Retroactive Adjustments

The rates documented in this report are the initial capitation rates for the CY 2025 Wisconsin Medicaid LTC managed care contracts and do not contain any retroactive adjustments.

AA.2.0 – Based Only Upon Services Covered Under the State Plan

The CY 2025 rate methodology relies on CY 2023 MCO encounter data as the primary data source. Only State Plan and waiver services that are covered under the Wisconsin Family Care contract or are shown to be cost-effective “in-lieu-of services” have been included in the rate development.

Please refer to the Non-Covered Services portion of Sections III and IV of this report for more details.

AA.2.1 – Provided Under the Contract to Medicaid-Eligible Individuals

The capitation rate development methodology relies on data that includes only those eligible and currently enrolled in the Wisconsin Family Care program and does not include experience for individuals not eligible to enroll in the program.

AA.2.2 – Data Sources

The CY 2025 capitation rates are developed using Wisconsin Medicaid long term care (LTC) MCO encounter, eligibility, and functional screen data for CY 2023 for the MCO eligible population as the primary data source.

Please refer to Sections III and IV of this report for more details.

AA.3.0 – Adjustments to Base Year Data

All adjustments to the base year data are discussed in Sections III and IV of this report. In addition, each item in the checklist is addressed in items AA.3.1 – AA.3.17 below.

AA.3.1 – Benefit Differences

The base data used to calculate the capitation rates has been adjusted to only include services covered under the Medicaid care management program contract.

AA.3.2 – Administrative Cost Allowance Calculations

The MCO capitation rates include explicit administrative allowances by MCO. Please see Section III and Section IV of the report for more details regarding the administrative cost calculation.

AA.3.3 – Special Populations’ Adjustments

The CY 2025 capitation rates methodology does not include an adjustment for special populations as the base MCO encounter data used to calculate the capitation rates is consistent with the Wisconsin Family Care program population.

AA.3.4 – Eligibility Adjustments

The base MCO encounter data only reflects experience for time periods where members were enrolled in a Family Care MCO.

AA.3.5 – Third Party Liability (TPL)

The managed care organizations are responsible for the collection of any TPL recoveries. The MCO encounter data is reported net of TPL recoveries, therefore, no adjustment was necessary.

AA.3.6 – Indian Health Care Provider Payments

The MCOs are not financially at risk for services provided to tribal members receiving care management from IHC providers. This includes fewer than 200 members located in GSRs 10 and 13.

APPENDIX C

Rate Setting Checklist

AA.3.7 – DSH Payments

DSH payments are not included in the capitation rates.

AA.3.8 – FQHC and RHC Reimbursement

The MCOs are responsible for the entirety of the FQHC and RHC payments, which are fully reflected in encounters.

AA.3.9 – Graduate Medical Education (GME)

Inpatient hospital services are not covered under Family Care. Therefore, GME payments are not included in the base data used in the capitation rate calculation.

AA.3.10 – Copayments, Coinsurance, and Deductibles in Capitated Rates

The Wisconsin Family Care program does not include member cost sharing, so no adjustment to base period experience for this issue is required.

AA.3.11 – Medical Cost / Trend Inflation

Trend rates from CY 2023 to CY 2025 were developed by rate category and type of service for Family Care eligible services and individuals using historical MCO encounter data from January 2021 to December 2023 and actuarial judgment.

The trend rates and inflation factors represent the expected change in per capita cost between CY 2023 and CY 2025, net of acuity changes.

Please see Sections III and IV and Exhibit O for more details on the trend development.

AA.3.12 – Utilization Adjustments

Utilization trend is included in AA.3.11.

AA.3.13 – Utilization and Cost Assumptions

The CY 2025 capitation rates use an actuarially sound risk adjustment model to adjust the rates for each participating MCO in a particular GSR in order to reflect the acuity of enrolled members. Acuity adjustments were applied independently from the unit cost and utilization trend adjustments.

AA.3.14 – Post-Eligibility Treatment of Income (PETI)

Capitation rates are developed gross of patient liability, and DHS adjusts capitation paid for each member to reflect that individual's specific patient liability. Encounter payment amounts are gross of patient liability, so no adjustment to the data is necessary for this issue.

AA.3.15 – Incomplete Data Adjustment

The capitation rates include an adjustment to reflect IBNR claims. Please refer to Section III and IV of this report for more information on the development of the IBNR assumptions.

We apply an adjustment to true up care management expenditures to financial statements due to the difficulty in properly and completely collecting this information in the encounter data reporting format. Please refer to Sections III and IV of this report for more information on the development of these adjustment factors.

AA.3.16 – Primary Care Rate Enhancement

The CY 2025 capitation rates only include Long-Term Care services.

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Rate Setting Checklist

AA.3.17 – Health Homes

Not Applicable.

AA.4.0 – Establish Rate Category Groupings

Please refer to Sections III and IV of this report.

AA.4.1 – Eligibility Categories

Target populations for individuals meeting the nursing home level of care requirement are defined in Step 1 of Sections III and IV.

AA.4.2 – Age

Age is not used for rate category groupings outside of the Target Population assignment.

AA.4.3 – Gender

Gender is not used for rate category groupings.

AA.4.4 – Locality / Region

Geographic regions are defined in Appendix A.

AA.4.5 – Risk Adjustments

Acuity adjustment models are described in Sections III and IV.

AA.5.0 – Data Smoothing

We did not perform any data smoothing.

AA.5.1 – Cost-Neutral Data Smoothing Adjustment

We did not perform any data smoothing.

AA.5.2 – Data Distortion Assessment

Our review of the base MCO encounter data did not detect any material distortions or outliers.

AA.5.3 – Data Smoothing Techniques

We determined that a data smoothing mechanism resulting from data distortions was not required.

AA.5.4 – Risk Adjustments

The CY 2025 capitation rates use an actuarially sound risk adjustment model based on a functional screen (NH level of care) to adjust the rates for each participating MCO. Please see Section III of this report. The functional screen risk adjustment mechanism has been developed in accordance with generally accepted actuarial principles and practices.

AA.6.0 – Stop Loss, Reinsurance, or Risk Sharing Arrangements

Not applicable.

AA.6.1 – Commercial Reinsurance

DHS does not require entities to purchase commercial reinsurance.

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Rate Setting Checklist

AA.6.2 – Stop-Loss Program

The CY 2025 capitation rates do not feature a stop-loss program.

AA.6.3 – Risk Corridor Program

The CY 2025 capitation rates will feature a risk corridor as described in Section V of this report.

AA.7.0 – Incentive Arrangements

Please see Section V.

AA.7.1 – Electronic Health Records (EHR) Incentive Payments

DHS has not implemented incentive payments related to EHRs for the contract period.

APPENDIX D

CMS Medicaid Managed Care Rate Development Guide

State of Wisconsin Department of Health Services
Calendar Year 2025 Capitation Rate Development Family Care Program

November 25, 2024

This report assumes that the reader is familiar with the State of Wisconsin's Medicaid program, its benefits, and rate setting principles. The report was prepared solely to provide assistance to DHS to set CY 2025 capitation rates for the Family Care program. It may not be appropriate for other purposes. Milliman does not intend to benefit, and assumes no duty or liability to, other parties who receive this work. This material should only be reviewed in its entirety.

APPENDIX D

Response to 2024 to 2025 Managed Care Rate Development Guide

I. MEDICAID MANAGED CARE RATES

1. General Information

A. Rate Development Standards

- i. A single capitation rate, rather than a range of rates, is developed for each rate cell.
- ii. The rate certification included herein is for the calendar year (CY) 2025 contract period. The previous certification was for CY 2024 contract period.
- iii. This rate certification includes all of the items required in the rate development guide.
 - a. The rate certification is included in Appendix B.
 - b. The final and certified capitation rates for all rate cells and regions can be found in Exhibits G and L.
 - c. The descriptions of the Family Care program can be found in Section I and II of this report.

The following directed payment arrangements apply to CY 2025. Additional documentation of these arrangements is included below in Section I.4.D of this rate setting guide.

- Maximum Provider Fee Schedule
 - Direct Care Workforce
 - Home and Community Based Services Provider Rate Increase (effective June 2021)
 - American Rescue Plan Act Provider Rate Increase (effective January 2022)
 - Supportive Home Care and Residential Care Fee Schedule Increases (effective October 2024)
- iv. Differences in capitation rates for the covered population are based on valid rate development standards and are not based on the rate of Federal financial participation associated with the covered population. This was evaluated for the entire managed care program and includes all managed care contracts for all covered populations.
 - v. Each rate cell is developed independently to be actuarially sound and does not cross-subsidize payments for another rate cell.
 - vi. The effective dates of changes to the Medicaid program are consistent with the assumptions used to develop the capitation rates.
 - vii. The target rate development MLR for the CY 2025 rates is 95.2% for the NH LOC population and Non-NH LOC populations. As such, the capitation rates are developed such that MCOs are expected to achieve a federal MLR of greater than 85%.
 - viii. A single capitation rate, rather than a range of rates, is developed for each rate cell.
 - ix. A single capitation rate, rather than a range of rates, is developed for each rate cell.
 - x. The rate certification submission does demonstrate that the capitation rates were developed using generally accepted actuarial practices and principles and are consistent with the regulatory requirements.
 - a. All adjustments to the capitation rates reflect reasonable, appropriate, and attainable costs.
 - b. No adjustments to the rates are performed outside of the initial rate setting process beyond those outlined in Section V of the report.
 - c. The final contracted rates in each cell match the capitation rates in the certification.
 - xi. The capitation rates included in this submission are certified for all time periods in which they are effective. No rates for a previous time period are used for a future time period.

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Response to 2024 to 2025 Managed Care Rate Development Guide

- xii. The capitation rates were developed to account for the direct and indirect impacts of the COVID-19 public health emergency. Section I of this report contains detailed information about the COVID-19 considerations for the CY 2025 rate development.
- xiii. This rate certification conforms to the procedure for rate certifications for rate and contract amendments. The CY 2025 rates documented in this report are the initial capitation rates for the CY 2025 Wisconsin Medicaid LTC managed care contracts.

B. Appropriate Documentation

- i. The actuary is certifying CY 2025 capitation rates.
- ii. We believe that the attached report properly documents all the elements included in the rate certification and provides CMS enough detail to determine that regulatory standards are met.

Please see Sections I, III and IV of this report for the following details:

- a. Data used, including citations to studies, research papers, other states' analyses, or similar secondary data sources.
 - b. Assumptions made, including any basis or justification for the assumption.
 - c. Methods for analyzing data and developing assumptions and adjustments.
- iii. The actuarial certification includes a target MLR for CY 2025 that is greater than 85%, so we believe the capitation rates are developed such that MCOs are expected to achieve a federal MLR of greater than 85%. We reviewed MCOs past financial results as part of this process.
 - iv. Service cost projection assumptions used in rate development do not differ by managed care organization. Capitation rates differ by MCO based on the MCO admin load and risk score.
 - v. A single capitation rate, rather than a range of rates, is developed for each rate cell.
 - vi. We detail within our responses in this guide the section of our report where each item described in the 2024 to 2025 Medicaid Managed Care Rate Development Guide can be found.
 - vii. All differences in the assumptions, methodologies, and factors used to develop capitation rates for covered populations comply with 42 C.F.R. § 438.4(b)(1), are based on valid rate development standards that represent actual cost differences in providing covered services to the covered populations, and do not vary with the rate of FFP associated with the covered populations.
 - viii. All services and populations included in this rate certification are subject to the regular state Federal Medical Assistance Percentage (FMAP).
 - ix. Relative to the previous rating period, please see Section I of this report for the following details:
 - a. A comparison of the final certified rates in the prior certification.
 - b. A description of material changes to the capitation rate development process.
 - c. The capitation rates in the previous rating period were not adjusted by a *de minimis* amount.
 - x. Section V of the report documents the only known future amendments to these rates for final direct care workforce payments.
 - xi. Section I includes documentation of the COVID-19 considerations and related unwinding considerations in the CY 2025 rate development.

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Response to 2024 to 2025 Managed Care Rate Development Guide

2. Data

A. Rate Development Standards

- i. The rate development process follows CMS rate development standards related to base data.
 - a. DHS provided Milliman with validated encounter data and financial reports for at least the three most recent and complete years prior to the rating period. Managed care plans and DHS have provided detailed financial reporting data for CY 2021 through CY 2023 to the state's actuaries for this and prior year rate development.
 - b. Sections III and IV include documentation of the CY 2023 base data period used to develop the CY 2025 Family Care capitation rates.
 - c. Base data is specific to the population and services expected to be covered by the Family Care program during the CY 2025 rate period.
 - d. The CY 2025 rate calculation uses CY 2023 base data, which is within the CMS three-year requirement.

B. Appropriate Documentation

- i. Milliman did request and receive a full claims and enrollment database from DHS. This information is summarized in Exhibits A and H. DHS provided detailed financial reporting data for CY 2023 and encounter data for CY 2021 through CY 2023 to the state's actuaries for this year's rate development.
- ii. A detailed description of the data used in the rate development methodology can be found in Section III and Section IV of this report. Section III and Section IV also includes comments on the availability and quality of the data used for rate development.
 - a. The CY 2025 capitation rates for the Family Care program are developed using CY 2023 encounter data, financial data, and other information.
 - b. DHS and Milliman went through an extensive data validation process to review all capitated plan data included in the CY 2025 rate setting methodology. DHS internally reviews encounter data submissions and notifies plans of corrections necessary to allow for records to be accepted. Milliman reviewed the encounter and financial data.

The capitated plan financial data, encounter and FFS data, are all of very high quality and appropriate for use in rate development.
 - c. All base data is specific to the populations that will be covered under the CY 2025 Family Care capitation rates.
 - d. The rate documentation methodology does not use a data book separate from what is shown in the report.
- iii. The rate certification and attached report thoroughly describe any material adjustments, and the basis for the adjustments, that are made to the data. Please see Section III and IV of this report for more details.

3. Projected Benefit Costs and Trends

A. Rate Development Standards

- i. The final capitation rates shown in Exhibits G and L are based only upon services described in 42 CFR 438.3(c)(1)(ii) and 438.3(e).
- ii. Each projected benefit cost trend assumption is reasonable and developed in accordance with generally accepted actuarial principles and practices using actual experience of the Medicaid population. Please refer to Sections III and IV of this report for the details.

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Response to 2024 to 2025 Managed Care Rate Development Guide

- iii. Please refer to Sections III and IV of this report for the details related to the treatment of in-lieu of services (ILOS). The ILOS services were required to be cost effective relative to the covered service, and any costs in excess of cost-effective levels were removed from the base data.
- iv. The projected ILOS Cost Percentage is less than 0.1% as described in Section III.B.
- v. The CY 2025 capitation rate methodology does not include any expenses for Institution for Mental Diseases (IMD).

B. Appropriate Documentation

- i. The various exhibits included in this report document the final projected benefit costs by relevant level of detail and is consistent with how the State makes payments to the plans.
- ii. Please refer to Sections III and IV of this report for the methodology and assumptions used to project contract period benefit costs from the base period data to CY 2025. Section I of the report highlights key methodological changes since the previous rate development. The base period costs used in rate development are net of these overpayments.
- iii. The rate certification includes a section on projected benefit cost trends in compliance with 42 CFR §438.7(b)(2). See Step 5 of Section III and Step 4 of Section IV for details related to the development of projected benefit cost trends.
- iv. This certification does not include additional services deemed by the state to be necessary to comply with the parity standards of the Mental Health Parity and Addiction Equity Act.
- v. The ILOS that will be provided during 2025 are outlined below. The projected ILOS Cost Percentage is less than 0.1%. We projected this percentage based on reviewing the estimated CY 2023 ILOS amounts of approximately \$709,000 compared to the total estimated capitation amount of \$3.2 billion. The expectation is no additional in-lieu-of services will be introduced and they will inform a similar percentage of future service costs in the CY 2025 projection period.
 - a. Supportive Home Care
 - b. Respite Care
 - c. Personal emergency response system
 - d. Daily living skills training
 - e. Day habilitation services
 - f. Prevocational services
 - g. Residential care services
 - h. Home delivered meals
 - i. Counseling and therapeutic services
 - j. Specialized transportation – community transportation
 - k. Adult Day Activities
- vi. Since the rate development base data reflects actual program experience, no adjustment for retrospective eligibility periods is necessary.
- vii. Section I documents the impact on projected costs for all material changes to covered benefits or services since the last rate certification. Impacts for all such changes are included in Sections III and IV.
- viii. Sections III and IV of the rate certification includes an estimated impact of the change on the amount of projected benefit costs and a description of the data, assumptions, and methodologies used to develop the adjustment for each change related to covered benefits or services for CY 2025.

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Response to 2024 to 2025 Managed Care Rate Development Guide

4. Special Contract Provisions Related to Payment

A. Incentive Arrangements

The pay for performance, the member relocation incentive payment, and the assisted living quality incentive payment are described in Section V of the report. These incentives will not exceed 5% of the certified rates, and we made no adjustment for the incentive payments in rate development. The rate certification includes a description of the incentive arrangement. See Section V of the report.

B. Withhold Arrangements

The pay for performance withhold is described in Section V of the report. The rate certification includes a description of the withhold arrangement. See Section V of the report.

C. Risk Sharing Mechanism

The functional screen risk adjustment has been developed in accordance with generally accepted actuarial principles and practices and is cost neutral to the state in total.

The CY 2025 capitation rates will feature a risk corridor as described in Section V of this report.

The rate certification includes a description of the risk sharing mechanisms. See Section III of the report for the functional screen risk adjustment and Section V for the risk corridor mechanism.

APPENDIX D

Response to 2024 to 2025 Managed Care Rate Development Guide

D. State Directed Payments

Information for each of the state directed payments is outlined in the tables below. Please see Section V of the rate report for additional documentation of these arrangements.

Control name of the state directed payment	Type of payment (see (i)(A) below)	Brief description (see (i)(B) below)	Is the payment included as a rate adjustment or separate payment term? (see (ii) and (iii) below)
Over MA FFS: WI_Fee_HCBS6_Renewal_20250101-20251231	Maximum fee schedule.	State Plan services provided under the Family Care benefit package are subject to a maximum fee schedule established by the state.	Rate adjustment (base data reflects the long-standing maximum fee schedule arrangement).
DCW: WI_Fee_HCBS5_Renewal_20250101-20251231	Uniform increase for network providers that provide particular services under the contract.	DHS will distribute an amount to the MCOs proportional to the total encounter-reported expenditures for eligible providers. This payment will then be passed through to eligible providers.	Separate payment term; Interim estimate included in this certification.
HCBS Increase: WI_Fee_HCBS4_Renewal_20250101-20251231	Uniform increase for network providers that provide particular services under the contract.	Effective June 1, 2021, DHS is requiring MCOs participating in Family Care to increase provider reimbursement rates for certain home and community-based services. This increase is 4.24% for eligible providers.	Rate adjustment (Base data reflects the existing uniform increase for the network provider arrangement).
ARPA Increase: WI_Fee_HCBS3_Renewal_20250101-20251231	Uniform increase for network providers that provide particular services under the contract.	Effective January 1, 2022, DHS is requiring MCOs participating in Family Care to increase provider reimbursement rates for certain home and community-based services. This increase is 5.0% for eligible providers.	Rate adjustment (Base data reflects the existing uniform increase for the network provider arrangement).
RC and SHC Increase: WI_FEE_HCBS7_20250101-20251231	Minimum fee schedule.	Effective October 1, 2024, DHS is requiring MCOs to meet minimum fee schedule requirements for certain residential care and supportive home care services.	Rate adjustment

DHS will submit 438.6(c) preprints to CMS for 2025 for each of the payments included in the table above. The 2025 preprints will be consistent with the prior preprints approved by CMS. There are no other directed payments in these programs that are not addressed in this certification.

APPENDIX D

Response to 2024 to 2025 Managed Care Rate Development Guide

Additional information for state directed payments included as rate adjustments is outlined in the table below

Control name of the state directed payment	Rate cells affected (see (A) below)	Impact (see (B) below)	Description of the adjustment (see (C) below)	Confirmation the rates are consistent with the preprint (see (D) below)	For maximum fee schedules, provide the information requested in (E) below
Over MA FFS: WI_Fee_HCBS 6_Renewal_20250101-20251231	All rate cells	Reflected in Base Data summarized in Exhibits A and H	The maximum fee schedule is a long-standing arrangement which was in effect during the base data period. Please refer to Section V of the rate certification for additional information.	The fee schedule is consistent with the preprint.	MCOs have the ability to exceed the limit when necessary for executing a reimbursement contract. We expect no material change to the value of exceptions made over the maximum fee schedule relative to the base data, so no adjustments were made.
HCBS Increase: WI_Fee_HCBS 4_Renewal_20250101-20251231	All rate cells	Reflected in Base Data summarized in Exhibits A and H	The arrangement was in effect during the base data period. Please refer to Section V of the rate certification for additional information.	This rate increase is consistent with the preprint.	Not Applicable
ARPA Increase: WI_Fee_HCBS 3_Renewal_20250101-20251231	All rate cells	Reflected in Base Data summarized in Exhibits A and H	The arrangement was in effect during the base data period. Please refer to Section V of the rate certification for additional information.	This rate increase is consistent with the preprint.	Not Applicable
RC and SHC Increase: WI_FEE_HCBS 7_20250101-20251231	All rate cells	Reflected in HCBS Minimum Fee Schedule Adjustment in Exhibits E and J	Implemented as a base data adjustment, specific to each combination of target group and GSR. Please refer to Section IV of the rate certification for additional information.	The adjustment is consistent with the preprint.	Not Applicable

The table below documents additional information for the state directed payments incorporated into the initial rate certification as a separate payment term.

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Response to 2024 to 2025 Managed Care Rate Development Guide

Control name of the state directed payment	Aggregate amount included in the certification (see (A) below)	Statement that the actuary is certifying the separate payment term (see (B) below)	The magnitude on a PMPM Basis (see (C) below)	Confirmation the rate development is consistent with the preprint (see (D) below)	Confirmation that the state and actuary will submit required documentation at the end of the rating period (as applicable; See (E) below)
DCW: WI_Fee_HC BS5_Renewal_20250101-20251231	The aggregate amount of the payment applicable to the rate certification is \$151.5 million, of which \$142.2 million is estimated to be allocated to Family Care.	Confirmed.	Implemented as a PMPM Add-On. The values specific to each rate cell are an estimate at this time. Capitation rates will be updated to reflect realized payments. Please refer to Section V of the rate certification for additional information.	This rate development is consistent with the preprint.	After the rating period is complete, the state will submit documentation to CMS that incorporates the total amount of the state directed payment specific to each rate cell into the rate certification's rate cell-specific capitation rate consistent with the distribution methodology.

E. Pass-Through Payments

The CY 2025 capitation rate methodology does not include any pass-through payments.

5. Projected Non-Benefit Costs

A. Rate Development Standards

- i. The development of the non-benefit component of the CY 2025 rates is compliant with 42 CFR §438.5(e) and includes reasonable, appropriate, and attainable expenses related to MCO administration, taxes, licensing and regulatory fees, contribution to reserves, risk margin, and cost of capital. Please see Sections III and IV.
- ii. The non-benefit costs included in the CY 2025 capitation rates are developed as a per member per month for common categories of administrative expenses. Please see Sections III and IV for additional detail on how the administrative component is calculated.

B. Appropriate Documentation

- i. Please refer to Sections III and IV of this report for a detailed description of the data and methodology used to develop of the projected non-benefit costs included in the capitation rates. The report includes a description of changes made since the last rate development.
- ii. The projected non-benefit costs include appropriate consideration for administrative costs, taxes, licensing and regulatory fees, other assessments and fees, contribution to reserves, risk margin, and cost of capital.
- iii. Historical costs serve as the basis for the projected administrative load as described in Sections III and IV of this report. The table below summarizes current and historical administrative costs by MCO.

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Response to 2024 to 2025 Managed Care Rate Development Guide

Wisconsin Department of Health Services Comparison of Projected CY 2025 and Actual CY 2023 Administrative PMPMs			
Year Ending December 31, 2023			
MCO	CY 2025 Admin PMPM	Actual Admin PMPM	Difference
CCI	\$136.89	\$77.79	\$59.10
LCI	\$164.27	\$157.63	\$6.64
MCW	\$136.89	\$127.65	\$9.24
Inclusa	\$136.89	\$150.16	-\$13.27

6. Risk Adjustment

A. Rate Development Standards

- i. The functional screen and risk adjustment detailed in Sections III and IV of the report are used for explaining costs of services covered under the contract for defined populations across MCOs.
- ii. The functional screen risk adjustment has been developed in accordance with generally accepted actuarial principles and practices and cost neutral to the state for the base period base data cohort.

B. Appropriate Documentation

- i. The functional screen and risk adjustment process are detailed in Sections III and IV of the report.
- ii. Section V of the report documents the various retrospective risk adjustment mechanisms.
- iii. The rate certification and supporting documentation do specifically include a description of any changes that are made to risk adjustment models since the last rating period and documentation that the risk adjustment model is budget neutral in accordance with 42 CFR §438.5(g).

7. Acuity Adjustment

A. Rate Development Standards

- i. Section III of this report documents the use of more recent functional screens and acuity trends separate from benefit utilization and unit cost trends to consider the change in acuity for the Family Care population.

B. Appropriate Documentation

- i. The rate certification includes a description of the acuity trend adjustment. This adjustment is developed according with generally accepted actuarial principles and practices.

II. MEDICAID MANAGED CARE RATES WITH LONG-TERM SERVICES AND SUPPORTS

1. Managed Long-Term Services and Supports

A. The Wisconsin Family Care program only covers Long-Term Care services. Therefore, the information included in this rate certification and report is specific to MLTSS.

B. Rate Development Standards

- i. The Wisconsin Family Care program capitation rates blend costs for individuals in all settings of care.

C. Appropriate Documentation

- i. Sections I-IV of this report address the following items:
 - a. The structure of the capitation rates and rate cells or rating categories.

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Response to 2024 to 2025 Managed Care Rate Development Guide

- b. The structure of the rates and the rate cells, and the data, assumptions, and methodology used to develop the rates in light of the overall rate setting approach.
 - c. Any other payment structures, incentives, or disincentives used to pay the MCOs.
 - d. The expected effect that managing LTSS has on the utilization and unit costs of services.
 - e. Any effect that the management of this care is expected to have within each care setting and any effect in managing the level of care that the beneficiary receives.
- ii. Please refer to Section III and Section IV of this report for a detailed description of the data and methodology used to develop of the projected non-benefit costs included in the capitation rates. The report includes a description of changes made since the last rate development.
 - iii. The Wisconsin Family Care capitation rates presented in this report are based entirely on historical MCO encounter data and financial experience. Please refer to Sections III and IV for a description of the data sources used to develop the assumptions used for rate setting.

III. NEW ADULT GROUP CAPITATION RATES

This certification does not include rates for the new adult group under 1902(a)(10)(A)(i)(VIII) of the Social Security Act.

APPENDIX E

Home and Community Based Services Minimum Payment Rate Development

State of Wisconsin Department of Health Services
Calendar Year 2025 Capitation Rate Development Family Care Program

November 25, 2024

This report assumes that the reader is familiar with the State of Wisconsin's Medicaid program, its benefits, and rate setting principles. The report was prepared solely to provide assistance to DHS to set CY 2025 capitation rates for the Family Care program. It may not be appropriate for other purposes. Milliman does not intend to benefit, and assumes no duty or liability to, other parties who receive this work. This material should only be reviewed in its entirety.

MILLIMAN CLIENT REPORT

ARPA Home and Community Based Services Minimum Payment Rate Development – Residential and Supportive Home Care Services

State of Wisconsin Department of Health Services

January 30, 2024

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Appendix A: Residential Care Staffing Assumptions

Appendix B: Employee Related Expense Percentage Calculation by Direct Care Staff Category

Appendix C: Service-Specific Detailed Rate Buildups

I. Executive Summary

Milliman, Inc. (Milliman) has been retained by the Wisconsin Department of Health Services (DHS) to develop Medicaid home and community-based services (HCBS) minimum payment rates for the following HCBS provided in the Family Care, Family Care Partnership and PACE managed care programs, with an anticipated effective date of July 1, 2024. The minimum payment rates developed herein would not apply to the IRIS (Include, Respect, I Self-Direct) program.

- Adult family homes (AFHs)
- Residential care apartment complexes (RCACs)
- Community-based residential facilities (CBRFs)
- Agency supportive home care (SHC) services
- Non-agency SHC services, per DHS these are considered to occur under self-direction

The purpose of the minimum payment rates is to establish a “floor” that supports a minimum payment amount for residential and supportive home care services that is consistent with efficiency, economy, quality of care, and access to care. These minimum payment rates are also intended to provide a transparent, objective benchmark that DHS and stakeholders can use to monitor rates over time.

DHS has indicated the following regarding implementation of the minimum payment rates and managed care organization (MCO) contracted amounts, which reflects conversations with MCOs during minimum payment rate development:

- MCOs will give SHC and residential service providers a rate increase for any member for whom they currently receive reimbursement below the minimum fee for the provider type and tier.
- MCOs and providers can still negotiate higher rates than the minimums based on provider or member needs, and MCOs are not required to change their payment methodologies as long as providers are not paid less than the minimum by tier and setting (described later in this report).
- DHS will not require or expect that MCOs reduce rates to other providers to offset the cost of implementing the minimum payment rates.
- In the case of payment for SHC using per diems or payment units other than 15 minute increments, DHS will require that MCOs pay SHC rates that are no less than what they would have paid using the 15-minute SHC minimum fee.
- DHS’ implementation will require minimum payment rates for AFH 1-2 bed owner occupied residences to be no less than the equivalent of the SHC minimum payment rate multiplied by the hours of 1:1 care.
- DHS expects that MCOs will continue to negotiate payment rates for members requiring 1:1 care and will monitor that MCOs are paying at least the minimum payment rate associated with Tier 3.

The minimum payment rates and corresponding fiscal impacts presented in this report are intended to support DHS and Joint Finance Committee budget discussions and reflect a direct support professional (DSP) hourly wage of \$15.75, per DHS’ request. Payment rate assumptions also reflect consideration of program and service requirements, provider feedback gathered via regular workgroups and other stakeholder meetings, input from MCOs regarding current service delivery and billing practices, national and state workforce and provider cost data, and discussions with DHS program experts.

RESULTS

Figure 1 below shows the proposed July 1, 2024 minimum payment rates for each tier and setting of care. SHC services have separate minimum payment rates for services provided through an agency and those that are contracted directly with the service provider. Residential minimum payment rates vary by member acuity tier and setting of care. Tiers 1 to 3 are determined through key member behavioral and functional needs identified in the member’s functional screen. Not all settings of care are expected to serve members at all levels of acuity, so some settings do not have minimum rates for all three tiers.

FIGURE 1: PROPOSED MINIMUM PAYMENT RATES

Setting	15 Min Rate	Single Tier	Tier 1 Per Diem	Tier 2 Per Diem	Tier 3 Per Diem
SHC – Agency	\$6.38				
SHC – Non-Agency*	\$4.08				
AFH 1 – 2			\$373.80	\$406.36	\$423.65
AFH 3 – 4			\$203.50	\$220.79	\$238.08
CBRF 5 – 8			\$141.35	\$158.65	\$168.31
CBRF 9+			\$100.75	\$115.07	\$133.38
RCAC		\$67.41			

* Per DHS, these are considered to occur under self-direction

Implementation of these minimum payments is projected to increase Family Care, Family Care Partnership and PACE program costs by an estimated \$258 million in combined state and federal funds between July 1, 2024 and June 30, 2025 (State Fiscal Year 2025 or SFY 2025) as illustrated in Table 2 below. We developed the estimated fiscal impact using Calendar Year (CY) 2022 MCO encounter data and member functional screens and then trended to CY 2024. The two residential adjustments in Figure 2 adjust at a high level for limitations in the encounter data that are not able to be attributed to the more granular fiscal impact analyses in the appendices of this report.

FIGURE 2: TOTAL FISCAL IMPACT DEVELOPMENT

	Estimated Fiscal Impact (\$millions)
Supportive Home Care	\$37.3
Residential Care	232.1
Residential Day Programs Adjustment	-22.6
Residential Unit Limit Adjustment	11.3
Total Fiscal Impact	\$258.1

The projected wage, employee-related benefits and fiscal impacts in this report include trending to CY 2024 levels. We do not anticipate that wages and estimated fiscal impacts would vary significantly between CY 2024 and SFY 2025. Should DHS implement and maintain the minimum payment rate structure beyond SFY 2025, we recommend updating the minimum payment rates to incorporate updated wage and service utilization experience.

It is our understanding that DHS will incorporate the estimated fiscal impact calculations into managed care capitation to fund the cost of the minimum payment rate increases, and MCOs will not need to reduce rates to other providers to offset the cost of implementing the minimum payment rates.

The remainder of this report provides an in-depth description of the approach, methodology, and assumptions used to develop the minimum payment rates and related fiscal impact estimates.

II. Notable Work Contributing to the Minimum Payment Rates

The development of the minimum payment rates reflects intensive work with DHS and other stakeholders to better understand the costs associated with delivery of the included services. This process has included the following notable efforts:

Quarterly Stakeholder Meetings (April 2022 – April 2023): DHS held quarterly meetings with representatives from key stakeholders, e.g., associations, providers, managed care entities. Meetings provided a forum for key aspects of the project, such as:

- Project status updates
- Feedback on the minimum payment rate assumptions and preliminary payment rates (e.g., wage levels and approach to tiering rates)
- Provider cost survey approach
- Minimum payment rate implementation considerations

Monthly Provider Workgroup Meetings (May 2022 – April 2023): DHS held separate monthly Workgroup meetings with residential care providers and SHC providers. These two workgroups provided:

- Subject matter expertise regarding service delivery and related costs for services
- Feedback from the perspective of their organization and other organizations across the state providing similar services
- Feedback on survey approach, survey tool and instructions, key minimum payment rate assumptions and rates

Focus Groups for 1-2 Bed Owner-Occupied AFHs (October 2022): DHS held five focus groups reflecting owner-occupied AFH 1-2 bed providers contracting with the Family Care / Family Care Partnership MCOs, facilitated by Milliman. The focus groups discussed staffing structure and service delivery costs and challenges specific to the service setting.

Technical Staffing Subgroups by Provider Setting (October 2022 and April 2023): DHS invited residential care providers to participate in subgroup meetings facilitated by DHS contractor Kaphengst Consulting LLC. Kaphengst Consulting, LLC provides consulting services to small and medium-sized companies that provide home and community-based, long-term care, and assisted living services in the community to children and adults with disabilities and older adults. These subgroup meetings were used to collect information on staffing assumptions specific to DHS' proposed residential care tier definitions.

Family Care and Family Care Partnership MCO meetings (2022-2023): DHS held meetings to obtain additional information to inform the fiscal impact estimates of the minimum payment rates. Topics included payments when a member is enrolled in day treatment activities, encounter adjustments, member-specific negotiated rates, and compliance practices.

American Rescue Plan Act (ARPA) Adult HCBS Minimum Fee Schedule Provider Cost Survey (October – November 2023): DHS requested that Family Care and Family Care Partnership providers delivering AFH, RCAC, CBRF, SHC and personal care services respond to a provider survey specifically targeted to support minimum payment rate development. Live-in caregivers, owner-occupied AFHs with 1 to 2 beds, and any providers that use their social security number as their provider ID for billing purposes were not asked to complete the survey. This survey collected information on provider operating costs, such as employee wages, employee benefits and taxes, transportation costs, and administrative costs. Milliman developed and administered the survey, including providing technical assistance, multiple training sessions, and responses to frequently asked questions.

Two hundred nineteen providers responded reflecting a wide range of services, as illustrated in Figure 3. Due to quality concerns for some data elements submitted, it was possible to review the survey data to inform assumptions, but survey results were not used as direct inputs into the minimum payment rate assumptions.

FIGURE 3: PROVIDER RESPONSE BY SETTING

SETTING	NUMBER OF SURVEYS WITH SETTING*
AFH 1-2	25
AFH 3-4	82
RCAC	40
CBRFs<=8	39
CBRFs>8	84
SHC	56
PC	28

**Individual provider surveys may reflect more than one setting.*

Feedback from MCOs (2022-2023): DHS had numerous discussions with Family Care / Family Care Partnership MCOs throughout the development phase to further understand current payment methodologies, and contracting and billing practices, including self-direction and non-agency and agency-based SHC. These conversations informed DHS' input on the minimum payment rate and fiscal impact assumptions presented in this report.

III. Key Stakeholder Feedback

DHS collected stakeholder feedback on key aspects of current service delivery related expenses, challenges, and operations framework. Figure 4 below highlights key stakeholder feedback received to date through the stakeholder engagement efforts described in *Section I. Notable Work Contributing to the Minimum Payment Rates*.

FIGURE 4: KEY THEMES FROM CROSS WORKGROUP: RESIDENTIAL AND SHC / PC SERVICES PROVIDERS

TOPIC	KEY THEMES
Workforce and Staffing Dynamics	<ul style="list-style-type: none"> ▪ Providers have been experiencing ongoing staffing challenges, which have been exacerbated by the pandemic. ▪ Wages for direct care staff (frontline workers and their supervisors, nursing staff) have not been able to keep up with inflation. ▪ Competing industries offer higher wages and benefits for positions that are not as intensive or demanding as those for HCBS (e.g., retail, fast food, and light industrial). ▪ Individuals with complex needs and high behavioral health needs require more staffing on average. ▪ Overall concern regarding the lack of a BLS Standard Occupational Classification (SOC) code for DSPs in particular, as DSP responsibilities include more than personal care tasks. ▪ Individuals range in their intensity of needs, in particular related to high behavioral health needs.
Housing-related costs for residential care	<ul style="list-style-type: none"> ▪ Room and board payments do not always cover the necessary housing-related costs. <i>Note: Room and board costs were not included in minimum payment rate determination based on Medicaid regulations.</i> ▪ Home modifications that are necessary for care and supervision should be included under the care and supervision part of the payment rate.
Transportation associated costs	<ul style="list-style-type: none"> ▪ Current payment rates do not fully cover the costs of fuel, obtaining new provider vehicles and maintaining existing vehicles. ▪ MCOs often require that the payment rate for residential care includes all of a member's transportation needs without further definition; this is not reasonable due to the extensive transportation needs of some members. ▪ Having separate staff for residential care transportation tasks is not always possible.
Variation in residential care staffing during the day	<ul style="list-style-type: none"> ▪ The COVID pandemic has changed the extent to which individuals participate in services outside of the home, changing residential care staffing needs during the day. Some providers report that staffing does not vary that much throughout the day as some individuals will remain in the home during the day, and because staff must still be available to support individuals that are outside of the home (e.g., picking up early, as needed).
Other topics	<ul style="list-style-type: none"> ▪ Some providers reported increased costs related to meeting regulatory requirements, e.g., related to increasing nursing time, and space needed to train staff.

IV. Methodology

A. MINIMUM PAYMENT RATE DEVELOPMENT APPROACH

We used an independent rate model (IRM) approach to calculate the average costs that a reasonably efficient provider would be expected to incur while delivering the services discussed in this report. As denoted by its description — *independent* rate model — this approach determines the costs related to the individual components shown in Figure 5 and sums the component amounts to derive a rate for each service. The IRM approach serves to capture and document the average expected costs a reasonably efficient provider would incur while delivering a service. Rather than relying on actual costs incurred from a prior time period to determine what the rates should be, the IRM approach builds rates from the “ground up” and considers what the costs may be to provide the service based on a set of assumptions. This approach provides transparency to rates that are consistent with efficiency, economy, quality of care, and access to care. This transparency includes clear and concise documentation of the rate development process, where each component can be independently reviewed and assessed. The identification of assumptions by individual rate model component allows for easy updates to accommodate the ever-changing healthcare landscape and regulatory environment.

The IRM approach can be distinguished from other provider payment methodologies in that it estimates the costs for each service given the resources (salaries and other expenses) reasonably expected to be required, on average, while delivering the service. This approach relies on multiple independent data sources to develop rate model assumptions. By contrast, many cost-based methods rely primarily on the actual reported historical costs incurred while delivering services, which can be affected by operating or service delivery decisions made by providers. These operating or service delivery decisions may be inconsistent with program service delivery standards or be caused by program funding limitations that do not necessarily consider the average resource requirements associated with providing these services.

To the extent actual costs incurred by service providers are affected by external factors, such as legislatively-mandated funding levels that are not consistent with factors that drive the market, the IRM approach also provides a means to communicate what costs may reasonably be incurred, and the issues faced by providers, so decision makers can more equitably allocate resources based on this information.

FIGURE 5: INDEPENDENT RATE MODEL COMPONENTS

COMPONENT	ELEMENTS	SUB-ELEMENTS	CLARIFYING NOTES
Clinical Staff and Supervisor Salaries and Wages	Service-related time	Direct time	Corresponding time unit, or staffing requirement assumptions where not defined Adjusted for staffing ratios for some services (i.e., more than one person served concurrently, e.g., in group counseling sessions or for residential services).
		Indirect time	Service-necessary planning, note taking and preparation time
		Transportation time	Travel time related to providing service
		PTO / training / conference time	Paid vacation, holiday, sick, training and conference time. Also considers additional training time attributable to employee turnover
	Supervisor time	Accounted for using a span of control variable	
	Wage rates	Can vary for overtime and weekend shift differentials	Wage rates vary depending on types of direct service employees, which have been assigned to provider groups
Employee Related Expenses	Payroll-related taxes and fees	Federal Insurance Contributions Act (FICA), Federal Unemployment Tax Act (FUTA), State Unemployment Insurance (SUI), Workers Compensation	Applicable to all employees, and varies by wage level assumption
	Employee benefits	Health, dental, vision, life and disability insurance, and retirement benefits	Amounts may vary by provider group
Transportation	Vehicle operating expenses	Includes all ownership and maintenance-related expenses	Varies by service with costs estimated based on the federal reimbursement rate.
Administration, Program Support, Overhead	All other business-related costs	Includes program operating expenses, including management, accounting, legal, information technology, etc.	Excludes room and board expenses.

Section III.B provides a detailed description of each of the components in Figure 2. The first two – clinical staff and supervisor salary and wages, and employee related expenses (EREs) – comprise the largest portion of the expected costs built into the rate models. We have excluded room and board expenses from the minimum payment rate calculations as these expenses are not allowed for Medicaid payment per federal Medicaid regulation.

We used two different types of rate models to develop the residential and SHC minimum payment rates, described in Figure 6. These rate models include similar types of assumptions, cost components, and elements with adjustments based on service-specific requirements.

FIGURE 6: RATE MODEL APPROACHES

MODEL	RELATED SERVICE	OVERALL DESCRIPTION
Per Unit Rate Model	SHC 15 min rate	<ul style="list-style-type: none"> ▪ Used when the service time assumptions related to providing the service can be reasonably determined on a per unit basis. ▪ Relies on the assumption that direct care staff incur time when a unit of service is provided, with supervision as necessary. ▪ The resulting rate per unit reflects the adjusted total minutes multiplied by the hourly labor-related cost components, and then adding all other applicable rate components. The administration / program support/overhead component is included in the rate per unit by taking the total cost of all prior components divided by one minus the administration / program support / overhead percentage amount
24/7 Shift-Based Rate Model	Residential care services	<ul style="list-style-type: none"> ▪ Used for services where more than one individual is served by a direct care staff group, typically in a residential setting, where direct care staff are expected to be on-site for scheduled periods or shifts, set up to provide service coverage over an extended period of time, or on a 24/7 basis. ▪ Considers the number of direct care staff required for each shift for each day, including separate staffing patterns for weekday periods and weekends. ▪ Incorporates an assumption for a reasonable percentage of hours paid at time and a half pay rate since the direct care staff delivering these services commonly earn time and a half pay by working overtime or holiday hours. ▪ Calculates separate weekly wage expenses and ERE expenses (including time and a half pay) for the direct care staff groups delivering the service. These values are then converted to an average daily expense amount per individual served. ▪ Adjusted weekly service time sub-elements include direct care staff and supervisor time per week and a PTO adjustment factor. ▪ Add-on cost components per unit <ul style="list-style-type: none"> – Transportation expenses – Caseload efficiency – Program support costs, administration, and overhead

While the IRM is intended to be as inclusive as possible for the purpose of explicitly accounting for the key cost components of delivering a specific service, there are situations which may require special considerations of the cost structure or cost elements unique to a specific service operation environment or need. The minimum payment rates are intended to establish a “floor” and are not meant to exclude the ability of MCOs and providers to consider these types of situations as part of payment rate negotiations.

In *Section III.B. Direct Care Staff Categories* and *Section III.C. Rate Model Components* we provide more detail regarding each of IRM components along with their elements and sub-elements. *Subsection III.C.5* provides payment rate assumptions specific to the SHC non-agency-based minimum payment rate.

B. DIRECT CARE STAFF CATEGORIES

We determined model assumptions that drive the staff salaries and wages, PTO assumptions, and ERE components (described in *Section III.B. Rate Model Components*) at the direct care staff category level. These categories, developed based on DHS and stakeholder feedback, reflect the staff types needed to deliver the SHC and residential care services under analysis.

FIGURE 7: DIRECT CARE STAFF CATEGORIES

Direct Support Professional (DSP)

Note: This direct care staff category reflects frontline workers for residential and SHC services and includes staff responsible for transportation of members.

DSP Supervisor

Registered Nurse / Behavioral Health Professional

Registered Nurse

Section III.B.1 Direct Care Staff and Supervisor Salary and Wages provides a description of how we identified the BLS SOC code(s) for each of these categories for purposes of wage development.

C. RATE MODEL COMPONENTS

This subsection provides a description of the key rate components listed in Figure 5, which are:

- Direct care staff and supervisor salary and wages
- Employee related expenses
- Transportation
- Administration, program support, overhead

This subsection also includes considerations specific to the non-agency SHC minimum payment rate.

1. Direct Care Staff and Supervisor Salary and Wages

The direct care staff salary and wage components are typically the largest components of the payment rates, comprising the labor-related cost, or the product of the time and expected wage rates for the direct care staff who deliver each of the services. This component includes costs associated with the direct care staff expected to deliver the services and their immediate supervisors.

Staff Time

We identified direct care staff time using staffing assumptions provided by DHS, and included adjustments for PTO, holidays, and in some cases overtime.

- **Residential Care** – DHS developed initial staffing assumptions by residential care setting and held technical staffing subgroup meetings in October 2022 and in April 2023 to further refine assumptions. DHS shared staffing assumptions with workgroup members to obtain additional feedback prior to finalizing the assumptions for Milliman's inclusion in payment rate development. Appendix A provides the staffing assumptions by residential care service setting included in the minimum payment rates.
- **SHC** – Minimum payment rates reflect face-to-face time spent with members, billed in 15 minute increments. DHS program staff indicated that no indirect time should be included in the payment rates based on DHS expectations regarding service-related documentation by DSPs occurring concurrently with service provision, and DHS' discussions with MCOs regarding current service delivery expectations and contracting practices. We based DSP supervisor time on a 1:20 supervisor span of control (1 supervisor to 20 DSPs) based on DHS program experts' input.

Staff time also included assumptions related to training time, PTO, overtime / holidays, turnover and a residential care caseload efficiency factor, as described below in Figure 8. *Subsection III.C.5* provides information regarding the SHC non-agency-based minimum payment rate.

FIGURE 8: SUMMARY OF SUB-ELEMENTS RELATED TO PROVIDER GROUPS TIME

TIME SUB-ELEMENT	DEFINITION	ASSUMPTIONS
Training hours	<ul style="list-style-type: none"> Accounts for annual training and / or conference time expected to be incurred by direct care staff and supervisors. 	<ul style="list-style-type: none"> Training hours informed by stakeholder feedback New hire training hours set by service setting: <ul style="list-style-type: none"> Residential Care: 80 hours SHC: 45 hours Ongoing training hours (annual) of 20 total
PTO – annual hours	<ul style="list-style-type: none"> Accounts for additional time that must be covered over the course of a year by other direct care staff, thereby representing additional direct care staff time per unit: <ul style="list-style-type: none"> Annual time related paid vacation, holiday, and sick time. 	<ul style="list-style-type: none"> 10 holidays (9 state holidays and a floating holiday). Overtime is applied to these days at time and a half. 2.5 weeks of additional PTO (8 hours per day) Adjusted based on the Wisconsin-specific median percentage of employees that are full-time.¹
Overtime / Holiday	<ul style="list-style-type: none"> Accounts for overtime hours and holidays 	<ul style="list-style-type: none"> 1.5 applied to 10 holidays
Turnover	<ul style="list-style-type: none"> The turnover rate is the assumed percentage of employed staff that leave an organization during the same time period. The turnover rate is used to identify the number of training hours needed for new hires that is reflected in the payment rate. 	<ul style="list-style-type: none"> 35%, informed by other state payment rate assumptions and assumes increased stability in DSP workforce. For context, recently reported turnover rates for HCBS agencies include: <ul style="list-style-type: none"> 51%: Median turnover rate reported by Wisconsin HCBS providers via DHS' HCBS 2022 Cost and Wage Survey (146 responses, all direct care staff, with agencies reporting turnover rates >100% excluded) 34%: Median turnover rate for Wisconsin reported in the 2021 NCI / IDD Staff Stability Survey (203 responses, DSPs only, with agencies reporting turnover rates >=500% excluded)
Residential care – Caseload efficiency factor	<ul style="list-style-type: none"> Accounts for staff productivity 	<ul style="list-style-type: none"> 95%, informed by other state payment rate assumptions for similar services

The minimum payment rates are not intended to reflect all circumstances. As such, we have developed minimum payment rates using the maximum number of residents for AFH and CBRF settings, and staffing needed per 10 residents for CBRFs 9+ and RCACs.

Wage Rate Assumptions for Direct Care Staff and Supervisors

We developed the direct care staff hourly wage for each direct care staff category using Wisconsin-specific May 2021 wage data from the BLS and input from DHS specific to the DSP wage. We used BLS wage data because it is publicly available, state-specific, updated on an annual basis, collected in a consistent and statistically credible manner, and allows for wage assumptions to vary by wage percentile and by direct care staff category. We aligned Standard Occupational Classification (SOC) codes from the BLS data to the direct care staff categories based on position responsibilities, a review of SOC code descriptions, and feedback from DHS and provider workgroup discussions.

DSP – Identification of BLS SOC Codes As BLS data does not include an SOC code that reflects the wide range of responsibilities for HCBS frontline direct care workers, we relied on a blend of relevant BLS SOC codes to define the DSP staff category. This blending approach is a common approach used by other states, with the Home Health and Personal Care Aide BLS SOC code often receiving the largest weight for HCBS frontline workers and blended with one or more occupational code(s) that recognize the variable nature of delivering HCBS. BLS SOC codes that have been considered by other states during blending for purposes of HCBS frontline worker wage identification include:

¹ National Core Indicators Intellectual and Developmental Disabilities. 2021 State of the Workforce NCI / DD Report. 2022. Table 23. Accessed online: <https://idd.nationalcoreindicators.org/wp-content/uploads/2023/02/2021StateoftheWorkforceReport-20230209.pdf>

- Social and Human Service Assistant (21-1093)
- Recreation Workers (39-9032)
- Rehabilitation Counselors (21-1015)
- Psychiatric Aides (31-1133)
- Psychiatric Technicians (29-2053)
- Medical Assistants (31-9092)
- Residential Advisors (39-9041)
- Passenger Vehicle Drivers (53-3058)
- Physical Therapist Aides (31-2022)
- Community and Social Service Specialist, All Other (21-1099)
- Healthcare Support Worker, All Other (31-9099)

After a thorough review of the BLS definitions for each of these occupational definitions, consideration of provider feedback, and extensive discussion with DHS staff, we chose to use the following BLS SOC codes and blending weights for the DSP staff category:

- Home Health and Personal Care Aides (31-1120): 95%
- Rehabilitation Counselors (21-1015): 5%

Registered Nurse / Behavioral Health Professional – Identification of BLS SOC Codes We defined the Registered Nurse / Behavioral Health Professional using the following BLS SOC codes and blending weights:

- Healthcare Social Workers (21-1022): 25%
- Mental Health and Substance Abuse Social Workers (21-1023): 25%
- Registered Nurses (29-1141): 50%

Trending We trended wages to CY 2024 levels and do not anticipate that wages would vary significantly between CY 2024 and SFY 2025. Should DHS implement and maintain the minimum payment rate structure beyond CY 2025, we recommend updating the payment rates to incorporate updated wage and service utilization experience. We applied an annual trend factor of 4.00% to the base wage rates based on analyses of the Wisconsin annual wage trend from BLS wage data for related BLS SOC codes, and Federal Reserve Economic Data hourly wage trend for all employees. The use of 4.00% wage trend factor resulted in an overall assumed aggregate increase of 13.2% in direct care worker wages from May 2021 to July 2024.

Wage Identification Figure 9 provides a summary of the direct care staff category wages and related BLS percentile selections for purposes of minimum payment rate development. The wage identification process included discussion with DHS, consideration of provider feedback and a review of Wisconsin-specific wage data from BLS, the provider survey, and the National Core Indicators Intellectual and Developmental Disabilities State of the Workforce Survey.

FIGURE 9: SUMMARY OF DIRECT CARE STAFF CATEGORY WAGES USED IN MINIMUM PAYMENT RATE DEVELOPMENT

STAFF CATEGORY	WAGE	DESCRIPTION
DSP	\$15.75	Wage value was provided by DHS and is equivalent to the 50th percentile of wages for the selected BLS SOC codes (described above)
DSP Supervisor	\$20.25	Set relative to the DSP wage based on the relationship between the following: 50 th percentile of BLS wages for the DSP staff category 50 th percentile of the BLS wage for the Rehab Counselors BLS SOC code
RN / BH Professional	\$35.44	50 th percentile of BLS wages for selected BLS SOC codes (described above)
RN	\$41.41	50 th percentile of the BLS wage for the Registered Nurse BLS SOC code

2. Employee Related Expenses

The ERE component captures the expenditures expected to be incurred for direct care staff and is expressed as a percentage specific to each direct care staff category. The ERE component includes:

- Employer portion of payroll taxes
- Employer portion of employee medical and other insurance benefits
- Employer portion of retirement expenses

A significant portion of the ERE is driven by the cost of health insurance and retirement benefits the employer provides to its employees. Assumptions developed for the health insurance and retirement benefits components were based on the following considerations:

- Health insurance – \$4,218 per year based on:
 - BLS hourly insurance cost²
 - Adjustment made to reflect differences in health insurance offer and take-up rates between Wisconsin HCBS-specific data (2021 NCI-IDD Staff Stability Survey) and nationwide data
 - Review of employee-related benefit costs in Wisconsin HCBS provider survey data
- Retirement benefit percentage – 1.68% based on:
 - Defined contribution retirement as a percent of wages and salaries and paid leave from BLS data
 - Adjustments made for differences in the percentage of employers offering sponsored retirement plans between Wisconsin HCBS-specific data (2021 NCI / IDD Staff Stability Survey) and nationwide data
 - Review of Wisconsin HCBS provider survey data collected for minimum payment rate development purposes

Figure 10 provides a summary of the ERE assumptions and their related sources. *Subsection III.C.5* provides information regarding the ERE assumptions for the SHC non-agency-based minimum payment rate.

² BLS' definition of insurance encompasses life, health, and short- and long-term disability costs

FIGURE 10: EMPLOYEE RELATED EXPENSE ASSUMPTIONS

COMPONENTS	ASSUMPTIONS FOR CY 2024	SOURCE
FICA Limit	\$162,900	\$162,900 projected for 2024 Source: 2021 OASDI Trustees Report. Section C: Program-Specific Assumptions and Methods. Accessed online (April 20, 2023): https://www.ssa.gov/OACT/TR/2021/V_C_prog.html#1047210
FICA Percentage	7.65%	FICA consists of Social Security and Medicare Withholding Rates (6.2% and 1.45%, respectively). Social security tax has a wage base limit (projected to be \$162,900 in 2024). Source: Internal Revenue Service. Topic 751, Social Security and Medicare Withholding Rates. Accessed online (April 20, 2023): https://www.irs.gov/taxtopics/tc751
FUTA Tax	\$420	6% of first \$7,000 Source: Internal Revenue Service. Topic No. 759 Form 940 – Employer’s Annual Federal Unemployment (FUTA) Tax Return – Filing and Deposit Requirements. Accessed online (April 20, 2023): https://www.irs.gov/taxtopics/tc759#:~:text=FUTA%20tax%20rate%3A%20The%20FUTA,federal%20or%20FUTA%20wage%20base
SUI Tax	\$427	Set at 3.05 percent of up to \$14,000, using all other industries with payroll less than \$500,000. Source: Wisconsin Department of Workforce Development. Unemployment Insurance 2023 Tax Rates. Accessed online (April 20, 2023): https://dwd.wisconsin.gov/ui/employers/taxrates.htm
Workers Comp	1.44%	Workers compensation as a percent of wages and salaries and paid leave. Source: Bureau of Labor Statistics. December 2022. Employer Costs of Employee Compensation – December 2022. Table 1, Civilian Workers Category.
Health insurance	\$4,218	BLS hourly insurance for health care and social assistance group multiplied by 2,080 hours and adjusted for differences in offer and take-up rates between Wisconsin HCBS-specific and nationwide data using the NCI-IDD survey information and a review of Wisconsin HCBS provider survey data collected for minimum payment rate development purposes. BLS’ definition of insurance encompasses life, health, and short- and long-term disability costs. Source: U.S. Bureau of Labor Statistics. (December 2022). Economic News Release, Table 2. Employer Costs for Employee Compensation for civilian workers by occupational and industry group.
Retirement	1.68%	BLS-defined contribution retirement as a percent of wages and salaries and paid leave adjusted for differences in the percentage of employers offering sponsored retirement plans in Wisconsin HCBS-specific and nationwide data using the NCI-IDD survey information and a review of Wisconsin HCBS provider survey data collected for minimum payment rate development purposes. Source: Bureau of Labor Statistics. December 2022. Employer Costs of Employee Compensation – December 2022. Table 1, Civilian Workers Category.

The detailed calculations related to the ERE percentage are shown by provider group in Appendix B.

3. Vehicle Costs – Residential Care

The IRM’s transportation expense component reflects vehicle expenses; staff time for transporting members is included in the staffing assumptions described in Appendix A. The per diem minimum payment rates calculated for residential care services include non-emergency transportation for members as those transportation services may not be billed separately for the services under analysis.

Transportation costs vary by setting, with expenses spread across all billable units of a claim in the same way that the transportation time is incorporated into the rate models. The transportation cost assumptions are as follows:

- AFH and CBRF <=8: 100 miles per resident per month (no variance by tier). We multiplied the number of miles by the 2023 federal mileage reimbursement allowance of \$0.655 per mile. This approach assumes that the federal mileage reimbursement would be sufficient to cover the cost of either employee-owned or provider-owned vehicles.

- CBRF > 8: For Tier 1, we used the estimated per diem cost of a car assuming 10,000 miles per year (without lift). For Tiers 2-3, we used the estimated per diem cost of one van / residence / 8 individuals, assuming 20,000 miles total per year blended with and without lift.
- RCAC: Estimated cost of one van per 10 individuals, assuming 20,000 miles total per year (without lift).

When using direct vehicle cost to develop the transportation allowance, we considered the cost of a vehicle and its expected longevity, insurance and registration, gas prices and basic vehicle maintenance, including oil changes, brake replacement, tire replacement and rotation, battery replacement and air filter replacement.

4. Administration / Program Support / Overhead

The administrative cost factor is intended to account for the following types of costs:

- **Administrative-related expenses** – Generally, administrative-related expenses would include all expenses incurred by the provider entity necessary to support the provision of services but not directly related to providing services to individuals. These expenses exclude transportation, wages, and employee-related expenses for direct care, and may include, but not be limited to:
 - Salaries and wages, and related employee benefits for employees or contractors that are not clinical / direct service workers or first- and second- line supervisors of direct service workers
 - Liability and other insurance
 - Licenses and taxes
 - Legal and audit fees
 - Accounting and payroll services
 - Billing and collection services
 - Bank service charges and fees
 - Information technology
 - Telephone and other communication expenses
 - Office and other supplies including postage
 - Accreditation expenses, dues, memberships, and subscriptions
 - Meeting and administrative travel related expenses
 - Training and employee development expenses, including related travel
 - Human resources, including background checks and other recruiting expenses
 - Community education
 - Marketing / advertising
 - Interest expense and financing fees
 - Facility and equipment expense and related utilities (excluding room and board)
 - Vehicle and other transportation expenses not related to transporting individuals receiving services or transporting employees to provide services to individuals
 - Board of director-related expenses
- **Program support costs** – include supplies, materials, and equipment necessary to support service delivery

We used a 15.0% administrative cost rate for residential care and 10% for SHC services. We reviewed Wisconsin HCBS provider survey data but did not use it directly to establish this assumption as the range of administrative and program support costs as a percentage of total costs (excluding room and board) varied widely. Additionally, data reported by many providers resulted in percentages that appeared higher than expected for administrative costs as defined in the survey (e.g., over 30%).

5. Considerations for SHC Non-Agency Rate

According to DHS, the non-agency SHC minimum payment rate for self-direction is assumed to be lower than the agency-based minimum payment rate after excluding the below rate components and sub-elements at DHS' direction. It is our understanding that these exclusions are made to replicate the current payment structure in the marketplace as, per DHS, almost all non-agency services are self-directed.

- PTO allowance
- Employee turnover rate
- ERE
 - Payroll taxes (FICA, FUTA, SUI)
 - Workers compensation insurance contributions
 - Health insurance
 - Retirement contributions
- DSP supervisor time
- Administrative cost, program support and other overhead expenditures

For the purpose of calculating the fiscal impact of the non-agency minimum rate, we assumed that MCOs would need to increase members' Self-Directed Supports (SDS) budgets (outside of the minimum rate paid to providers) to reflect continued payment of payroll taxes (FICA, FUTA, SUI) and workers compensation insurance contributions.

D. RESIDENTIAL ACUITY TIER DEFINITIONS AND THEIR USE BY SETTING

DHS developed residential acuity tiers based on stakeholder feedback, staffing input from Kaphengst Consulting LLC, and Milliman analysis of the relationship between Long Term Care Functional Screen elements and CY 2021 provider reimbursement. Figure 11 provides a summary of the resulting Tier 1, 2 and 3 functional screen value definitions.

FIGURE 11: RESIDENTIAL CARE TIER 1-3 DEFINITIONS

TIER 1	TIER 2	TIER 3
<ul style="list-style-type: none"> ▪ WANDERING = 0 ▪ SELF_INJURIOUS = 0 ▪ SELF_INJURIOUS = 1 <ul style="list-style-type: none"> - Weekly intervention or less ▪ OFFENSIVE / VIOLENT = 0 ▪ OFFENSIVE / VIOLENT = 1 <ul style="list-style-type: none"> - Weekly intervention or less 	<ul style="list-style-type: none"> ▪ WANDERING = 1 <ul style="list-style-type: none"> - Daytime wandering but sleeps nights ▪ SELF_INJURIOUS = 2 <ul style="list-style-type: none"> - Intervention 2 to 6 times per week or 1 to 2 times per day ▪ OFFENSIVE / VIOLENT = 2 <ul style="list-style-type: none"> - Intervention 2 to 6 times per week or 1 to 2 times per day 	<ul style="list-style-type: none"> ▪ WANDERING = 2 <ul style="list-style-type: none"> - Wanders during night or both day and night ▪ SELF_INJURIOUS = 3 <ul style="list-style-type: none"> - Intensive one-on-one interventions more than twice a day ▪ OFFENSIVE / VIOLENT = 3 <ul style="list-style-type: none"> - Intensive one-on-one interventions more than twice a day
	Dressing help – 2 (Helper present)	Transfer with Mechanical Lift – 'Y' (Yes)
	Toileting help – 2 (Helper present)	Tracheostomy exists – Not 'NR' (Even if independent)
	Ostomy exists – Not 'NR' (Even if independent)	Tube Feeding – Not 'NR' (Even if independent)
	Transfer help – 2 (Helper present)	Positioning in Bed or Chair – Not 'NR' (3+ times per day)

Once the tier definitions were established, DHS determined that certain levels of acuity were unlikely to occur in certain settings of care. Most individuals in RCACs have lower needs, so their minimum rate is associated with a single tier. Milliman analyzed the levels and variation in current MCO reimbursement to confirm the validity of this approach. Figure 12 illustrates the tiers created for each residential provider type.

FIGURE 12: SUMMARY OF RESIDENTIAL TIERS STRUCTURE BY SETTING

SETTING	SINGLE TIER	TIER 1 PER DIEM	TIER 2 PER DIEM	TIER 3 PER DIEM
AFH 1-2 (corporate owned)		X	X	X
AFH 3-4		X	X	X
CBRF 5-8		X	X	X
CBRF 9+		X	X	X
RCAC	X			

Appendix C provides the detailed rate buildup for the minimum payment rates for services included in this report.

V. Fiscal Impact Analysis

The fiscal impact analysis seeks to connect the minimum payment rate development phase with the implementation phase by estimating the additional cost required to fully fund the implementation of the HCBS minimum payment rates between July 1, 2024 and June 30, 2025. Figure 13 below shows our estimate of the combined state and federal funding needed to properly fund the Family Care, Family Care Partnership and PACE capitation rates to account for this new payment floor.

FIGURE 13: TOTAL ESTIMATED FISCAL IMPACT DEVELOPMENT

	FISCAL IMPACT (\$MILLIONS)
Supportive Home Care	\$37.3
Residential Care	232.1
Residential Day Programs Adjustment	-22.6
Residential Unit Limit Adjustment	11.3
Total Fiscal Impact	\$258.1

The following are important notes regarding the development of the fiscal impact:

- The residential day program adjustment is equivalent to -2% of certain MCO projected 2024 expenditures to account for reimbursement being reduced when individuals attend day treatment programs, consistent with current practices.
- The residential unit limit adjustment is equivalent to 1% of projected 2024 expenditures to account for our analysis limiting all monthly encounters to 31 units (i.e., days). The encounter data underlying the fiscal impact includes some experience reported as members receiving more than 31 units in a month, some portion of which may be consolidated into fewer units if the minimum rates are implemented. In our analysis, we limited all units to 31 in a month, which increased the calculated per diems and reduced the fiscal impact. To offset some of this reduction, which may remain outside the residential per diem in the future, we increased the fiscal impact by 1% of projected residential expenditures based on our analysis of the experience.
- We assumed that SHC services provided on a per diem basis increase by the same percentage as the corresponding service provided on a 15-minute basis.
- We calculated fiscal impacts for Tiers 1 and 2 for the AFH 1-2 setting using the overall SHC fiscal impact percentage as a proxy for the location and reimbursement methodology for owner-occupied family homes. We assumed that Tier 3 represents the majority of corporate-owned AFH 1-2 and calculated its fiscal impact in the same manner as for other residential settings.
- DHS expects that MCOs will continue to negotiate payment rates for members requiring 1:1 care and will monitor that MCOs are paying at least the minimum payment rate associated with Tier 3.
- The projected wage and fiscal impacts in this document include trending to CY 2024 levels. We do not anticipate that wages and fiscal impacts would vary significantly between CY 2024 and SFY 2025. Should DHS implement and maintain the minimum payment rate structure beyond CY 2025, we recommend updating the payment rates to incorporate updated wage and service utilization experience.

Figure 14 below provides additional information on the impact of minimum payment rates by setting.

FIGURE 14: ESTIMATED FISCAL IMPACT STATISTICS

RESIDENTIAL SETTING / PROVIDER TYPE	PERCENTAGE OF SERVICE UNITS IMPACTED	RATE INCREASE FOR IMPACTED SERVICES	RATE INCREASE ACROSS ALL SERVICES
AFH 1-2	69.4%	58.2%	20.2%
AFH 3-4	67.2%	49.5%	28.2%
CBRF<=8	61.0%	33.4%	16.4%
CBRF>8	68.3%	27.4%	16.4%
RCAC	41.0%	21.7%	6.8%
Total Residential Services	64.1%	40.5%	20.5%
Agency	76.6%	6.1%	4.3%
Non-Agency	75.1%	23.8%	16.3%
Total SHC Services	75.6%	16.2%	11.3%

A. METHODOLOGY

The fiscal impact analysis is based on CY 2022 functional screens, MCO encounter data and uses the tier definitions provided by DHS on March 22, 2023, and discussed in Section III of this report. We trended the base experience period to CY 2024 using an aggregate trend rate of 3.0%, consistent with Family Care and Family Care Partnership capitation rate development.

The residential care portion of the fiscal impact is based on the average monthly rate paid to providers for each member while the SHC are done at the claim level. Per DHS instructions and MCO-provided contracting information, we assumed SHC services were non-agency based when the unit cost found on a claim in the MCO encounter data was below thresholds specific to each MCO. DHS has indicated that majority of these services are self-directed.

We then compared the average encounter data provider payment to the corresponding minimum payment rate. If the average encounter-based payment was lower than the minimum payment rate, we included the difference in the total fiscal impact.

For purpose of calculating the fiscal impact for SHC non-agency minimum payment rates, we considered that some of the financial components excluded from the rate development process are typically still paid through SDS budgets, which MCOs would need to increase in order to meet the minimum payment requirements. These components are payroll taxes (FICA, FUTA, SUI) and workers compensation insurance contributions. This increase used for fiscal impact calculations was equivalent to a minimum payment rate of \$4.56 per 15 minute unit, which is \$0.48 higher than the actual non-agency minimum rate.

VI. Limitations and Data Reliance

The information contained in this report, including the appendices, has been prepared for the Wisconsin Department of Health Services (DHS). To the extent that the information contained in this report is provided to third parties, the report should be distributed in its entirety. Any user of the data must possess a certain level of expertise in actuarial science and healthcare modeling so as not to misinterpret the data presented.

The contents of this report are not intended to represent a legal or professional opinion or interpretation on any matters. Milliman makes no representations or warranties regarding the contents of this report to third parties. Similarly, third parties are instructed that they are to place no reliance upon this information prepared for DHS by Milliman that would result in the creation of any duty or liability under any theory of law by Milliman or its employees to third parties.

The analyses contained in this correspondence are technical in nature and are dependent upon specific assumptions and methods. No party should rely on these results without a thorough understanding of those assumptions and methods. Such an understanding may require consultation with qualified professionals.

We developed these proposed minimum payment rates using an independent rate model, which calculates rates based on the sum of independently determined rate inputs and components. Inputs are based on expected resources required to provide the service. It is certain that actual individual provider cost experience will not conform exactly to the assumptions used to develop these proposed minimum payments rates. Actual amounts will differ from projected amounts to the extent that actual experience deviates from expected experience.

We used Calendar Years 2021 and 2022 managed care encounter data and member functional screens, publicly available data sources, Wisconsin HCBS provider survey data, feedback from providers and other stakeholders, and staffing assumptions provided by DHS to develop the proposed minimum payment rates included in this correspondence and have accepted this data without audit. To the extent that the data and information provided is not accurate, or is not complete, the values provided in these exhibits may likewise be inaccurate or incomplete. The models, including all input, calculations, and output may not be appropriate for any other purpose.

Please note, projected wage and fiscal impacts in this document include trending to CY 2024 levels. We do not anticipate that wages and fiscal impacts would vary significantly between CY 2024 and SFY 2025. Should DHS implement and maintain the minimum payment rate structure beyond CY 2025, we recommend updating the payment rates to incorporate updated wage and service utilization experience.

Guidelines issued by the American Academy of Actuaries require actuaries to include their professional qualifications in all actuarial communications. The responsible actuaries for this analysis, Michael Cook and Mathieu Doucet, are members of the American Academy of Actuaries and meets the qualification standards for developing this report.

APPENDIX A

Appendix A
State of Wisconsin
Department of Health Services
ARPA HCBS Minimum Payment Rate Development
Assumptions Used in Payment Rate Development - Staffing Hours by Setting and Provider Type

Setting	AFH 1-2 - Corporate (2 residents assumed)			AFH 3-4 (4 residents assumed)			CBRF ≤8 (8 residents assumed)			CBRF >8 (10 residents assumed)			RCAC
	Tier 1	Tier 2	Tier 3	Tier 1	Tier 2	Tier 3	Tier 1	Tier 2	Tier 3	Tier 1	Tier 2	Tier 3	
DSP Base - DSP Works	148.0	148.0	148.0	148.0	148.0	148.0	148.0	148.0	148.0	120.0	120.0	129.3	108.0
DSP Base - Supervisor Works	20.0	20.0	20.0	20.0	20.0	20.0	20.0	20.0	20.0	20.0	20.0	20.0	20.0
DSP Intermittent	-	14.0	21.0	14.0	28.0	42.0	70.0	98.0	112.0	56.0	84.0	112.0	14.0
Activities Staff	-	-	-	-	-	-	-	-	-	20.0	20.0	20.0	-
Specialty Vehicle Driver	-	-	-	-	-	-	16.0	16.0	16.0	3.0	3.0	3.0	-
RN/BH Professional Oversight	-	0.5	1.0	-	1.0	2.0	-	2.0	4.0	-	2.5	5.0	0.1
DSP Supervisory Hours	14.8	16.2	16.9	16.2	17.6	19.0	21.8	24.6	26.0	19.6	22.4	26.1	12.2
Total	182.8	198.7	206.9	198.2	214.6	231.0	275.8	308.6	326.0	238.6	271.9	315.5	154.3

APPENDIX B

Appendix B1
State of Wisconsin
Department of Health Services
HCBS Minimum Payment Rate Development
Employee Related Expenses - 50th Percentile

	A	B	C	D	E	F	G	H	I	J	K
Direct Care Staff Category	Trended Wage	Annual Employee Salary	FICA	FUTA	SUI	Workers Comp	Health Insurance	Retirement	ERE per Employee	ERE Percentage	Annual Salary and ERE
Notes	Trended from 07/01/2021 to 07/01/2024 at a rate of 4.00%	A * 2080	A * 2080 * 7.65% up to \$162,900 taxable limit	6% of First \$7,000 Earned	B * 3.05% up to \$14,000 estimated taxable limit	B * 1.44%		B * 1.68%	SUM (C through H)	I / B	B * (1 + J)
Direct Care Staff Category 1	\$ 15.75	\$ 32,760	\$ 2,506	420	427	472	4,218	550	\$ 8,593	26.2%	\$ 41,353
Direct Care Staff Category 2	\$ 20.25	\$ 42,124	\$ 3,223	420	427	607	4,218	708	\$ 9,602	22.8%	\$ 51,726
Direct Care Staff Category 3	\$ 35.44	\$ 73,709	\$ 5,639	420	427	1,061	4,218	1,238	\$ 13,003	17.6%	\$ 86,712
Direct Care Staff Category 4	\$ 41.41	\$ 86,127	\$ 6,589	420	427	1,240	4,218	1,447	\$ 14,341	16.7%	\$ 100,468

Appendix B2
State of Wisconsin
Department of Health Services
HCBS Minimum Payment Rate Development
Employee Related Expenses - 75th Percentile

	A	B	C	D	E	F	G	H	I	J	K
Direct Care Staff Category	Trended Wage	Annual Employee Salary	FICA	FUTA	SUI	Workers Comp	Health Insurance	Retirement	ERE per Employee	ERE Percentage	Annual Salary and ERE
Notes	Trended from 07/01/2021 to 07/01/2024 at a rate of 4.00%	A * 2080	A * 2080 * 7.65% up to \$162,900 taxable limit	6% of First \$7,000 Earned	B * 3.05% up to \$14,000 estimated taxable limit	B * 1.44%		B * 1.68%	SUM (C through H)	I / B	B * (1 + J)
Direct Care Staff Category 1	\$ 16.61	\$ 34,555	\$ 2,643	420	427	498	4,218	581	\$ 8,787	25.4%	\$ 43,342
Direct Care Staff Category 2	\$ 25.85	\$ 53,778	\$ 4,114	420	427	774	4,218	903	\$ 10,857	20.2%	\$ 64,635
Direct Care Staff Category 3	\$ 38.45	\$ 79,974	\$ 6,118	420	427	1,152	4,218	1,344	\$ 13,678	17.1%	\$ 93,652
Direct Care Staff Category 4	\$ 43.32	\$ 90,105	\$ 6,893	420	427	1,298	4,218	1,514	\$ 14,769	16.4%	\$ 104,874

APPENDIX C

Appendix C
 State of Wisconsin
 Department of Health Services
 HCBS Minimum Payment Rate Development
 Exhibit 4 - AFH CO 1-2 Bed T1

Service Information

Service Code: AFH CO 1-2 Bed T1
 Reporting Units: Per Diem

Ref.	Description	DSP	Intermittent DSP	DSP Supervisor	Activities Staff	Specialty Vehicle Driver	RN / BH Professional Oversight	Total	Notes
A	Total Staff Hours per Week	148.00	-	34.80	-	-	-		The assumed number of weekly staff hours
B	Number of individuals served							2.00	The assumed number of clients in the home
C	PTO / training / conference time adjustment factor	8.7%	8.7%	8.7%	8.7%	8.7%	8.7%		Based on separate PTO build
D	Adjusted total hours of time per week	160.87	-	37.83	-	-	-		$D = A * (1 + C)$
E	Hourly wage	\$ 15.75	\$ 15.75	\$ 20.25	\$ 15.75	\$ 15.75	\$ 35.44		Based on separate wage build
F	Total wages expense per week	\$ 2,534	\$ 0	\$ 766	\$ 0	\$ 0	\$ 0		$F = D * E$
G	Holidays worked	10.00	10.00	10.00	10.00	10.00	10.00		10 holidays per year
H	Percent of non-holiday hours paid at time and a half	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		Based on assumptions
I	Percent of total hours paid at time and a half	2.7%	2.7%	2.7%	2.7%	2.7%	2.7%		$I = (365.25 * H + G) / 365.25$
J	Total direct care wage adjusted for overtime and holidays per week	\$ 2,568.42	\$ 0.00	\$ 776.56	\$ 0.00	\$ 0.00	\$ 0.00	\$ 3,344.98	$J = F * (1 - I) + F * I * 1.5$
K	Employee related expense (ERE) percentage	26.2%	26.2%	22.8%	26.2%	26.2%	17.6%		Based on separate ERE build
L	Total ERE expense per week	\$ 673.72	\$ 0.00	\$ 177.01	\$ 0.00	\$ 0.00	\$ 0.00	\$ 850.73	$L = J * K$
M	Mileage reimbursement or vehicle costs costs per week							\$ 30.14	Based on van build-up estimates
N	Medication costs							\$ 0.00	$N = \text{Medication Costs} * B * T$
O	Subtotal before administration / overhead / program support							\$ 4,225.86	$O = (J + L + M + N)$
P	Administration / program support / overhead percentage							15.0%	
Q	Administration / overhead / program support cost per week							\$ 745.74	$Q = (O * P) / (1 - P)$
R	Total cost per week							\$ 4,971.60	$R = O + Q$
S	Caseload efficiency							95.0%	
T	Units per week							7.00	
U	Per Diem Rate							\$ 373.80	$U = (((J + L + M + Q) / S) + N) / B / T$
Summary of Rate Model Components									
Ref.	Description							Total	Notes
AA	Direct Service Employee Salaries & Wages							\$ 251.50	
AB	Indirect Service Employee Salaries & Wages							\$ 0.00	
AC	Transportation Service Employee Salaries & Wages							\$ 0.00	
AD	Employee related expenses							\$ 63.96	
AE	Transportation & fleet vehicle expenses							\$ 2.27	
AF	Administration, program support & overhead							\$ 56.07	
AG	Total Rate							\$ 373.80	

Appendix C
 State of Wisconsin
 Department of Health Services
 HCBS Minimum Payment Rate Development
 Exhibit 4 - AFH CO 1-2 Bed T2

Service Information

Service Code: AFH CO 1-2 Bed T2
 Reporting Units: Per Diem

Ref.	Description	DSP	Intermittent DSP	DSP Supervisor	Activities Staff	Specialty Vehicle Driver	RN / BH Professional Oversight	Total	Notes
A	Total Staff Hours per Week	148.00	14.00	36.20	-	-	0.50		The assumed number of weekly staff hours
B	Number of individuals served							2.00	The assumed number of clients in the home
C	PTO / training / conference time adjustment factor	8.7%	8.7%	8.7%	8.7%	8.7%	8.7%		Based on separate PTO build
D	Adjusted total hours of time per week	160.87	15.22	39.35	-	-	0.54		$D = A * (1 + C)$
E	Hourly wage	\$ 15.75	\$ 15.75	\$ 20.25	\$ 15.75	\$ 15.75	\$ 35.44		Based on separate wage build
F	Total wages expense per week	\$ 2,534	\$ 240	\$ 797	\$ 0	\$ 0	\$ 19		$F = D * E$
G	Holidays worked	10.00	10.00	10.00	10.00	10.00	10.00		10 holidays per year
H	Percent of non-holiday hours paid at time and a half	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		Based on assumptions
I	Percent of total hours paid at time and a half	2.7%	2.7%	2.7%	2.7%	2.7%	2.7%		$I = (365.25 * H + G) / 365.25$
J	Total direct care wage adjusted for overtime and holidays per week	\$ 2,568.42	\$ 242.96	\$ 807.80	\$ 0.00	\$ 0.00	\$ 19.52	\$ 3,638.70	$J = F * (1 - I) + F * I * 1.5$
K	Employee related expense (ERE) percentage	26.2%	26.2%	22.8%	26.2%	26.2%	17.6%		Based on separate ERE build
L	Total ERE expense per week	\$ 673.72	\$ 63.73	\$ 184.13	\$ 0.00	\$ 0.00	\$ 3.44	\$ 925.03	$L = J * K$
M	Mileage reimbursement or vehicle costs costs per week							\$ 30.14	Based on van build-up estimates
N	Medication costs							\$ 0.00	$N = \text{Medication Costs} * B * T$
O	Subtotal before administration / overhead / program support							\$ 4,593.87	$O = (J + L + M + N)$
P	Administration / program support / overhead percentage							15.0%	
Q	Administration / overhead / program support cost per week							\$810.68	$Q = (O * P) / (1 - P)$
R	Total cost per week							\$5,404.56	$R = O + Q$
S	Caseload efficiency							95.0%	
T	Units per week							7.00	
U	Per Diem Rate							\$406.36	$U = (((J + L + M + Q) / S) + N) / B / T$
Ref.	Summary of Rate Model Components							Total	Notes
AA	Direct Service Employee Salaries & Wages							\$ 273.59	
AB	Indirect Service Employee Salaries & Wages							\$ 0.00	
AC	Transportation Service Employee Salaries & Wages							\$ 0.00	
AD	Employee related expenses							\$ 69.55	
AE	Transportation & fleet vehicle expenses							\$ 2.27	
AF	Administration, program support & overhead							\$ 60.95	
AG	Total Rate							\$406.36	

Appendix C
 State of Wisconsin
 Department of Health Services
 HCBS Minimum Payment Rate Development
 Exhibit 4 - AFH CO 1-2 Bed T3

Service Information

Service Code: AFH CO 1-2 Bed T3
 Reporting Units: Per Diem

Ref.	Description	DSP	Intermittent DSP	DSP Supervisor	Activities Staff	Specialty Vehicle Driver	RN / BH Professional Oversight	Total	Notes
A	Total Staff Hours per Week	148.00	21.00	36.90	-	-	1.00		The assumed number of weekly staff hours
B	Number of individuals served							2.00	The assumed number of clients in the home
C	PTO / training / conference time adjustment factor	8.7%	8.7%	8.7%	8.7%	8.7%	8.7%		Based on separate PTO build
D	Adjusted total hours of time per week	160.87	22.83	40.11	-	-	1.09		$D = A * (1 + C)$
E	Hourly wage	\$ 15.75	\$ 15.75	\$ 20.25	\$ 15.75	\$ 15.75	\$ 35.44		Based on separate wage build
F	Total wages expense per week	\$ 2,534	\$ 360	\$ 812	\$ 0	\$ 0	\$ 39		$F = D * E$
G	Holidays worked	10.00	10.00	10.00	10.00	10.00	10.00		10 holidays per year
H	Percent of non-holiday hours paid at time and a half	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		Based on assumptions
I	Percent of total hours paid at time and a half	2.7%	2.7%	2.7%	2.7%	2.7%	2.7%		$I = (365.25 * H + G) / 365.25$
J	Total direct care wage adjusted for overtime and holidays per week	\$ 2,568.42	\$ 364.44	\$ 823.42	\$ 0.00	\$ 0.00	\$ 39.05	\$ 3,795.33	$J = F * (1 - I) + F * I * 1.5$
K	Employee related expense (ERE) percentage	26.2%	26.2%	22.8%	26.2%	26.2%	17.6%		Based on separate ERE build
L	Total ERE expense per week	\$ 673.72	\$ 95.60	\$ 187.69	\$ 0.00	\$ 0.00	\$ 6.89	\$ 963.90	$L = J * K$
M	Mileage reimbursement or vehicle costs costs per week							\$ 30.14	Based on van build-up estimates
N	Medication costs							\$ 0.00	$N = \text{Medication Costs} * B * T$
O	Subtotal before administration / overhead / program support							\$ 4,789.37	$O = (J + L + M + N)$
P	Administration / program support / overhead percentage							15.0%	
Q	Administration / overhead / program support cost per week							\$845.18	$Q = (O * P) / (1 - P)$
R	Total cost per week							\$5,634.55	$R = O + Q$
S	Caseload efficiency							95.0%	
T	Units per week							7.00	
U	Per Diem Rate							\$423.65	$U = (((J + L + M + Q) / S) + N) / B / T$
Summary of Rate Model Components									
Ref.	Description							Total	Notes
AA	Direct Service Employee Salaries & Wages							\$ 285.36	
AB	Indirect Service Employee Salaries & Wages							\$ 0.00	
AC	Transportation Service Employee Salaries & Wages							\$ 0.00	
AD	Employee related expenses							\$ 72.47	
AE	Transportation & fleet vehicle expenses							\$ 2.27	
AF	Administration, program support & overhead							\$ 63.55	
AG	Total Rate							\$423.65	

Appendix C
 State of Wisconsin
 Department of Health Services
 HCBS Minimum Payment Rate Development
 Exhibit 4 - AFH CO 3-4 Bed T1

Service Information

Service Code: AFH CO 3-4 Bed T1
 Reporting Units: Per Diem

Ref.	Description	DSP	Intermittent DSP	DSP Supervisor	Activities Staff	Specialty Vehicle Driver	RN / BH Professional Oversight	Total	Notes
A	Total Staff Hours per Week	148.00	14.00	36.20	-	-	-		The assumed number of weekly staff hours
B	Number of individuals served							4.00	The assumed number of clients in the home
C	PTO / training / conference time adjustment factor	8.7%	8.7%	8.7%	8.7%	8.7%	8.7%		Based on separate PTO build
D	Adjusted total hours of time per week	160.87	15.22	39.35	-	-	-		$D = A * (1 + C)$
E	Hourly wage	\$ 15.75	\$ 15.75	\$ 20.25	\$ 15.75	\$ 15.75	\$ 35.44		Based on separate wage build
F	Total wages expense per week	\$ 2,534	\$ 240	\$ 797	\$ 0	\$ 0	\$ 0		$F = D * E$
G	Holidays worked	10.00	10.00	10.00	10.00	10.00	10.00		10 holidays per year
H	Percent of non-holiday hours paid at time and a half	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		Based on assumptions
I	Percent of total hours paid at time and a half	2.7%	2.7%	2.7%	2.7%	2.7%	2.7%		$I = (365.25 * H + G) / 365.25$
J	Total direct care wage adjusted for overtime and holidays per week	\$ 2,568.42	\$ 242.96	\$ 807.80	\$ 0.00	\$ 0.00	\$ 0.00	\$ 3,619.18	$J = F * (1 - I) + F * I * 1.5$
K	Employee related expense (ERE) percentage	26.2%	26.2%	22.8%	26.2%	26.2%	17.6%		Based on separate ERE build
L	Total ERE expense per week	\$ 673.72	\$ 63.73	\$ 184.13	\$ 0.00	\$ 0.00	\$ 0.00	\$ 921.58	$L = J * K$
M	Mileage reimbursement or vehicle costs costs per week							\$ 60.29	Based on van build-up estimates
N	Medication costs							\$ 0.00	$N = \text{Medication Costs} * B * T$
O	Subtotal before administration / overhead / program support							\$ 4,601.05	$O = (J + L + M + N)$
P	Administration / program support / overhead percentage							15.0%	
Q	Administration / overhead / program support cost per week							\$811.95	$Q = (O * P) / (1 - P)$
R	Total cost per week							\$5,413.00	$R = O + Q$
S	Caseload efficiency							95.0%	
T	Units per week							7.00	
U	Per Diem Rate							\$203.50	$U = (((J + L + M + Q) / S) + N) / B / T$
Ref.	Summary of Rate Model Components							Total	Notes
AA	Direct Service Employee Salaries & Wages							\$ 136.06	
AB	Indirect Service Employee Salaries & Wages							\$ 0.00	
AC	Transportation Service Employee Salaries & Wages							\$ 0.00	
AD	Employee related expenses							\$ 34.65	
AE	Transportation & fleet vehicle expenses							\$ 2.27	
AF	Administration, program support & overhead							\$ 30.52	
AG	Total Rate							\$203.50	

Appendix C
 State of Wisconsin
 Department of Health Services
 HCBS Minimum Payment Rate Development
 Exhibit 4 - AFH CO 3-4 Bed T2

Service Information

Service Code: AFH CO 3-4 Bed T2
 Reporting Units: Per Diem

Ref.	Description	DSP	Intermittent DSP	DSP Supervisor	Activities Staff	Specialty Vehicle Driver	RN / BH Professional Oversight	Total	Notes
A	Total Staff Hours per Week	148.00	28.00	37.60	-	-	1.00		The assumed number of weekly staff hours
B	Number of individuals served							4.00	The assumed number of clients in the home
C	PTO / training / conference time adjustment factor	8.7%	8.7%	8.7%	8.7%	8.7%	8.7%		Based on separate PTO build
D	Adjusted total hours of time per week	160.87	30.44	40.87	-	-	1.09		$D = A * (1 + C)$
E	Hourly wage	\$ 15.75	\$ 15.75	\$ 20.25	\$ 15.75	\$ 15.75	\$ 35.44		Based on separate wage build
F	Total wages expense per week	\$ 2,534	\$ 479	\$ 828	\$ 0	\$ 0	\$ 39		$F = D * E$
G	Holidays worked	10.00	10.00	10.00	10.00	10.00	10.00		10 holidays per year
H	Percent of non-holiday hours paid at time and a half	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		Based on assumptions
I	Percent of total hours paid at time and a half	2.7%	2.7%	2.7%	2.7%	2.7%	2.7%		$I = (365.25 * H + G) / 365.25$
J	Total direct care wage adjusted for overtime and holidays per week	\$ 2,568.42	\$ 485.92	\$ 839.04	\$ 0.00	\$ 0.00	\$ 39.05	\$ 3,932.43	$J = F * (1 - I) + F * I * 1.5$
K	Employee related expense (ERE) percentage	26.2%	26.2%	22.8%	26.2%	26.2%	17.6%		Based on separate ERE build
L	Total ERE expense per week	\$ 673.72	\$ 127.46	\$ 191.25	\$ 0.00	\$ 0.00	\$ 6.89	\$ 999.32	$L = J * K$
M	Mileage reimbursement or vehicle costs costs per week							\$ 60.29	Based on van build-up estimates
N	Medication costs							\$ 0.00	$N = \text{Medication Costs} * B * T$
O	Subtotal before administration / overhead / program support							\$ 4,992.04	$O = (J + L + M + N)$
P	Administration / program support / overhead percentage							15.0%	
Q	Administration / overhead / program support cost per week							\$880.95	$Q = (O * P) / (1 - P)$
R	Total cost per week							\$5,872.99	$R = O + Q$
S	Caseload efficiency							95.0%	
T	Units per week							7.00	
U	Per Diem Rate							\$220.79	$U = (((J + L + M + Q) / S) + N) / B / T$
Ref.	Summary of Rate Model Components							Total	Notes
AA	Direct Service Employee Salaries & Wages							\$ 147.84	
AB	Indirect Service Employee Salaries & Wages							\$ 0.00	
AC	Transportation Service Employee Salaries & Wages							\$ 0.00	
AD	Employee related expenses							\$ 37.57	
AE	Transportation & fleet vehicle expenses							\$ 2.27	
AF	Administration, program support & overhead							\$ 33.12	
AG	Total Rate							\$220.79	

Appendix C
 State of Wisconsin
 Department of Health Services
 HCBS Minimum Payment Rate Development
 Exhibit 4 - AFH CO 3-4 Bed T3

Service Information

Service Code: AFH CO 3-4 Bed T3
 Reporting Units: Per Diem

Ref.	Description	DSP	Intermittent DSP	DSP Supervisor	Activities Staff	Specialty Vehicle Driver	RN / BH Professional Oversight	Total	Notes
A	Total Staff Hours per Week	148.00	42.00	39.00	-	-	2.00		The assumed number of weekly staff hours
B	Number of individuals served							4.00	The assumed number of clients in the home
C	PTO / training / conference time adjustment factor	8.7%	8.7%	8.7%	8.7%	8.7%	8.7%		Based on separate PTO build
D	Adjusted total hours of time per week	160.87	45.65	42.39	-	-	2.17		$D = A * (1 + C)$
E	Hourly wage	\$ 15.75	\$ 15.75	\$ 20.25	\$ 15.75	\$ 15.75	\$ 35.44		Based on separate wage build
F	Total wages expense per week	\$ 2,534	\$ 719	\$ 859	\$ 0	\$ 0	\$ 77		$F = D * E$
G	Holidays worked	10.00	10.00	10.00	10.00	10.00	10.00		10 holidays per year
H	Percent of non-holiday hours paid at time and a half	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		Based on assumptions
I	Percent of total hours paid at time and a half	2.7%	2.7%	2.7%	2.7%	2.7%	2.7%		$I = (365.25 * H + G) / 365.25$
J	Total direct care wage adjusted for overtime and holidays per week	\$ 2,568.42	\$ 728.88	\$ 870.28	\$ 0.00	\$ 0.00	\$ 78.09	\$ 4,245.67	$J = F * (1 - I) + F * I * 1.5$
K	Employee related expense (ERE) percentage	26.2%	26.2%	22.8%	26.2%	26.2%	17.6%		Based on separate ERE build
L	Total ERE expense per week	\$ 673.72	\$ 191.19	\$ 198.37	\$ 0.00	\$ 0.00	\$ 13.78	\$ 1,077.06	$L = J * K$
M	Mileage reimbursement or vehicle costs costs per week							\$ 60.29	Based on van build-up estimates
N	Medication costs							\$ 0.00	$N = \text{Medication Costs} * B * T$
O	Subtotal before administration / overhead / program support							\$ 5,383.02	$O = (J + L + M + N)$
P	Administration / program support / overhead percentage							15.0%	
Q	Administration / overhead / program support cost per week							\$949.95	$Q = (O * P) / (1 - P)$
R	Total cost per week							\$6,332.97	$R = O + Q$
S	Caseload efficiency							95.0%	
T	Units per week							7.00	
U	Per Diem Rate							\$238.08	$U = (((J + L + M + Q) / S) + N) / B / T$
Ref.	Summary of Rate Model Components							Total	Notes
AA	Direct Service Employee Salaries & Wages							\$ 159.61	
AB	Indirect Service Employee Salaries & Wages							\$ 0.00	
AC	Transportation Service Employee Salaries & Wages							\$ 0.00	
AD	Employee related expenses							\$ 40.49	
AE	Transportation & fleet vehicle expenses							\$ 2.27	
AF	Administration, program support & overhead							\$ 35.71	
AG	Total Rate							\$238.08	

Appendix C
 State of Wisconsin
 Department of Health Services
 HCBS Minimum Payment Rate Development
 Exhibit 4 - CBRF <= 8 T1

Service Information

Service Code: CBRF <= 8 T1
 Reporting Units: Per Diem

Ref.	Description	DSP	Intermittent DSP	DSP Supervisor	Activities Staff	Specialty Vehicle Driver	RN / BH Professional Oversight	Total	Notes
A	Total Staff Hours per Week	148.00	70.00	41.80	-	16.00	-		The assumed number of weekly staff hours
B	Number of individuals served							8.00	The assumed number of clients in the home
C	PTO / training / conference time adjustment factor	8.7%	8.7%	8.7%	8.7%	8.7%	8.7%		Based on separate PTO build
D	Adjusted total hours of time per week	160.87	76.09	45.44	-	17.39	-		$D = A * (1 + C)$
E	Hourly wage	\$ 15.75	\$ 15.75	\$ 20.25	\$ 15.75	\$ 15.75	\$ 35.44		Based on separate wage build
F	Total wages expense per week	\$ 2,534	\$ 1,198	\$ 920	\$ 0	\$ 274	\$ 0		$F = D * E$
G	Holidays worked	10.00	10.00	10.00	10.00	10.00	10.00		10 holidays per year
H	Percent of non-holiday hours paid at time and a half	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		Based on assumptions
I	Percent of total hours paid at time and a half	2.7%	2.7%	2.7%	2.7%	2.7%	2.7%		$I = (365.25 * H + G) / 365.25$
J	Total direct care wage adjusted for overtime and holidays per week	\$ 2,568.42	\$ 1,214.79	\$ 932.76	\$ 0.00	\$ 277.67	\$ 0.00	\$ 4,993.65	$J = F * (1 - I) + F * I * 1.5$
K	Employee related expense (ERE) percentage	26.2%	26.2%	22.8%	26.2%	26.2%	17.6%		Based on separate ERE build
L	Total ERE expense per week	\$ 673.72	\$ 318.65	\$ 212.61	\$ 0.00	\$ 72.83	\$ 0.00	\$ 1,277.82	$L = J * K$
M	Mileage reimbursement or vehicle costs costs per week							\$ 120.58	Based on van build-up estimates
N	Medication costs							\$ 0.00	$N = \text{Medication Costs} * B * T$
O	Subtotal before administration / overhead / program support							\$ 6,392.05	$O = (J + L + M + N)$
P	Administration / program support / overhead percentage							15.0%	
Q	Administration / overhead / program support cost per week							\$ 1,128.01	$Q = (O * P) / (1 - P)$
R	Total cost per week							\$ 7,520.06	$R = O + Q$
S	Caseload efficiency							95.0%	
T	Units per week							7.00	
U	Per Diem Rate							\$ 141.35	$U = (((J + L + M + Q) / S) + N) / B / T$
Ref.	Summary of Rate Model Components							Total	Notes
AA	Direct Service Employee Salaries & Wages							\$ 93.87	
AB	Indirect Service Employee Salaries & Wages							\$ 0.00	
AC	Transportation Service Employee Salaries & Wages							\$ 0.00	
AD	Employee related expenses							\$ 24.02	
AE	Transportation & fleet vehicle expenses							\$ 2.27	
AF	Administration, program support & overhead							\$ 21.20	
AG	Total Rate							\$ 141.35	

Appendix C
 State of Wisconsin
 Department of Health Services
 HCBS Minimum Payment Rate Development
 Exhibit 4 - CBRF <= 8 T2

Service Information

Service Code: CBRF <= 8 T2
 Reporting Units: Per Diem

Ref.	Description	DSP	Intermittent DSP	DSP Supervisor	Activities Staff	Specialty Vehicle Driver	RN / BH Professional Oversight	Total	Notes
A	Total Staff Hours per Week	148.00	98.00	44.60	-	16.00	2.00		The assumed number of weekly staff hours
B	Number of individuals served							8.00	The assumed number of clients in the home
C	PTO / training / conference time adjustment factor	8.7%	8.7%	8.7%	8.7%	8.7%	8.7%		Based on separate PTO build
D	Adjusted total hours of time per week	160.87	106.52	48.48	-	17.39	2.17		$D = A * (1 + C)$
E	Hourly wage	\$ 15.75	\$ 15.75	\$ 20.25	\$ 15.75	\$ 15.75	\$ 35.44		Based on separate wage build
F	Total wages expense per week	\$ 2,534	\$ 1,678	\$ 982	\$ 0	\$ 274	\$ 77		$F = D * E$
G	Holidays worked	10.00	10.00	10.00	10.00	10.00	10.00		10 holidays per year
H	Percent of non-holiday hours paid at time and a half	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		Based on assumptions
I	Percent of total hours paid at time and a half	2.7%	2.7%	2.7%	2.7%	2.7%	2.7%		$I = (365.25 * H + G) / 365.25$
J	Total direct care wage adjusted for overtime and holidays per week	\$ 2,568.42	\$ 1,700.71	\$ 995.25	\$ 0.00	\$ 277.67	\$ 78.09	\$ 5,620.14	$J = F * (1 - I) + F * I * 1.5$
K	Employee related expense (ERE) percentage	26.2%	26.2%	22.8%	26.2%	26.2%	17.6%		Based on separate ERE build
L	Total ERE expense per week	\$ 673.72	\$ 446.11	\$ 226.86	\$ 0.00	\$ 72.83	\$ 13.78	\$ 1,433.30	$L = J * K$
M	Mileage reimbursement or vehicle costs costs per week							\$ 120.58	Based on van build-up estimates
N	Medication costs							\$ 0.00	$N = \text{Medication Costs} * B * T$
O	Subtotal before administration / overhead / program support							\$ 7,174.02	$O = (J + L + M + N)$
P	Administration / program support / overhead percentage							15.0%	
Q	Administration / overhead / program support cost per week							\$ 1,266.00	$Q = (O * P) / (1 - P)$
R	Total cost per week							\$ 8,440.02	$R = O + Q$
S	Caseload efficiency							95.0%	
T	Units per week							7.00	
U	Per Diem Rate							\$ 158.65	$U = (((J + L + M + Q) / S) + N) / B / T$
Ref.	Summary of Rate Model Components							Total	Notes
AA	Direct Service Employee Salaries & Wages							\$ 105.64	
AB	Indirect Service Employee Salaries & Wages							\$ 0.00	
AC	Transportation Service Employee Salaries & Wages							\$ 0.00	
AD	Employee related expenses							\$ 26.94	
AE	Transportation & fleet vehicle expenses							\$ 2.27	
AF	Administration, program support & overhead							\$ 23.80	
AG	Total Rate							\$ 158.65	

Appendix C
 State of Wisconsin
 Department of Health Services
 HCBS Minimum Payment Rate Development
 Exhibit 4 - CBRF <= 8 T3

Service Information

Service Code: CBRF <= 8 T3
 Reporting Units: Per Diem

Ref.	Description	DSP	Intermittent DSP	DSP Supervisor	Activities Staff	Specialty Vehicle Driver	RN / BH Professional Oversight	Total	Notes
A	Total Staff Hours per Week	148.00	112.00	46.00	-	16.00	4.00		The assumed number of weekly staff hours
B	Number of individuals served							8.00	The assumed number of clients in the home
C	PTO / training / conference time adjustment factor	8.7%	8.7%	8.7%	8.7%	8.7%	8.7%		Based on separate PTO build
D	Adjusted total hours of time per week	160.87	121.74	50.00	-	17.39	4.35		$D = A * (1 + C)$
E	Hourly wage	\$ 15.75	\$ 15.75	\$ 20.25	\$ 15.75	\$ 15.75	\$ 35.44		Based on separate wage build
F	Total wages expense per week	\$ 2,534	\$ 1,917	\$ 1,013	\$ 0	\$ 274	\$ 154		$F = D * E$
G	Holidays worked	10.00	10.00	10.00	10.00	10.00	10.00		10 holidays per year
H	Percent of non-holiday hours paid at time and a half	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		Based on assumptions
I	Percent of total hours paid at time and a half	2.7%	2.7%	2.7%	2.7%	2.7%	2.7%		$I = (365.25 * H + G) / 365.25$
J	Total direct care wage adjusted for overtime and holidays per week	\$ 2,568.42	\$ 1,943.67	\$ 1,026.49	\$ 0.00	\$ 277.67	\$ 156.19	\$ 5,972.43	$J = F * (1 - I) + F * I * 1.5$
K	Employee related expense (ERE) percentage	26.2%	26.2%	22.8%	26.2%	26.2%	17.6%		Based on separate ERE build
L	Total ERE expense per week	\$ 673.72	\$ 509.84	\$ 233.98	\$ 0.00	\$ 72.83	\$ 27.55	\$ 1,517.93	$L = J * K$
M	Mileage reimbursement or vehicle costs costs per week							\$ 120.58	Based on van build-up estimates
N	Medication costs							\$ 0.00	$N = \text{Medication Costs} * B * T$
O	Subtotal before administration / overhead / program support							\$ 7,610.94	$O = (J + L + M + N)$
P	Administration / program support / overhead percentage							15.0%	
Q	Administration / overhead / program support cost per week							\$ 1,343.11	$Q = (O * P) / (1 - P)$
R	Total cost per week							\$ 8,954.05	$R = O + Q$
S	Caseload efficiency							95.0%	
T	Units per week							7.00	
U	Per Diem Rate							\$ 168.31	$U = (((J + L + M + Q) / S) + N) / B / T$
Ref.	Summary of Rate Model Components							Total	Notes
AA	Direct Service Employee Salaries & Wages							\$ 112.26	
AB	Indirect Service Employee Salaries & Wages							\$ 0.00	
AC	Transportation Service Employee Salaries & Wages							\$ 0.00	
AD	Employee related expenses							\$ 28.53	
AE	Transportation & fleet vehicle expenses							\$ 2.27	
AF	Administration, program support & overhead							\$ 25.25	
AG	Total Rate							\$ 168.31	

Appendix C
 State of Wisconsin
 Department of Health Services
 HCBS Minimum Payment Rate Development
 Exhibit 4 - CBRF > 8 T1

Service Information

Service Code: CBRF > 8 T1
 Reporting Units: Per Diem

Ref.	Description	DSP	Intermittent DSP	DSP Supervisor	Activities Staff	Specialty Vehicle Driver	RN / BH Professional Oversight	Total	Notes
A	Total Staff Hours per Week	120.00	56.00	39.60	20.00	3.00	-		The assumed number of weekly staff hours
B	Number of individuals served							10.00	The assumed number of clients in the home
C	PTO / training / conference time adjustment factor	8.7%	8.7%	8.7%	8.7%	8.7%	8.7%		Based on separate PTO build
D	Adjusted total hours of time per week	130.44	60.87	43.04	21.74	3.26	-		$D = A * (1 + C)$
E	Hourly wage	\$ 15.75	\$ 15.75	\$ 20.25	\$ 15.75	\$ 15.75	\$ 35.44		Based on separate wage build
F	Total wages expense per week	\$ 2,054	\$ 959	\$ 872	\$ 342	\$ 51	\$ 0		$F = D * E$
G	Holidays worked	10.00	10.00	10.00	10.00	10.00	10.00		10 holidays per year
H	Percent of non-holiday hours paid at time and a half	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		Based on assumptions
I	Percent of total hours paid at time and a half	2.7%	2.7%	2.7%	2.7%	2.7%	2.7%		$I = (365.25 * H + G) / 365.25$
J	Total direct care wage adjusted for overtime and holidays per week	\$ 2,082.50	\$ 971.83	\$ 883.67	\$ 347.08	\$ 52.06	\$ 0.00	\$ 4,337.16	$J = F * (1 - I) + F * I * 1.5$
K	Employee related expense (ERE) percentage	26.2%	26.2%	22.8%	26.2%	26.2%	17.6%		Based on separate ERE build
L	Total ERE expense per week	\$ 546.26	\$ 254.92	\$ 201.42	\$ 91.04	\$ 13.66	\$ 0.00	\$ 1,107.31	$L = J * K$
M	Mileage reimbursement or vehicle costs costs per week							\$ 250.37	Based on van build-up estimates
N	Medication costs							\$ 0.00	$N = \text{Medication Costs} * B * T$
O	Subtotal before administration / overhead / program support							\$ 5,694.84	$O = (J + L + M + N)$
P	Administration / program support / overhead percentage							15.0%	
Q	Administration / overhead / program support cost per week							\$ 1,004.97	$Q = (O * P) / (1 - P)$
R	Total cost per week							\$ 6,699.81	$R = O + Q$
S	Caseload efficiency							95.0%	
T	Units per week							7.00	
U	Per Diem Rate							\$ 100.75	$U = (((J + L + M + Q) / S) + N) / B / T$
Ref.	Summary of Rate Model Components							Total	Notes
AA	Direct Service Employee Salaries & Wages							\$ 65.22	
AB	Indirect Service Employee Salaries & Wages							\$ 0.00	
AC	Transportation Service Employee Salaries & Wages							\$ 0.00	
AD	Employee related expenses							\$ 16.65	
AE	Transportation & fleet vehicle expenses							\$ 3.77	
AF	Administration, program support & overhead							\$ 15.11	
AG	Total Rate							\$ 100.75	

Appendix C
 State of Wisconsin
 Department of Health Services
 HCBS Minimum Payment Rate Development
 Exhibit 4 - CBRF > 8 T2

Service Information

Service Code: CBRF > 8 T2
 Reporting Units: Per Diem

Ref.	Description	DSP	Intermittent DSP	DSP Supervisor	Activities Staff	Specialty Vehicle Driver	RN / BH Professional Oversight	Total	Notes
A	Total Staff Hours per Week	120.00	84.00	42.40	20.00	3.00	2.50		The assumed number of weekly staff hours
B	Number of individuals served							10.00	The assumed number of clients in the home
C	PTO / training / conference time adjustment factor	8.7%	8.7%	8.7%	8.7%	8.7%	8.7%		Based on separate PTO build
D	Adjusted total hours of time per week	130.44	91.31	46.09	21.74	3.26	2.72		$D = A * (1 + C)$
E	Hourly wage	\$ 15.75	\$ 15.75	\$ 20.25	\$ 15.75	\$ 15.75	\$ 35.44		Based on separate wage build
F	Total wages expense per week	\$ 2,054	\$ 1,438	\$ 933	\$ 342	\$ 51	\$ 96		$F = D * E$
G	Holidays worked	10.00	10.00	10.00	10.00	10.00	10.00		10 holidays per year
H	Percent of non-holiday hours paid at time and a half	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		Based on assumptions
I	Percent of total hours paid at time and a half	2.7%	2.7%	2.7%	2.7%	2.7%	2.7%		$I = (365.25 * H + G) / 365.25$
J	Total direct care wage adjusted for overtime and holidays per week	\$ 2,082.50	\$ 1,457.75	\$ 946.15	\$ 347.08	\$ 52.06	\$ 97.62	\$ 4,983.17	$J = F * (1 - I) + F * I * 1.5$
K	Employee related expense (ERE) percentage	26.2%	26.2%	22.8%	26.2%	26.2%	17.6%		Based on separate ERE build
L	Total ERE expense per week	\$ 546.26	\$ 382.38	\$ 215.67	\$ 91.04	\$ 13.66	\$ 17.22	\$ 1,266.23	$L = J * K$
M	Mileage reimbursement or vehicle costs costs per week							\$ 255.16	Based on van build-up estimates
N	Medication costs							\$ 0.00	$N = \text{Medication Costs} * B * T$
O	Subtotal before administration / overhead / program support							\$ 6,504.57	$O = (J + L + M + N)$
P	Administration / program support / overhead percentage							15.0%	
Q	Administration / overhead / program support cost per week							\$ 1,147.86	$Q = (O * P) / (1 - P)$
R	Total cost per week							\$ 7,652.43	$R = O + Q$
S	Caseload efficiency							95.0%	
T	Units per week							7.00	
U	Per Diem Rate							\$ 115.07	$U = (((J + L + M + Q) / S) + N) / B / T$
Ref.	Summary of Rate Model Components							Total	Notes
AA	Direct Service Employee Salaries & Wages							\$ 74.93	
AB	Indirect Service Employee Salaries & Wages							\$ 0.00	
AC	Transportation Service Employee Salaries & Wages							\$ 0.00	
AD	Employee related expenses							\$ 19.04	
AE	Transportation & fleet vehicle expenses							\$ 3.84	
AF	Administration, program support & overhead							\$ 17.26	
AG	Total Rate							\$ 115.07	

Appendix C
 State of Wisconsin
 Department of Health Services
 HCBS Minimum Payment Rate Development
 Exhibit 4 - CBRF > 8 T3

Service Information

Service Code: CBRF > 8 T3
 Reporting Units: Per Diem

Ref.	Description	DSP	Intermittent DSP	DSP Supervisor	Activities Staff	Specialty Vehicle Driver	RN / BH Professional Oversight	Total	Notes
A	Total Staff Hours per Week	129.33	112.00	46.13	20.00	3.00	5.00		The assumed number of weekly staff hours
B	Number of individuals served							10.00	The assumed number of clients in the home
C	PTO / training / conference time adjustment factor	8.7%	8.7%	8.7%	8.7%	8.7%	8.7%		Based on separate PTO build
D	Adjusted total hours of time per week	140.58	121.74	50.15	21.74	3.26	5.43		$D = A * (1 + C)$
E	Hourly wage	\$ 15.75	\$ 15.75	\$ 20.25	\$ 15.75	\$ 15.75	\$ 35.44		Based on separate wage build
F	Total wages expense per week	\$ 2,214	\$ 1,917	\$ 1,016	\$ 342	\$ 51	\$ 193		$F = D * E$
G	Holidays worked	10.00	10.00	10.00	10.00	10.00	10.00		10 holidays per year
H	Percent of non-holiday hours paid at time and a half	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		Based on assumptions
I	Percent of total hours paid at time and a half	2.7%	2.7%	2.7%	2.7%	2.7%	2.7%		$I = (365.25 * H + G) / 365.25$
J	Total direct care wage adjusted for overtime and holidays per week	\$ 2,244.48	\$ 1,943.67	\$ 1,029.46	\$ 347.08	\$ 52.06	\$ 195.23	\$ 5,811.99	$J = F * (1 - I) + F * I * 1.5$
K	Employee related expense (ERE) percentage	26.2%	26.2%	22.8%	26.2%	26.2%	17.6%		Based on separate ERE build
L	Total ERE expense per week	\$ 588.75	\$ 509.84	\$ 234.66	\$ 91.04	\$ 13.66	\$ 34.44	\$ 1,472.39	$L = J * K$
M	Mileage reimbursement or vehicle costs costs per week							\$ 255.16	Based on van build-up estimates
N	Medication costs							\$ 0.00	$N = \text{Medication Costs} * B * T$
O	Subtotal before administration / overhead / program support							\$ 7,539.54	$O = (J + L + M + N)$
P	Administration / program support / overhead percentage							15.0%	
Q	Administration / overhead / program support cost per week							\$ 1,330.51	$Q = (O * P) / (1 - P)$
R	Total cost per week							\$ 8,870.05	$R = O + Q$
S	Caseload efficiency							95.0%	
T	Units per week							7.00	
U	Per Diem Rate							\$ 133.38	$U = (((J + L + M + Q) / S) + N) / B / T$
Summary of Rate Model Components									
Ref.	Description							Total	Notes
AA	Direct Service Employee Salaries & Wages							\$ 87.40	
AB	Indirect Service Employee Salaries & Wages							\$ 0.00	
AC	Transportation Service Employee Salaries & Wages							\$ 0.00	
AD	Employee related expenses							\$ 22.14	
AE	Transportation & fleet vehicle expenses							\$ 3.84	
AF	Administration, program support & overhead							\$ 20.01	
AG	Total Rate							\$ 133.38	

Appendix C
 State of Wisconsin
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 HCBS Minimum Payment Rate Development
 Exhibit 4 - RCAC

Service Information

Service Code: RCAC
 Reporting Units: Per Diem

Ref.	Description	DSP	Intermittent DSP	DSP Supervisor	Activities Staff	Specialty Vehicle Driver	RN / BH Professional Oversight	Total	Notes
A	Total Staff Hours per Week	108.00	14.00	32.20	-	-	0.10		The assumed number of weekly staff hours
B	Number of individuals served							10.00	The assumed number of clients in the home
C	PTO / training / conference time adjustment factor	8.7%	8.7%	8.7%	8.7%	8.7%	8.7%		Based on separate PTO build
D	Adjusted total hours of time per week	117.39	15.22	35.00	-	-	0.11		$D = A * (1 + C)$
E	Hourly wage	\$ 15.75	\$ 15.75	\$ 20.25	\$ 15.75	\$ 15.75	\$ 41.41		Based on separate wage build
F	Total wages expense per week	\$ 1,849	\$ 240	\$ 709	\$ 0	\$ 0	\$ 5		$F = D * E$
G	Holidays worked	10.00	10.00	10.00	10.00	10.00	10.00		10 holidays per year
H	Percent of non-holiday hours paid at time and a half	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		Based on assumptions
I	Percent of total hours paid at time and a half	2.7%	2.7%	2.7%	2.7%	2.7%	2.7%		$I = (365.25 * H + G) / 365.25$
J	Total direct care wage adjusted for overtime and holidays per week	\$ 1,874.25	\$ 242.96	\$ 718.54	\$ 0.00	\$ 0.00	\$ 4.56	\$ 2,840.31	$J = F * (1 - I) + F * I * 1.5$
K	Employee related expense (ERE) percentage	26.2%	26.2%	22.8%	26.2%	26.2%	16.7%		Based on separate ERE build
L	Total ERE expense per week	\$ 491.64	\$ 63.73	\$ 163.78	\$ 0.00	\$ 0.00	\$ 0.76	\$ 719.91	$L = J * K$
M	Mileage reimbursement or vehicle costs costs per week							\$ 250.37	Based on van build-up estimates
N	Medication costs							\$ 0.00	$N = \text{Medication Costs} * B * T$
O	Subtotal before administration / overhead / program support							\$ 3,810.60	$O = (J + L + M + N)$
P	Administration / program support / overhead percentage							15.0%	
Q	Administration / overhead / program support cost per week							\$ 672.46	$Q = (O * P) / (1 - P)$
R	Total cost per week							\$ 4,483.06	$R = O + Q$
S	Caseload efficiency							95.0%	
T	Units per week							7.00	
U	Per Diem Rate							\$ 67.41	$U = (((J + L + M + Q) / S) + N) / B / T$
Ref.	Summary of Rate Model Components							Total	Notes
AA	Direct Service Employee Salaries & Wages							\$ 42.71	
AB	Indirect Service Employee Salaries & Wages							\$ 0.00	
AC	Transportation Service Employee Salaries & Wages							\$ 0.00	
AD	Employee related expenses							\$ 10.83	
AE	Transportation & fleet vehicle expenses							\$ 3.77	
AF	Administration, program support & overhead							\$ 10.11	
AG	Total Rate							\$ 67.41	

Appendix C
 State of Wisconsin
 Department of Health Services
 HCBS Minimum Payment Rate Development
 Exhibit 4 - SHC Agency

Service Information					
Service Code: SHC Agency					
Reporting Units: 15 Minutes					
Ref.	Description	DSP	Supervisor	Total	Notes
A	Average minutes of direct time per unit	15.00			
B	Average minutes of indirect time per unit	-			
C	Average minutes of transportation time per unit	-			
D	Total minutes per unit	15.00			D = A + B + C
E	Staffing Ratio	1.00			
F	Supervisor span of control		20.00		20 employees assumed to be managed by 1 supervisor
G	Supervisor time per unit		0.75		G = D / E / F
H	PTO / training / conference time adjustment factor	8.7%	8.7%		Based on separate PTO build
I	Adjusted Total minutes per unit	16.30	0.82		I = D / E * (1 + H) I = G * (1 + H)
J	Hourly wage	\$15.75	\$ 20.25		Based on separate wage build
K	Total wages expense per unit	\$ 4.28	\$ 0.28	\$ 4.56	K = J * I / 60
L	Employee related expense (ERE) percentage	26.2%	22.8%		Based on separate ERE build
M	Total ERE expense per unit	\$ 1.12	\$ 0.06	\$ 1.19	M = K * L
N	Estimated average MPH			25.00	Assumed MPH
O	Estimated miles driven per unit			-	O = C * N / 60
P	Federal reimbursement rate			\$ 0.655	
Q	Transportation fleet costs per unit			\$ 0.00	Q = O * P
R	On-Call Expenses			\$ 0.00	No on-call expenses
S	Drug Cost			-	No drug expenses
T	Drug Administration			-	No drug administration expenses
U	Administration / program support / overhead			10.0%	Portion of total rate
V	Administration Expenses			\$ 0.64	V = U * (K + M + Q + R + S + T) / (1 - U)
W	15 Minutes Rate			\$6.38	W = K + M + Q + R + S + T + V
Ref.	Summary of Rate Model Components			Total	Notes
X	Direct Service Employee Salaries & Wages			\$ 4.56	
Y	Indirect Service Employee Salaries & Wages			\$ 0.00	
Z	Transportation Service Employee Salaries & Wages			\$ 0.00	
AA	Employee Related Expenses			\$ 1.19	
AB	Transportation & Fleet Vehicle Expenses			\$ 0.00	
AC	Administration, Program Support & Overhead			\$ 0.64	
AD	Total Rate			\$6.38	

Appendix C
 State of Wisconsin
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 HCBS Minimum Payment Rate Development
 Exhibit 4 - SHC Non-Agency

Service Information					
Service Code: SHC Non-Agency					
Reporting Units: 15 Minutes					
Ref.	Description	DSP	Supervisor	Total	Notes
A	Average minutes of direct time per unit	15.00			
B	Average minutes of indirect time per unit	-			
C	Average minutes of transportation time per unit	-			
D	Total minutes per unit	15.00			D = A + B + C
E	Staffing Ratio	1.00			
F	Supervisor span of control		-		0 employee assumed to be managed by 1 supervisor
G	Supervisor time per unit		-		G = D / E / F
H	PTO / training / conference time adjustment factor	3.6%	3.6%		Based on separate PTO build
I	Adjusted Total minutes per unit	15.54	-		I = D / E * (1 + H) I = G * (1 + H)
J	Hourly wage	\$15.75	\$ 20.25		Based on separate wage build
K	Total wages expense per unit	\$ 4.08	\$ 0.00	\$ 4.08	K = J * I / 60
L	Employee related expense (ERE) percentage	0.0%	0.0%		Based on separate ERE build
M	Total ERE expense per unit	\$ 0.00	\$ 0.00	\$ 0.00	M = K * L
N	Estimated average MPH			25.00	Assumed MPH
O	Estimated miles driven per unit			-	O = C * N / 60
P	Federal reimbursement rate			\$ 0.655	
Q	Transportation fleet costs per unit			\$ 0.00	Q = O * P
R	On-Call Expenses			\$ 0.00	No on-call expenses
S	Drug Cost			-	No drug expenses
T	Drug Administration			-	No drug administration expenses
U	Administration / program support / overhead			0.0%	Portion of total rate
V	Administration Expenses			\$ 0.00	V = U * (K + M + Q + R + S + T) / (1 - U)
W	15 Minutes Rate			\$4.08	W = K + M + Q + R + S + T + V
Ref.	Summary of Rate Model Components			Total	Notes
X	Direct Service Employee Salaries & Wages			\$ 4.08	
Y	Indirect Service Employee Salaries & Wages			\$ 0.00	
Z	Transportation Service Employee Salaries & Wages			\$ 0.00	
AA	Employee Related Expenses			\$ 0.00	
AB	Transportation & Fleet Vehicle Expenses			\$ 0.00	
AC	Administration, Program Support & Overhead			\$ 0.00	
AD	Total Rate			\$4.08	

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