Executive Summary:

The Los Angeles Coalition of Service Providers consists of 18 agencies throughout Southern California who collectively serve approximately 21,000 people of all ages. In total, our members employ over 7,000 people and provide services to 12 of California’s 21 Regional Centers.

The Coalition has been actively studying the documents released by DDS and Burns and Associates since they became available. The document below is the collective feedback we offer to those documents.

There are many good elements in the rate study and proposals presented to the community on February 25 and to the Legislature on March 15. Crucial relief for residential services including supportive living options is a very positive feature. The size of the overall fiscal impact presented to the Legislature is not surprising to people who have been struggling to keep services flowing over the past two decades. The Los Angeles Coalition of Service Providers thanks DDS for presenting the overall picture to the Legislature.

Any study this large and complex must be subject to a serious and careful vetting of its underlying assumptions that drive the costing of the services. In our assessments we have identified several assumptions that we believe need adjustment. We have offered alternatives based upon our collective experience.

Additionally, these proposals would cause the elimination of some categories of services, the collapsing of many others into a few and the homogenization of dozens of programs originally designed by 21 different regional centers to meet the unique needs of consumers in their regions. The ability of communities to help shape the character of their services through input to their local Regional Center is a principle that families fought hard for and is central to the notion of consumer and family choice. It is imperative that the proposed models do not, inadvertently eliminate services which have emerged through local innovation to meet important services needs of consumers. In our assessment we did find such omissions. We have addressed them in this document.

Because California has the Lanterman Act and the IPP as its legal center of gravity, we must pay very careful attention to the impacts to consumer services resulting from changes in the costing models. In our initial assessment, we see the potential for significant unintended impacts to consumer services if modifications are not made before the proposals are adopted. We encourage the Advocacy and State Planning agencies, DRC and the SCDD to carefully
review the rate proposals for adherence to the Lanterman Act as well as State policy initiatives including the California Blueprint, Employment First policies and State planning initiatives for transition to new CMS rules for Federal reimbursement. At first glance, we do not see sufficient attention to meaningful Individualized service planning. It is imperative that we understand all of these potential impacts to the rights of consumers to services under the Lanterman Act, prior to implementation.

From the perspective of the agencies directly charged with providing actual services in the greater Los Angeles region, we do see a number of very important cost assumptions which must be corrected before the study will be ready for serious consideration by the Legislature. Most of these relate to the realities of recruiting, training, deploying, supporting and managing a stable workforce competent and capable of meeting the needs of all consumers throughout the region. These issues are critical in our area where labor costs have escalated far beyond the assumptions in this study.

Finally, we want to again express our appreciation and respect for the scope of the work undertaken by DDS and their contractor. We believe that we can join with other stakeholder groups, the DS Taskforce, the advocacy and State planning agencies to help DDS and their contractor correct these assumptions in time for action by the legislature in the next budget cycle.

| Provider Survey | Real costs of providing services that are communicated in the provider survey results are not realized in the proposed rate models. There are quite a few examples that have a significant impact. |
| Family and Consumer Survey | no comment |
| Public Comment Process | The original plan, as recently as the DS Task Force Rates Subcommittee meeting in November 2018, was for the public comment period to occur prior to the submission of the Rate Study to the Legislature. Please see slide 22 of B&A’s presentation Project Update for CDSA dated September 25, 2018. |
Unfortunately, this did not occur and the Legislature received what many in the field characterize as a flawed rate study prior to the public having the ability to provide comments. It is unfortunate that DDS could not maintain its original schedule and have a process to engage the public in the review of the rate study before its submission. This lack of timely public engagement is a significant flaw in the rate study process.

The proposed rate models have some important innovations (e.g. DSP 1, 2, 3; job development) and provide a transparent model that will simplify and make more consistent the current system. However, many of the assumptions in the proposed rate models are faulty and we present comments here on the areas we found to be most egregiously out of step with real conditions.

The Fiscal Impact Analysis has some notable and significant flaws:
1. The fiscal analysis appears to suggest that people served in 2019-2020 will be in the same programs as they were in 2016-2017. As the models are implemented, providers will shift their offerings to align with the new rates and work with Regional Centers to adjust IPPs and authorizations. The fiscal analysis is under-projecting costs because many people will be moving from lower rate programs to higher rate programs.
2. Some current program models (e.g. Project SEARCH, College to Career, Careers in the Arts, Tailored Day Services) don’t have rate models in the proposed rate structure so it is difficult to see how a fiscal impact analysis could be done on those programs.
3. The draft rate models propose that some of the services have substantial new requirements, such as certifications for staff. The rate models propose an increase for some of these services, but the increase is not nearly sufficient to cover the cost of hiring staff with those specific credentials and many of those programs would have to close their doors. The Fiscal Impact Analysis does not take into consideration the number of programs that would close and the cost of transitioning people served to other, more costly models.
4. The Fiscal Impact Analysis assumes that the move to hourly billing for day program will not impact overall attendance rates. Our experience (detailed later in
these comments and confirmed by multiple providers) is that half-day billing significantly lowered attendance rates. Hourly billing will lower attendance rates even more. In this area, the Fiscal Impact Analysis overstates revenue increases by not accounting for hourly billing rates lowering attendance.

5. The change of billing structure from “per job coach” to “per person served” in group supported employment will have a similar impact on lowering revenue projections as the hourly billing will have for day programs.

Comment Topic: WAGES

| Wages #1 (base wage of DSP) | The proposed base wage of $14.89 was formulated using incorrect occupation classifications for a DSP in our service industry. This wage rate heavily weighs caregiver rather than teaching and training occupations which in turn skews the wage downward and creates a policy shift to more IHSS or Home Health Aide style workers than training and habilitation work classification. These erroneous classifications included: 55% Personal Care Aide, 15% Home Health Aide, 15% Psychiatric Aide and 15% Recreation Worker. The consultants stated in their presentation that many vendors completed their DOL annual reporting using the Personal Care Aide BLS code. This is not a good rationale for applying that BLS code across the board. DOL reporting is typically completed by an administrative assistant who has little direct knowledge regarding the appropriate job categories for a DSP. Since there is no BLS category for a DSP, the administrative aides chose one that seemed – to them – to match. However, this should not be the basis for determining the appropriate job mix for a DSP. Rather, the rate study should do a detailed analysis of the DSP job responsibilities and align them to the most appropriate BLS codes.

The model presented on the following page uses a consolidated list of DSP function areas compiled from multiple large vendors and assigns a BLS code to each functional area. The resulting base wage is $19.94 per hour, which is a much closer model of what a DSP should be paid to provide the high-quality support and guidance that California’s people with developmental disabilities deserve. (See table 1)

Basic competency must be expected to deliver high quality services in inclusive-based environments. At minimum, the wage rate should be set for NADSP competency expectations, which again would set the rate at $19.94/hour. See Table 1a.

Table 1b depicts scenarios of addressing minimum wage, more accurate base wage, and base wage plus supervisor wage accuracy, plus corrected Admin costs, but impacts would be similar if addressed for day services and other models. Appropriate assumptions must be used to catch up how depressed our rates are now and to create sustainable system moving forward. Overall, the rates need to appear more similar to scenario 3 of the attachment in order to address real world costs.

| Wages #2 (geographic differences) | The proposed rate models do not back in local minimum wages based on the explanation that the previous Administration felt that the state should not cover the costs of local minimum wage ordinances. The Legislature required that the rate study determine whether, “the current method of rate setting for a service category
provides an adequate supply of providers in that category..." If the rate study does not consider the actual costs of operations in a location, it cannot possibly provide for an adequate supply of providers. For instance, the base DSP wage built on 55% of the BLS wage of a Personal Care Aide whose median wage of $14.22/hour (adjusted to CA State Minimum Wage) is illegal to pay in Los Angeles County. If adopted, the Rate Study would result in a DD program desert in Los Angeles County and other areas where the proposed rates are built on wages that are illegal to pay.

The study authors contend that the geography multiplier for wages counters the lack of adjusting base wages for local minimum wage. This may work for San Francisco where the local minimum wage ordinance has been in effect since 2003 and wages have increased across the region and across all job categories. The Los Angeles local minimum wage ordinance did not go into effect until July 1, 2016 so wages have not had time to adjust to the local minimum wage ordinance. The geographic wage calculation in the proposed rate models is built on the BLS data from May 2017, less than a year after the LA minimum wage ordinance went into effect.

Further complicating the issue is that BLS data is based on MSA. Los Angeles County is a single MSA of 13.5M people so there is no way to differentiate high cost areas of the County (e.g. West LA, Beverly Hills) from much lower cost areas (e.g. Antelope Valley). LA County has more than 34% of CA’s population and comprises seven of the 21 Regional Centers. It should not be lumped in one geographic area for determining local wage rates. There are 26 MSAs in California; after the LA MSA, the next largest has only 4.7M people and 20 of the 26 MSAs have populations under 1M people. There must be a better way for determining local wage adjustments rather than MSA data.

The proposed rate models should: 1) use the local minimum wage as the base wage modifier in each location rather than state minimum wage; and 2) divide the LA BLS data into subregions so that regional centers serving high cost areas have a higher wage adjustment.
Table 1:

<table>
<thead>
<tr>
<th>DSP Area of Responsibility</th>
<th>SOC</th>
<th>SOC Code</th>
<th>wage</th>
<th>percent of time</th>
<th>weighted wage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Counsel individuals to maximize the independence and employability of persons coping with personal, social, and vocational difficulties that result from birth defects, illness, disease, accidents, aging, or the stress of daily life. Coordinate activities for residents of care and treatment facilities. Assess client needs and design and implement rehabilitation programs that may include personal and vocational counseling, training, and job placement. Excludes “Occupational Therapists” (29-1122).</td>
<td>Rehabilitation Counselors</td>
<td>21-1015</td>
<td>17.2</td>
<td>0.35</td>
<td>6.02</td>
</tr>
<tr>
<td>Teach or instruct individuals or groups for the primary purpose of self-enrichment or recreation, rather than for an occupational objective, educational attainment, competition, or fitness. Excludes “Coaches and Scouts” (27-2222) and “Exercise Trainers and Group Fitness Instructors” (39-0031). Flight instructors are included with “Aircraft Pilots and Flight Engineers” (25-1010).</td>
<td>Self-Enrichment Teachers</td>
<td>25-3021</td>
<td>23.29</td>
<td>0.35</td>
<td>8.1516</td>
</tr>
<tr>
<td>Collaborate with the individual and others in the development of an individualized instructional/service program to assist the individual to achieve skills and community behaviors necessary to succeed in desired employment (paid or volunteer) and community engagement activities, to assess and document progress, or needs for instructional changes and to participate in ongoing progress assessment.</td>
<td>Educational Guidance, and Career Counselors and Advisors</td>
<td>21-1012</td>
<td>33.18</td>
<td>0.04</td>
<td>1.3272</td>
</tr>
<tr>
<td>Assist mentally impaired or emotionally disturbed patients, working under direction of nursing and medical staff. May assist with daily living activities, lead patients in educational and recreational activities, or accompany patients to and from examinations and treatments. May restrain violent patients. Includes psychiatric orderlies.</td>
<td>Psychiatric Aides</td>
<td>31-1013</td>
<td>15.64</td>
<td>0.04</td>
<td>0.6256</td>
</tr>
<tr>
<td>Perform administrative and certain clinical duties under the direction of a physician. Administrative duties include scheduling appointments, maintaining medical records, billing, and billing for insurance purposes. Clinical duties may include taking and recording vital signs and medical histories, preparing patients for examination, drawing blood, and administering medications as directed by a physician. Excludes “Physician Assistants” (29-1071).</td>
<td>Medical Assistants</td>
<td>31-9092</td>
<td>17.31</td>
<td>0.05</td>
<td>0.9555</td>
</tr>
<tr>
<td>Provide personalized assistance to individuals with disabilities or illness who require help with personal care and activities of daily living support (e.g., feeding, bathing, dressing, grooming, toileting, and ambulation). May also provide help with tasks such as preparing meals, doing light housekeeping, and doing laundry. Work is performed in various settings depending on the needs of the care recipient and may include locations such as their home, place of work, or in the community, or at a daytime nonresidential facility.</td>
<td>Personal Care and Service Occupations</td>
<td>39-0000</td>
<td>14.28</td>
<td>0.1</td>
<td>1.428</td>
</tr>
<tr>
<td>Under close supervision of a physical therapist or physical therapy assistant, perform only delegated, selected, or routine tasks in specific situations. These duties include preparing the patient and the treatment area.</td>
<td>Physical Therapist Aides</td>
<td>31-2022</td>
<td>15.44</td>
<td>0.05</td>
<td>0.772</td>
</tr>
<tr>
<td>Assess community employment environments (paid or volunteer) and other community venues and to develop task analyses, instructional services and supports unique to the consumer’s learning/information processing modalities.</td>
<td>Special education teachers, all other</td>
<td>25-2059</td>
<td>37.5</td>
<td>0.02</td>
<td>0.75</td>
</tr>
</tbody>
</table>

1 19.9378

Table 1a:

| Area 1: | Participant Empowerment | 3 |
| Area 2: | Communication | 3 |
| Area 3: | Assessment | 3 |
| Area 4: | Community and Service Networking | 4 |
| Area 5: | Facilitation of Services | 4 |
| Area 6: | Community Living Skills & Supports | 5 |
| Area 7: | Education, Training & Self-Development | 5 |
| Area 8: | Advocacy | 5 |
| Area 9: | Vocational, Educational & Career Support | 6 |
| Area 10: | Crisis Prevention & Intervention | 6 |
| Area 11: | Organizational Participation | 6 |
| Area 12: | Documentation | 7 |
| Area 13: | Building and Maintaining Friendships & Relationships | 7 |
| Area 14: | Provide Person Centered Supports | 8 |
| Area 15: | Supporting Health & Wellness | 8 |
Table 1b:

<table>
<thead>
<tr>
<th>Unit of Service</th>
<th>Base - B&amp;A Proposed</th>
<th>Scenario 1</th>
<th>Scenario 2</th>
<th>Scenario 3</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Direct Support Staff Wages and Benefits</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Direct Staff Hourly Wage</td>
<td>$14.89</td>
<td>$15.00</td>
<td>$19.94</td>
<td>$19.94</td>
</tr>
<tr>
<td>Employee Benefit Rate (as a percent of wages)</td>
<td>26.40%</td>
<td>26.40%</td>
<td>26.40%</td>
<td>27.38%</td>
</tr>
<tr>
<td>Workers' Compensation Rate (as a percent of wages)</td>
<td>4.20%</td>
<td>4.20%</td>
<td>4.20%</td>
<td>4.20%</td>
</tr>
<tr>
<td><strong>Productivity Adjustments</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Hours</td>
<td>40.00</td>
<td>40.00</td>
<td>40.00</td>
<td>40.00</td>
</tr>
<tr>
<td>Travel Time Between Individuals</td>
<td>1.11</td>
<td>1.40</td>
<td>1.50</td>
<td>1.50</td>
</tr>
<tr>
<td>Recordkeeping and Reporting</td>
<td>1.11</td>
<td>0.89</td>
<td>0.89</td>
<td>0.89</td>
</tr>
<tr>
<td>Supervision and Other Employer Time</td>
<td>0.89</td>
<td>0.89</td>
<td>0.89</td>
<td>0.89</td>
</tr>
<tr>
<td>Training</td>
<td>0.67</td>
<td>0.67</td>
<td>0.67</td>
<td>0.67</td>
</tr>
<tr>
<td>&quot;Billable&quot; Hours (Weekly)</td>
<td>32.37</td>
<td>32.30</td>
<td>32.20</td>
<td>32.20</td>
</tr>
<tr>
<td>Productivity Factor</td>
<td>1.24</td>
<td>1.24</td>
<td>1.24</td>
<td>1.24</td>
</tr>
<tr>
<td><strong>Staff Cost After Productivity Adj. per Billable Hours</strong></td>
<td>$24.12</td>
<td>$24.30</td>
<td>$32.30</td>
<td>$32.54</td>
</tr>
<tr>
<td><strong>Mileage</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of Miles Traveled per Week</td>
<td>100.00</td>
<td>105.00</td>
<td>125.00</td>
<td>125.00</td>
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<tr>
<td>Amount per Mile</td>
<td>$0.58</td>
<td>$0.58</td>
<td>$0.58</td>
<td>$0.58</td>
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<tr>
<td>Weekly Mileage Cost</td>
<td>$58.00</td>
<td>$60.90</td>
<td>$72.50</td>
<td>$72.50</td>
</tr>
<tr>
<td>Mileage Cost per Billable Hour</td>
<td>$1.79</td>
<td>$1.89</td>
<td>$2.25</td>
<td>$2.25</td>
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<tr>
<td><strong>Supervision</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Supervisor Hourly Wage</td>
<td>$23.04</td>
<td>$23.04</td>
<td>$40.79</td>
<td>$40.79</td>
</tr>
<tr>
<td>Supervisor Benefit Rate (as a percent of wages)</td>
<td>20.92%</td>
<td>20.92%</td>
<td>20.92%</td>
<td>21.62%</td>
</tr>
<tr>
<td>Workers' Compensation Rate (as a percent of wages)</td>
<td>4.20%</td>
<td>4.20%</td>
<td>4.20%</td>
<td>4.20%</td>
</tr>
<tr>
<td>Weekly Supervision Cost (40 Hours)</td>
<td>$1,053.01</td>
<td>$1,053.01</td>
<td>$2,041.46</td>
<td>$2,052.88</td>
</tr>
<tr>
<td>Number of Direct Staff Supervised</td>
<td>10</td>
<td>10</td>
<td>10</td>
<td>10</td>
</tr>
<tr>
<td>Supervision Cost per Billable Hour per Staff</td>
<td>$3.25</td>
<td>$3.26</td>
<td>$6.34</td>
<td>$6.38</td>
</tr>
<tr>
<td><strong>Admin. And Program Operations</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cost per Hour, Before Program Operations &amp; Administration</td>
<td>$29.16</td>
<td>$29.45</td>
<td>$40.89</td>
<td>$41.17</td>
</tr>
<tr>
<td>Daily Program Operations Costs (5 Day Work Week)</td>
<td>$10.00</td>
<td>$10.00</td>
<td>$10.00</td>
<td>$10.00</td>
</tr>
<tr>
<td>Program Operations Cost per Billable Hour</td>
<td>$1.54</td>
<td>$1.55</td>
<td>$1.55</td>
<td>$1.55</td>
</tr>
<tr>
<td>Administration Percent</td>
<td>12.00%</td>
<td>12.00%</td>
<td>12.00%</td>
<td>12.00%</td>
</tr>
<tr>
<td>Administration Cost per Billable Hour</td>
<td>$3.68</td>
<td>$3.72</td>
<td>$5.09</td>
<td>$6.41</td>
</tr>
<tr>
<td><strong>Rate per Billable Hour</strong></td>
<td>$34.38</td>
<td>$34.72</td>
<td>$47.53</td>
<td>$49.13</td>
</tr>
</tbody>
</table>

Wages #3 (Workers Compensation)

Please see Table 2 for expertly cited issues with the WC percentages utilized in the Rate Study.

Benefits (Health Insurance)

The Kaiser Family Foundation compiles an annual survey of employer health benefits across the country (https://www.kff.org/health-costs/report/2018-employer-health-benefits-survey/), receiving information from over 2,100 employers. The 2018 survey reported that the average employer cost for health insurance for a single person is $5,711/year and $14,069/year for a family. The report stated that insurance costs rose 5% from 2017 to 2018. Using that same inflationary factor, the costs to employers could be expected to be $5,997 and $14,772 in 2019. Estimating that 90% of employees...
take single coverage and 10% elect family coverage, the weighted cost for 2019 should be $572.85/month rather than $450/month. (See table 3)
March 25, 2019

RE: Workers Compensation Classification Codes 8868 & 9101 Rate Assumptions

To Whom This May Concern,

I am a partner of Bolton & Company Insurance Brokers, we are headquartered out of Pasadena, CA and have been successfully specializing in servicing non-profits since 1931. As an agency we are one of a handful of niche specialists in this unique business sector and as such can speak with true expertise to the issues of Workers Compensation rates and how they affect our client base of southern CA non-profits.

Class codes 8868 and 9101 are fundamental to the non-profits we serve. These classification codes were recently under scrutiny because they represent a broad base of job hazard and employment. These class codes represent a variety of professions from teachers, professors, school administrators, therapists, social workers, etc. These class codes do not discriminate on whether the employee is a teacher at a private school or if the employee is a social worker dealing with individuals with disabilities in a community based program. No discrimination on job hazard despite the fact that one job is far more dangerous than the other. In as such the expected loss rate formula for these classifications codes are heavily skewed towards lower hazards as there are far more schools than there are niche non-profits who support people with disabilities. This in turn makes for a large disparity in the Experience Modification Rating for all of our non-profits in this space. This outright bad data on the front end distorts the formula, which in turn, creates extremely inflated Experience Modification Rating factors for non-profits. Of our dozens of non-profits the average Experience Modification is well over 1.50, creating a 50% debit to the premium charged to these organizations. Not only does this increase the non-profits premium disproportionately, it also restricts their access to the marketplace as most insurance companies will not underwrite a risk with an Experience Modification of 1.50 or higher. This is a specific problem to the non-profit space that is actually worsening year by year and is not directly correlated to a disproportionate amount or degree of claims our non-profits incur. Rather it is an inherently flawed “field of play” in which jobs that are more hazardous by nature are being directly compared to jobs that do not share the same exposures. Simply put, nonprofits are punitively penalized for their claim activity.

There is also a myth that the Workers Compensation marketplace is “softening” in CA. I want to address that as well, as it is not the case for all cities in our great state. While it is nice that the Workers Compensation Insurance Rating Bureau (WCIRB) can issue press releases of lowered pure premium rates; these press releases do not take into account that most insurance companies apply territory rating factors to their Workers Compensation pricing. Multiple companies, including but not limited to the State Compensation Insurance Fund, will either credit or debit a company based upon their geographical headquarters. In Los Angeles county the debit is as high as an additional 20%. For State Compensation Insurance Fund, the current debit allocated is an additional 15%. State Compensation Insurance Fund is the largest insurer of non-profits in CA. If this territory rating is not allocated into the rate study, it would be off the mark by at least 15%.

Furthermore, another issue for Workers Compensation is the escalating increase of minimum wage in CA. Workers Compensation is charged as a percentage of payroll. With payroll increases come Workers Compensation increases. To continue to increase minimum wage is to continue to increase Workers Compensation premium for all employers.
Lastly, another major issue for non-profits is that medical costs continue to rise without an end in sight. Medical inflation continues to outpace normal inflation. Workers Compensation pricing is largely predicated on medical cost of care. With the continual increase costs of service and the diminishing, often times eradicated, company health insurance programs; Workers Compensation becomes a venue to address medical concerns that are questionably or not at all work related as it is guaranteed. Workers Compensation will undoubtedly continue to increase over time as it follows in stride with the cost of medical care. A budget for future increases should be considered in any long term rate strategy.

The Workers Compensation market in CA is extremely volatile. For non-profits this is always one of the larger line items on the annual budget. In determining adequate rates means to understand the entire picture. The artificially inflated Experience Modification Rating factors, the limited marketplace making for less competitive pricing, the territory debiting placed on certain cities/counties, the increase in minimum wage and the ever increasing cost of medical care are all each by itself a reason reconsider the funding in the current rate study. These issues combined can lead to a perfect storm where many non-profits will be forced to close their doors. Eradicating decades of virtuous work in our communities in supporting our most vulnerable citizens.

The collateral damage this will have on the families, our disabled citizens and the noble citizens that serve our communities will be disastrous. On behalf of my agency, I ask that you consider the points above and the ramifications ignoring them has on thousands of families in our communities and in our state.

Respectfully,

Matt Chase
Executive Vice President
The proposed rate study model includes 25 annual days off, including 10 holidays and 15 sick or vacation days. This is insufficient for a number of reasons:

1) The Department is proposing a 14-day standard holiday schedule. The rate models should either include this 14-day holiday schedule or the Department should withdraw its 14-day holiday proposal. The Legislative Analyst Office (LAO) concurs by stating “that currently, California state government observes 11 holidays each year and the federal government observes 10. The 14-day schedule would therefore exceed both state and federal government practices.”

2) Different Regional Centers have different holiday schedules. Just for example, Tri-Counties RC has 10 days while North Los Angeles County RC has 12 days. Since there are different rates for each Regional Center, the rate models should incorporate the actual number of holidays per Regional Center. Furthermore, the “Annual Days of Program Operations” should be adjusted for the accurate number of holidays.

3) The 15 combined vacation and sick days is based on national BLS data for employees with 1-5 years of experience. Various providers offer competitive benefit packages to recruit and retain valuable employees. For example, at PathPoint, more than 25% of the employees have over 10 years of experience. At Tierra del Sol, 25% of the employee base has 10 years or more in service earning 160 to 200 hours of vacation time depending on length of service.

Therefore, a more accurate assumption would be to place 50% of employees as under 5 years tenure, 25% at 6-10 years tenure and 25% at 10+ years tenure.

Using weighted averages, the accurate annual PTO to apply is 31.75 days or 254 hours. This would then be further adjusted up for more than 10 holidays. See Table 4.
The proposed rate study model does not include any provisions for paid time off for legally mandated uninterrupted rest breaks. These are significant costs to providers that are required by California law but not included in the proposed rate models. Each rate model should account for two ten-minute, paid uninterrupted breaks for each workday that is at least six hours long and up to 10 hours long. Programs must hire enough staff to cover these breaks as people served cannot be left without care and supervision. The statute requires that staff have a completely uninterrupted rest break where they cannot be on-call or have any restrictions on their time. For a typical 40-hour per week worker, this would account to an additional 100 minutes (1.67 hours) of unbillable time every week. The proposal should add 1.67 hours/week of non billable time for each rate model.

The Rate Model does not account for any additional infrastructure required to provide direct services. It appears that the entire service system will be delivered in pods of 1 supervisor to 10 staff without further program director or leadership. The Rate study should account for larger models of service by including a weighted average for supervision.

For example,
100% of a First Line Supervisor (included)
25% of Program Director (not included)
12.5% of a Regional Director (not included)
.0125% of a Chief Operating Officer (not included)

All of these positions or ones similarly (such as Support Plan Coordinators and Assistant Coordinators) are direct service positions responsible for the development and delivery of the ISP objectives, program outcomes including integration and employment in the community, quality assurance, intake/enrollment, customize Person-Centered Plans, and so forth.

These are not administrative roles.

The facility costs for the rate models were based on standard real estate data from LoopNet and Colliers International. However, the models did not take into consideration the specific real estate needs of DD programs. For instance, licensed day programs must be in sprinklered facilities with a high number of dedicated restrooms. In addition, many facilities need to be on the ground level, be completely...
ADA-accessible and be in integrated locations that are not proximate to other similar facilities.

PathPoint’s experience is that these additional requirements dramatically increase the facility costs versus what a general search of all available commercial real estate would find. For instance, the average cost of four PathPoint facilities in diverse parts of the Tri-Counties Regional Center area (San Luis Obispo, Santa Barbara, Simi Valley and Santa Maria) is $26.68/sf, 78% higher than the Rate Study’s rate of $15/sf. The Rate Models should increase their rates by 78% to account for the additional costs of leasing facilities that meet CCL requirements and the needs of operating DDS-funded programs.

**Administration**

The provider survey reported an average administrative rate of 16.9%. The proposed rate models lowered the administrative rate across the board to 12% with the argument that overall increases in the proposed rates of 41% will be countered by lowering the admin rate by 41% to keep the overall amount of administrative costs constant. The consultants reported that when rates go up the amount of administrative costs don’t increase so therefore the administrative rate should decrease. However, there is a major fault in this reasoning.

Individual vendors do not provide all of the services in the proposed rate models. Some vendors will see rate increases so their administrative costs will be covered at a 12% rate with the overall rate increases. However, for other vendors, their rates will decrease or will see increases below 41% so their administrative costs will not be covered at the 12% rate. For instance,

- PathPoint reports that their amount of administrative costs for Independent Living, 1:1 is now $6.28/hour and it would go to $4.19/hour in the proposed rate model. Further, their amount of administrative costs for Supported Employment – Individual, Job Coaching is now $6.18/hour and it would go down to $4.31/hour in the proposed rate model. (See Table 5)

The proposed rate model provides no justification for cutting the administration percentage aside from keeping the administrative dollars the same in the aggregate. This rationale breaks down as soon as the individual services are separated by what each vendor provides. To go forward, the rate model should be revised to either:

1. Have individual administrative rates for each service based on how the rates are changing in that service so that the overall administrative costs remain constant; or
2. If #1 is too complicated, have a base administrative rate of 15% across all services that covers the administrative costs allowed by statute.

It is also worth noting that the flat rates have forced vendors to reduce their administrative costs to levels that are not likely sustainable. The provider survey, therefore, under-reports needed administrative costs due to the rate pressure on current administrative costs. Cutting administrative costs for all services to 12% further provides a significant cut to many individual services so that the proposed rate models are not reflective of actual costs.

Furthermore, it is worth noting that the Burns 2015 study of rates in the neighboring state of Oregon proposed a 20% administrative rate. It doesn’t make sense that California’s administrative costs would be 40% lower than its neighbor.
One other important note on administration is that the proposed rate models call for hourly billing and separate billing for various services such as community-based versus facility-based and DSP I versus DSP II services. In some cases, a person served will have to be billed under multiple different rates on the same day. These changes will add a huge administrative and data keeping burden that will inevitably increase rates more than they were reported on the provider rate survey.

Table 5:

<table>
<thead>
<tr>
<th>Service</th>
<th>Current Situation</th>
<th>Proposed Rates</th>
<th>Change</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Rate (per hr)</td>
<td>Admin %</td>
<td>Admin $$$/hr</td>
</tr>
<tr>
<td>Independent Living, 1:1 (page 113)</td>
<td>$37.16</td>
<td>16.9%</td>
<td>$6.28</td>
</tr>
<tr>
<td>Supported Employment - Individual, Job Coaching (page 1256)</td>
<td>$36.37</td>
<td>16.9%</td>
<td>$6.18</td>
</tr>
</tbody>
</table>
LOS ANGELES COALITION
COMMENTS
COMMUNITY-BASED
CENTER/FACILITY &
COMMUNITY
<table>
<thead>
<tr>
<th>Comment Topic</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Wages</td>
<td>See general comments on DSP wage and geographic factors.</td>
</tr>
<tr>
<td>Benefits</td>
<td>See general comments on benefits.</td>
</tr>
<tr>
<td>Productivity Factors (Billable Hours)</td>
<td>The rate models for day programs show billable hours in excess of 30 hours per week, which is illegal. Programs are only allowed to bill for 30 hours per week for each person served. When raised in the briefing, the consultants responded that some staff have to work early and late due to early arrivals and late departures. However, their billable time during these periods is not at a full FTE. Here’s an example to illustrate: Mary, a DSP, is responsible for four people served: A, B, C and D in a 1:4 program that operates from 9:00 am to 3:00 pm. Person A arrives at 8:00 am and leaves at 2:00 pm. Persons B &amp; C arrive at 9:00 and leave at 3:00. Person D arrives at 10:00 and leaves at 4:00. Mary must work from 8:00 to 4:00, an eight-hour day. From 8:00 – 9:00 she works with person A and is able to bill for 1 person or 0.25 FTE. From 9:00 AM – 10:00 AM she can bill for persons A, B and C for 0.75 FTE. From 10:00 AM – 2:00 PM she bills for all four people for a total of 4.0 FTE. From 2:00 – 3:00 PM she bills for persons B, C and D for 0.75 FTE and from 3:00 – 4:00 PM she bills only for Person D for 0.25 FTE. Her total billing is 0.25 + 0.75 + 4.0 + 0.75 + 0.25 = 6 FTE hours. Mary has to work for eight hours but can only bill for six hours. All productivity adjustments for all day programs cannot exceed 30 hours of billable time per week. See Table 6. In addition, one of the assumptions in the rate model is that program set-up and clean-up is only about five minutes each day when it should be at least 15 minutes each day for set up and another 15 minutes for clean-up, increasing that line item from 1.11 hours to 2.5 hours.</td>
</tr>
</tbody>
</table>
The rate model proposes an attendance rate of 90% for day programs, which is significantly overstated. The Provider Survey reported that Service Code 055 (non-medical, non-behavioral) had an average attendance of 88%, Service Code 505 (non-medical, non-behavioral) had an average attendance rate of 87% and Service Code 510 (non-medical, non-behavioral) had an average attendance rate of 88%. Providers reported their attendance rates before they were impacted by half day billing.

For example,

- PathPoint found that half day billing lowered the effective attendance rate up to 16% in certain programs.
- Tierra del Sol recently experienced a shift from a daily program model to an hourly program model. For those individuals who opted, through the IPP process, to purchase hourly services from this agency only did so at a 70.8% rate which resulted in significant reduction in billable hours.

Further breaking the day into hourly billing will significantly impact attendance as the effective attendance rate will decrease every time a bus is late in the morning or a person served has a doctor’s appointment or their family needs to pick them up early. A person who arrives 31 minutes late has an effective attendance rate of 83% even if they never miss a day since the vendor can only bill for five of the six program hours.

Additionally, Individuals who have more complex medical and behavioral support needs have more appointments and volatility in their attendance.

The Coalition recommends that the average attendance rate reported by the providers (87.7%) be reduced at least five percentage points to account for
half-day billing and then another ten percentage points to account for hourly billing to an overall attendance rate of 72%.

| Supervision and Program Operations | The proposed Rate Model considered the Supervisor to be BLS code 39-1021, First-line Supervisor of Personal Service Worker. However, this code is for a worker with only a high school education and less than five years of experience. Nearly all of the day programs are licensed facilities and the program supervisor serves as the Administrator of the licensed facility per the CA Department of Social Service’s Community Care Licensing. The qualifications and duties of the Administrator are defined in statute in section 82064 of Title 22 and state, “(a) All adult day programs shall have an administrator who meets either of the following requirements:

1. A baccalaureate degree in psychology, social work or a related human services field and a minimum of one year experience in the management of a human services delivery system, or

2. Three years of experience in a human services delivery system including at least one year in a management or supervisory position and two years of experience or training in one of the following:
   - Care and supervision of clients in a licensed adult day program, or an adult day health care facility.
   - Care and supervision of one or more of the categories of persons to be served by the day program.”

This type of position exceeds the basic requirements of BLS Code 39-1021 and a more appropriate BLS code is 11-9151, Social / Community Service Manager with a median salary of $32.13. The rate models should use this designation for the supervisor to better reflect the actual duties of the Program Administrator as defined by Title 22, Section 82064 and the Department of Social Service’s Community Care Licensing. |

| Supervision and Program Operations | The Rate Model does not account for any additional infrastructure required to provide direct services. It appears that the entire service system will be delivered in pods of 1 supervisor to 10 staff without further program director or leadership. The Rate study should account for larger models of service by including a weighted average for supervision.

For example,

- 100% of a First Line Supervisor (included)
- 25% of Program Director (not included)
- 12.5% of a Regional Director (not included)
- 0.0125% of a Chief Operating Officer (not included)

All of these positions or ones similarly (such as Support Plan Coordinators and Assistant Coordinators) are direct service positions responsible for the development and delivery of the ISP objectives, program outcomes including integration and employment in the community, quality assurance, intake/enrollment, customize Person-Centered Plans, and so forth.

These are not administrative roles. |

| Administration | See general comments on administration. |

| Other (Group Size) | The rate models provide models for community-based day programs with ratios of 1:3 and 1:2 but not 1:4. |
There are several providers in the LA Coalition who currently provide innovative community-based services at a 1:4 model. For example,

- PathPoint currently has nearly 300 people enrolled in community-based 1:4 programs operating in five counties.
- Tierra del Sol has nearly 100 individuals enrolled in what now would be referred to Community-Based - Community, but at a 1:4 ratio, in the San Fernando Valley.

The 1:4 model works for these people and they are successful in being integrated into community work, volunteer and education sites.

The lack of a 1:4 community-based option would force all of these people to transfer to a more restrictive and more costly program. The proposed rate models did not provide any rationale for taking this option away from Californians who are thriving in these currently operating programs that meet the HCBS Settings Rule. The proposed rate models should add a 1:4 program model for community-based programs.

**Other (facility costs)**

The rate models have a standard 50 sf/person allowance across all program models. This is surprising given that the Provider Survey results of 27 different types of day services showed that 23 of those services had more than 50 sf/person and only 4 had less than 50 sf/person.

For instance,

- Service Code 055 (non-medical, non-behavioral) had an average of 83 sf/person,
- Service Code 505 (non-medical, non-behavioral) had 88 sf/person
- Service Code 510 (non-medical, non-behavioral) had 82 sf/person.

Additionally, the medical Management model had between 200-300 sf/person in the provider survey, yet only 100 sf/person in the Rate Model.

At a minimum, the rate models should use an average of these three services (84.33 sf per person) rather than 50 sf per person for non medical and an average of 250 sf/person for medical management.
<table>
<thead>
<tr>
<th>Comment Topic</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Wages</strong></td>
<td>See general comments on geographic factors. The proposed rate models require a Registered Behavioral Technician certification for each DSP and the wage presented is significantly out of line with the requirements for such a position (<a href="https://www.bacb.com/rbt/rbt-requirements/">https://www.bacb.com/rbt/rbt-requirements/</a>). The attached Task List is the Behavior Analyst Certification Board’s outline of critical job functions for a Registered Behavioral Technician. The second attachment is a wage assumption mapping of these task list areas to appropriate BLS job codes and results in an average wage of $29.54/hour. See Table 7 for list of duties. This is in line with anecdotal reporting from current DD vendors that hire RBTs. The rate models should adopt this wage as the base wage for an RBT.</td>
</tr>
</tbody>
</table>
Table 7:

The BACB's Registered Behavior Technician™ (RBT™) Task List includes the primary tasks that are likely to be performed by behavior technicians with some, but not necessarily all, clients. It is at the discretion of an RBT supervisor to determine any activities outside of this task list that a behavior technician is competent to perform as a behavior technician.

The RBT Task List content serves as the basis for the RBT training requirements and the RBT examination. The Task List is organized into the following primary content areas: Measurement, Assessment, Skill Acquisition, Behavior Reduction, Documentation and Reporting, and Professional Conduct and Scope of Practice.

A. Measurement
A-1 Prepare for data collection.
A-2 Implement continuous measurement procedures (e.g., frequency, duration).
A-3 Implement discontinuous measurement procedures (e.g., partial, whole interval, momentary time sampling).
A-4 Implement permanent-product recording procedures.
A-5 Enter data and update graphs.
A-6 Describe behavior and environment in observable and measurable terms.

B. Assessment
B-1 Conduct preference assessments.
B-2 Assist with individualized assessment procedures (e.g., curriculum-based, developmental, social skills).
B-3 Assist with functional assessment procedures.

C. Skill Acquisition
C-1 Identify the essential components of a written skill acquisition plan.
C-2 Prepare for the session as required by the skill acquisition plan.
C-3 Use contingencies of reinforcement (e.g., conditioned/unconditioned reinforcement, continuous/intermittent schedules).
C-4 Implement discrete-trial teaching procedures.
C-5 Implement naturalistic teaching procedures (e.g., incidental teaching).
C-6 Implement task-analyzed chaining procedures.
C-7 Implement discrimination training.
C-8 Implement stimulus control transfer procedures.
C-9 Implement prompt and prompt fading procedures.
C-10 Implement generalization and maintenance procedures.
C-11 Implement shaping procedures.
C-12 Implement token economy procedures.
The BACB’s Registered Behavior Technician® (RBT®) Task List includes the primary tasks that are likely to be performed by behavior technicians with some, but not necessarily all, clients. It is at the discretion of an RBT supervisor to determine any activities outside of this task list that a behavior technician is competent to perform as a behavior technician.

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C-9 Implement prompt and prompt fading procedures.
C-10 Implement generalization and maintenance procedures.
C-11 Implement shaping procedures.
C-12 Implement token economy procedures.
### RBT Wage Assumptions

<table>
<thead>
<tr>
<th>DSP Area of Responsibility</th>
<th>SOC</th>
<th>SOC Code</th>
<th>wage</th>
<th>percent of time</th>
<th>weighted wage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Measurement</td>
<td>Medical Transcriptionist</td>
<td>31-9094</td>
<td>19.87</td>
<td>0.135</td>
<td>2.68245</td>
</tr>
<tr>
<td>Assessment</td>
<td>Education/Institute/College/Technical counselor</td>
<td>21-1012</td>
<td>33.15</td>
<td>0.11</td>
<td>3.6458</td>
</tr>
<tr>
<td>Skil Acqistion</td>
<td>Special education teachers, all other</td>
<td>25-2059</td>
<td>33.93</td>
<td>0.325</td>
<td>11.02725</td>
</tr>
<tr>
<td>Professional Conduct and Scope of Practice</td>
<td>Health Educator</td>
<td>21-1001</td>
<td>30.27</td>
<td>0.135</td>
<td>4.08045</td>
</tr>
</tbody>
</table>

### Wages (Alternative Assumptions)

Already existing in statute is a Behavior Technician - Paraprofessional, 1:2. In statute, the definition for this position is:

Behavior Management Technician (Paraprofessional) - Service Code 616. A regional center may vendor a group practice, vendored pursuant to Section 54319(d), for the above service. The Behavior Management Technician (Paraprofessional) shall practice under the direct supervision of a certified Behavior Analyst or a Behavior Management Consultant who is within the same vendored group practice. The Behavior Management Technician (Paraprofessional) implements instructional and environmental modifications to produce socially significant improvements in the consumer's behavior through skill acquisition and the reduction of behavior. The Behavior Management Technician (Paraprofessional) shall meet the following requirements:

1. Has a High School Diploma or the equivalent, has completed 30 hours of competency-based training designed by a certified behavior analyst, and has six months experience working with persons with developmental disabilities; or
(2) Possesses an Associate's Degree in either a human, social, or educational services discipline, or a degree or certification related to behavior management, from an accredited community college or educational institution, and has six months experience working with persons with developmental disabilities.

This position could be scaled at the same rate as LA Coalition’s recommendation for General DSP which is 19.94. See comparison worksheet for each model of service.

<table>
<thead>
<tr>
<th>Benefits</th>
</tr>
</thead>
<tbody>
<tr>
<td>The workers compensation rate reported for behavioral programs is significantly under the real cost for those programs. For instance,</td>
</tr>
<tr>
<td></td>
</tr>
</tbody>
</table>
| - From 2013-2019 PathPoint had a total of 116 worker’s compensation claims. Over 36% of that total (42 claims) came from one behavioral program that comprises just 5% of PathPoint’s staff. The majority of the injuries in that behavioral program were due to people served injuring staff. The workers compensation rate for that program is now 12.46%. A different behavioral program at PathPoint has a workers compensation rate of 11.07%.
- Similarly, UCPLA faces higher worker’s compensation rates due to medical support needs. Even with training and equipment, staff injuries resulting from lifting and specialized equipment do occur resulting in rate ranging between 10-12%.

The proposed rate models for behavioral programs should use workers compensation rates of at least 10%.

<table>
<thead>
<tr>
<th>Productivity Factors (Billable Hours)</th>
</tr>
</thead>
<tbody>
<tr>
<td>See comments from day programs on billable hours.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Productivity Factors (Attendance Rate)</th>
</tr>
</thead>
<tbody>
<tr>
<td>See comments from day programs on attendance rate.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Supervision and Program Operations</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Rate Model does not account for any additional infrastructure required to provide direct services. It appears that the entire service system will be delivered in pods of 1 supervisor to 10 staff without further program director or leadership. The Rate study should account for larger models of service by including a weighted average for supervision.</td>
</tr>
</tbody>
</table>

For example,
100% of a First Line Supervisor (included)
25% of Program Director (not included)
12.5% of a Regional Director (not included)
.0125% of a Chief Operating Officer (not included)

All of these positions or ones similarly (such as Support Plan Coordinators and Assistant Coordinators) are direct service positions responsible for the development and delivery of the ISP objectives, program outcomes including integration and employment in the
<table>
<thead>
<tr>
<th><strong>Community, quality assurance, intake/enrollment, customize Person-Centered Plans, and so forth.</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>These are not administrative roles</td>
</tr>
<tr>
<td><strong>Administration</strong></td>
</tr>
<tr>
<td><strong>Other (facility costs)</strong></td>
</tr>
<tr>
<td><strong>Other</strong></td>
</tr>
</tbody>
</table>
**RECOMMENDED RATE MODEL**

This worksheet suggests two different Rate Models. Once developed with the RBT rate (middle column and the other with the Paraprofessional Rate set at the same rate as a DSP with emphasis in Behavior Management Skills)

### Behavior Management, Community 1:2

**Service Code 515**

<table>
<thead>
<tr>
<th>Unit of Service</th>
<th>Base Model</th>
<th>TDS/ North LA</th>
<th>TDS/ North LA</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Hour</td>
<td>Hour</td>
<td>Hour</td>
</tr>
<tr>
<td>Direct Staff Hourly Wage</td>
<td>$16.33</td>
<td>$29.56</td>
<td>$19.54</td>
</tr>
<tr>
<td>Employee benefit rate (as a percent of wages)</td>
<td>24.85%</td>
<td>24.85%</td>
<td>24.85%</td>
</tr>
<tr>
<td>Workers’ Compensation Rate (as a percent of wages)</td>
<td>5.43%</td>
<td>5.43%</td>
<td>5.43%</td>
</tr>
<tr>
<td>Hourly Staff Cost before Productivity Adj. (wages + benefits)</td>
<td>$21.14</td>
<td>$38.51</td>
<td>$25.98</td>
</tr>
</tbody>
</table>

#### Productivity Adjustments

<table>
<thead>
<tr>
<th>Total Hours</th>
<th>Program Set-Up/Clean Up</th>
<th>4.00</th>
<th>4.00</th>
<th>4.00</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Recordkeeping and Reporting</td>
<td>0.89</td>
<td>0.89</td>
<td>0.89</td>
</tr>
<tr>
<td></td>
<td>Supervision and Other Employer Time</td>
<td>0.89</td>
<td>0.89</td>
<td>0.89</td>
</tr>
<tr>
<td></td>
<td>Training</td>
<td>0.67</td>
<td>0.67</td>
<td>0.67</td>
</tr>
<tr>
<td></td>
<td>Paid Time Off</td>
<td>3.85</td>
<td>4.88</td>
<td>4.88</td>
</tr>
<tr>
<td>&quot;Boppable&quot; Hours</td>
<td></td>
<td>$2.59</td>
<td>3.16</td>
<td>3.16</td>
</tr>
<tr>
<td>Productivity Factor</td>
<td></td>
<td>1.23</td>
<td>1.27</td>
<td>1.27</td>
</tr>
</tbody>
</table>

#### Staffing Ratio

- Group Size (Participants per Direct Support Staff): 2.00
- Participant Attendance Rate: 90.0%
- Adjusted Weighted Ave. of No. of Participants per Staff: 1.80

#### Staff Cost After Productivity Adj. per Billable Hour

<table>
<thead>
<tr>
<th></th>
<th>TDS/ North LA</th>
<th>TDS/ North LA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Annual Days of Program Operation</td>
<td>$250.0</td>
<td>$250.0</td>
</tr>
<tr>
<td>Annual Days of Participant Attendance</td>
<td>$225.0</td>
<td>$225.0</td>
</tr>
<tr>
<td>Hours per Day of Participant Attendance</td>
<td>6.0</td>
<td>6.0</td>
</tr>
<tr>
<td>Hours per Year of Participant Attendance</td>
<td>1,350</td>
<td>1,350</td>
</tr>
<tr>
<td>Amount per Mile</td>
<td>$2.69</td>
<td>$2.69</td>
</tr>
<tr>
<td>Number of Miles Traveled per Vehicle per Week</td>
<td>1.8</td>
<td>1.8</td>
</tr>
<tr>
<td>Number of Participants per Vehicle</td>
<td>263</td>
<td>263</td>
</tr>
<tr>
<td>Allocated Miles per Participant per Week</td>
<td>146.1</td>
<td>146.1</td>
</tr>
<tr>
<td>Annual Mileage Cost/Participant (at 246 days of operation)</td>
<td>$3,813.50</td>
<td>$3,813.50</td>
</tr>
<tr>
<td>Mileage Cost per Participant per Billable Hour</td>
<td>$1,750.00</td>
<td>$1,750.00</td>
</tr>
<tr>
<td>Square Feet of Service Space per Participant</td>
<td>100.0</td>
<td>100.0</td>
</tr>
<tr>
<td>Annual Facility Cost per Participant</td>
<td>$15,000.00</td>
<td>$15,000.00</td>
</tr>
<tr>
<td>Facilities Cost per Participant per Billable Hour</td>
<td>$3,000.00</td>
<td>$3,000.00</td>
</tr>
<tr>
<td>Supervisor Hourly Wage</td>
<td>$52.27</td>
<td>$52.27</td>
</tr>
<tr>
<td>Supervisor Benefit Rate (as a percent of wages)</td>
<td>13.23%</td>
<td>13.23%</td>
</tr>
<tr>
<td>Workers’ Compensation Rate (as a percent of wages)</td>
<td>4.33%</td>
<td>4.33%</td>
</tr>
<tr>
<td>Weekly Supervision Cost</td>
<td>$2,373.67</td>
<td>$2,373.67</td>
</tr>
<tr>
<td>Number of Direct Staff Supervised</td>
<td>10.0</td>
<td>10.0</td>
</tr>
<tr>
<td>Supervision Cost per Participant per Billable Hour</td>
<td>$2.06</td>
<td>$2.06</td>
</tr>
<tr>
<td>Cost per Hour, Before Program Operations &amp; Administration</td>
<td>$20.00</td>
<td>$20.00</td>
</tr>
<tr>
<td>Program Operations Cost per Billable Hour</td>
<td>$2.06</td>
<td>$2.06</td>
</tr>
<tr>
<td>Administrative Cost per Billable Hour</td>
<td>$3.46</td>
<td>$5.23</td>
</tr>
<tr>
<td>Rate per Billable Hour</td>
<td>$28.85</td>
<td>$43.59</td>
</tr>
</tbody>
</table>
**Wages**

See attached wage assumptions for a direct staff for the Supported Employment program. This position is responsible for developing relationships with employers and supporting individual’s learning and progression in paid employment. The Job Coach must make field-based decisions and be an expert resource for employers and persons served. The attached wage model shows that the base wage should be $24.81/hour.

**Benefits**

See general comments on benefits.

**Productivity Factors**

Time for collateral contacts is too low and a more realistic allotment is 15 minutes per day for 1.25 hours per week. As commented earlier, PTO should be 254 hours per year (4.88 hours per week) and rest breaks should be 1.67 hours per week as mandated by law.

**Supervision and Program Operations**

Inexplicitly, supervision is not included in the proposed rate models for Supported Employment, individual. The structure of Coalition programs is that we have the same degree of supervision for Supported Employment as we do for Day and Residential services. It is imperative that there be an exemplary supervisor to lead this program, not only supervising the job coaches but obtaining authorizations, scheduling and monitoring coaching hours, meeting with Regional Centers, coordinating with the Job Developer and managing the program. See earlier comments about an appropriate BLS job category for the supervisor as 11-9151, Social / Community Service Manager with a median salary of $32.13 per hour with additional infrastructure factored into weighted wage rate. See comments on Supervision.

**Supervision and Program Operations #2**

The Rate Model does not account for any additional infrastructure required to provide direct services. It appears that the entire service system will be delivered in pods of 1 supervisor to 10 staff without further program director or leadership. The Rate study should account for larger models of service by including a weighted average for supervision.

For example,
100% of a First Line Supervisor (included)
25% of Program Director (not included)
12.5% of a Regional Director (not included)  
.0125% of a Chief Operating Officer (not included)

All of these positions or ones similarly (such as Support Plan Coordinators and Assistant Coordinators) are direct service positions responsible for the development and delivery of the ISP objectives, program outcomes including integration and employment in the community, quality assurance, intake/enrollment, customize Person-Centered Plans, and so forth.

These are not administrative roles.

<table>
<thead>
<tr>
<th>Administration</th>
<th>See general comments on administration.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Other</td>
<td>The draft models proposed for Supported Employment did not include provisions for DSP 1, 2 and 3. We were pleased to see this corrected in the final rate models presented to the legislature.</td>
</tr>
<tr>
<td>DSP Area of Responsibility</td>
<td>SOC</td>
</tr>
<tr>
<td>----------------------------</td>
<td>-----</td>
</tr>
<tr>
<td>Establish positive...</td>
<td>Social / community service manager</td>
</tr>
<tr>
<td>Counsel...</td>
<td>Rehabilitation Counselors</td>
</tr>
<tr>
<td>Teach or instruct...</td>
<td>Self-Enrichment Teachers</td>
</tr>
<tr>
<td>Collaborate...</td>
<td>Educational, Guidance, and Career Counselors and Advisors</td>
</tr>
<tr>
<td>Assist mentally...</td>
<td>Psychiatric Aides</td>
</tr>
<tr>
<td>Perform administrative...</td>
<td>Medical Assistants</td>
</tr>
<tr>
<td>Under close supervision...</td>
<td>Physical Therapist Aides</td>
</tr>
<tr>
<td>Access community...</td>
<td>Special education teachers, all other</td>
</tr>
</tbody>
</table>

Total: 24.8125
# DDS Rate Study Public Comment – Specific Service Code

<table>
<thead>
<tr>
<th>Name</th>
<th>Los Angeles Coalition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Service Name/Code</td>
<td>Independent Living / 520, 894, 896</td>
</tr>
</tbody>
</table>

## Comment Topic

### Wages
See wage assumptions worksheet for a direct staff for the Independent Living program. This position is responsible for training and habilitation to support a person in successfully navigating the complexities of living independently. PathPoint’s direct care staff in this area do not focus on personal supports but rather on training and habilitation. The direct care staff must make important field-based decisions that directly impact the lives of the people served. The attached wage model shows that the base wage should be $20.66/hour. See Wage Assumptions.

### Benefits
See general comments on benefits.

### Productivity Factors
Time for travel between individuals should be at least 30 minutes per day. Allowing only 15 minutes each day is not sufficient when a direct care staff has multiple appointments, even if they are in the same city.

Due to the intensive record keeping requirements, direct care staff need at least 20 minutes per day for record-keeping. The current rate model allows just 11 minutes per day, which is insufficient. EVV requirements will likely increase this in the future as well.

As commented earlier, PTO should be 254 hours per year (4.88 hours per week) and rest breaks should be 1.67 hours per week as mandated by law.

### Supervision and Program Operations
See earlier comments about an appropriate BLS job category for the supervisor as 11-9151, Social / Community Service Manager with a median salary of $32.13 per hour.

### Supervision and Program Operations #2
The Rate Model does not account for any additional infrastructure required to provide direct services. It appears that the entire service system will be delivered in pods of 1 supervisor to 10 staff without further program director or leadership. The Rate study should account...
for larger models of service by including a weighted average for supervision.

For example,
100% of a First Line Supervisor (included)
25% of Program Director (not included)
12.5% of a Regional Director (not included)
.0125% of a Chief Operating Officer (not included)

All of these positions or ones similarly (such as Support Plan Coordinators and Assistant Coordinators) are direct service positions responsible for the development and delivery of the ISP objectives, program outcomes including integration and employment in the community, quality assurance, intake/enrollment, customize Person-Centered Plans, and so forth.

These are not administrative roles.

<table>
<thead>
<tr>
<th>Administration</th>
<th>See general comments on administration.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Other</td>
<td></td>
</tr>
<tr>
<td>DSP Area of Responsibility</td>
<td>SOC</td>
</tr>
<tr>
<td>----------------------------</td>
<td>-----</td>
</tr>
<tr>
<td>Counsel individuals to maximize the independence and employability of persons coping with personal, social, and vocational difficulties that result from birth defects, illness, disease, accidents, aging, or the stress of daily life. Coordinate activities for residents of care and treatment facilities. Assess client needs and design and implement rehabilitation programs that may include personal and vocational counseling, training, and job placement. Excludes “Occupational Therapists” (29-1112).</td>
<td>Rehabilitation Counselors</td>
</tr>
<tr>
<td>Teach or instruct individuals or groups for the primary purpose of self-enrichment or recreation, rather than for an occupational objective, educational attainment, competition, or fitness. Excludes “Coaches and Scouts” (27-2022) and “Exercise Trainers and Group Fitness Instructors” (39-9031). Flight instructors are included with “Aircraft Pilots and Flight Engineers” (53-2020).</td>
<td>Self-Enrichment Teachers</td>
</tr>
<tr>
<td>Collaborate with the individual and others in the development of an individualized instructional/service program to assist the individual to achieve skills and community behaviors necessary to succeed in desired employment (paid or volunteer) and community engagement activities, to assess and document progress, or, needs for instructional changes and to participate in ongoing progress assessment.</td>
<td>Educational, Guidance, and Career Counselors and Advisors</td>
</tr>
<tr>
<td>Assist mentally impaired or emotionally disturbed patients, working under direction of nursing and medical staff. May assist with daily living activities, lead patients in educational and recreational activities, or accompany patients to and from examinations and treatments. May restrain violent patients. Includes psychiatric aides.</td>
<td>Psychiatric Aides</td>
</tr>
<tr>
<td>Perform administrative and certain clinical duties under the direction of a physician. Administrative duties may include scheduling appointments, maintaining medical records, billing, and coding information for insurance purposes. Clinical duties may include taking and recording vital signs and medical histories, preparing patients for examination, drawing blood, and administering medications as directed by physician. Excludes “Physician Assistants” (29-1071).</td>
<td>Medical Assistants</td>
</tr>
<tr>
<td>Provide personal assistance to individuals with disabilities or illness who require help with personal care and activities of daily living support (e.g., feeding, bathing, dressing, grooming, toileting, and ambulation). May also provide help with tasks such as preparing meals, doing light housekeeping, and doing laundry. Work is performed in various settings depending on the needs of the care recipient and may include locations such as their home, place of work, out in the community, or at a daytime nonresidential facility.</td>
<td>Personal Care and Service Occupations</td>
</tr>
<tr>
<td>Under close supervision of a physical therapist or physical therapy assistant, perform only delegated, selected, or routine tasks in specific situations. These duties include preparing the patient and the treatment area.</td>
<td>Physical Therapist Aides</td>
</tr>
<tr>
<td>Assess community employment environments (paid or volunteer) and other community venues and to develop task analyses, instructional services and supports unique to the consumer’s learning/information processing capabilities.</td>
<td>Special education teachers, all other</td>
</tr>
</tbody>
</table>

| 1 | 20.456 |
MISSED MODELS OF SERVICE

LOS ANGELES COALITION
<table>
<thead>
<tr>
<th>Comment Topic</th>
</tr>
</thead>
</table>

**Overview**

A rate model does not exist for Project SEARCH, a highly successful national program being replicated across California. Project SEARCH is a year-long work-immersion program combining classroom instruction with real-life work experience in high-demand, complex industries such as healthcare and hospitality. The goal is for interns to graduate and find competitive, integrated employment and more than 70% do so each year. Project SEARCH fits the HCBS settings rule as it operates in a fully integrated setting and it leads to competitive integrated employment. The proposed rate models should include a rate for Project SEARCH and attached is a proposed rate model. The model is discussed in the comments below.

**Wages**

See attached wage assumptions for a direct staff for the Project SEARCH program. This position is responsible for significant relationship development with multiple departments within the host employer and with working with those partners to develop the vocational skills of the interns. The wage model shows that the base wage should be $22.49 per hour.
<table>
<thead>
<tr>
<th>DSP Area of Responsibility</th>
<th>SOC</th>
<th>SOC Code</th>
<th>wage</th>
<th>percent of time</th>
<th>weighted wage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Establish positive relationships with a variety of community entities including employers, social, recreational and cultural community organizations and so forth.</td>
<td>Social / community service manager</td>
<td>11-9151</td>
<td>32.13</td>
<td>0.15</td>
<td>4.8195</td>
</tr>
<tr>
<td>Counsel individuals to maximize the independence and employability of persons coping with personal, social, and vocational difficulties that result from birth defects, illness, disease, accidents, aging, or the stress of daily life. Coordinate activities for residents of care and treatment facilities. Assess client needs and design and implement rehabilitation programs that may include personal and vocational counseling, training, and job placement. Excludes &quot;Occupational Therapists&quot; (29-1122).</td>
<td>Rehabilitation Counselors</td>
<td>21-1015</td>
<td>17.2</td>
<td>0.31</td>
<td>5.332</td>
</tr>
<tr>
<td>Teach or instruct individuals or groups for the primary purpose of self-enrichment or recreation, rather than for an occupational objective, educational attainment, competition, or fitness. Excludes &quot;Coaches and Scouts&quot; (27-2022) and &quot;Exercise Trainers and Group Fitness Instructors&quot; (39-9031). Flight instructors are included with &quot;Aircraft Pilots and Flight Engineers&quot; (53-6010).</td>
<td>Self-Enrichment Teachers</td>
<td>25-3021</td>
<td>23.29</td>
<td>0.35</td>
<td>8.1515</td>
</tr>
<tr>
<td>Collaborate with the individual and others in the development of an individualized instructional/service program to assist the individual to achieve skills and community behaviors necessary to succeed in desired employment (paid or volunteer) and community engagement activities, to assess and document progress, or, needs for instructional changes and to participate in ongoing progress assessment.</td>
<td>Educational, Guidance, and Career Counselors and Advisors</td>
<td>21-1012</td>
<td>33.18</td>
<td>0.04</td>
<td>1.3272</td>
</tr>
<tr>
<td>Assist mentally impaired or emotionally disturbed patients, working under direction of nursing and medical staff. May assist with daily living activities, lead patients in educational and recreational activities, or accompany patients to and from examinations and treatments. May restrain violent patients. Includes psychiatric orderlies.</td>
<td>Psychiatric Aides</td>
<td>31-1013</td>
<td>15.84</td>
<td>0.03</td>
<td>0.4692</td>
</tr>
<tr>
<td>Perform administrative and certain clinical duties under the direction of a physician. Administrative duties may include scheduling appointments, maintaining medical records, billing, and coding information for insurance purposes. Clinical duties may include taking and recording vital signs and medical histories, preparing patients for examination, drawing blood, and administering medications as directed by physician. Excludes &quot;Physician Assistants&quot; (29-1071).</td>
<td>Medical Assistants</td>
<td>31-9092</td>
<td>17.31</td>
<td>0.05</td>
<td>0.8655</td>
</tr>
<tr>
<td>Under close supervision of a physical therapist or physical therapy assistant, perform only delegated, selected, or routine tasks in specific situations. These duties include preparing the patient and the treatment area.</td>
<td>Physical Therapist Aides</td>
<td>31-2022</td>
<td>15.44</td>
<td>0.05</td>
<td>0.772</td>
</tr>
<tr>
<td>Assess community employment environments (paid or volunteer) and other community venues and to develop task analyses, instructional services and supports unique to the consumer's learning/information processing modalities.</td>
<td>Special education teachers, all other</td>
<td>25-2059</td>
<td>37.5</td>
<td>0.02</td>
<td>0.75</td>
</tr>
</tbody>
</table>

1 | 22.4869 |
<table>
<thead>
<tr>
<th>Benefits</th>
<th>Benefits are adjusted using page C-2 of the proposed rate models.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Productivity Factors</td>
<td>As commented in the general comments, it is not legal to have more than 30 billable hours in a day program. Adjustments were made to include 100 minutes of non billable and legally mandated rest breaks, and 254 hours of PTO per the earlier general comments. As discussed earlier, attendance rate of 90% is not realistic, especially with hourly billing. Attendance is better at Project Search than a typical day program so rate was lowered only to 80%.</td>
</tr>
<tr>
<td>Supervision and Program Operations</td>
<td>See earlier comments about a more appropriate BLS job category for the supervisor as 11-9151, Social / Community Service Manager with a median salary of $32.13 per hour.</td>
</tr>
<tr>
<td>Supervision and Program Operations #2</td>
<td>The Rate Model does not account for any additional infrastructure required to provide direct services. It appears that the entire service system will be delivered in pods of 1 supervisor to 10 staff without further program director or leadership. The Rate study should account for larger models of service by including a weighted average for supervision. For example, 100% of a First Line Supervisor (included) 25% of Program Director (not included) 12.5% of a Regional Director (not included) .0125% of a Chief Operating Officer (not included) All of these positions or ones similarly (such as Support Plan Coordinators and Assistant Coordinators) are direct service positions responsible for the development and delivery of the ISP objectives, program outcomes including integration and employment in the community, quality assurance, intake/enrollment, customize Person-Centered Plans, and so forth. These are not administrative roles.</td>
</tr>
<tr>
<td>Administration</td>
<td>Per earlier comments, administration entered at 15% for this rate model.</td>
</tr>
<tr>
<td>Other</td>
<td>There is no mileage as program is based at an employer's facility. There are no facility costs to the vendor as the employer provides space for the program to meet at its facility.</td>
</tr>
</tbody>
</table>
# PROJECT SEARCH RATE MODEL

<table>
<thead>
<tr>
<th>Units of Service</th>
<th>Base Model</th>
</tr>
</thead>
<tbody>
<tr>
<td>Direct Staff Hourly Wage</td>
<td>$ 23.12</td>
</tr>
<tr>
<td>Employee Benefit Rate (as a percent of wages)</td>
<td>19.79%</td>
</tr>
<tr>
<td>Workers' Compensation Rate (as a percent of wages)</td>
<td>5.43%</td>
</tr>
<tr>
<td>Hourly Staff Cost Before Productivity Adj. (wages + benefits)</td>
<td>$ 23.95</td>
</tr>
</tbody>
</table>

**Productivity Adjustments**

<table>
<thead>
<tr>
<th>Total Hours</th>
<th>40.00</th>
</tr>
</thead>
<tbody>
<tr>
<td>Program Set-Up/Clean-Up</td>
<td>0.89</td>
</tr>
<tr>
<td>Recordkeeping and Reporting</td>
<td>1.11</td>
</tr>
<tr>
<td>Supervision and Other Employer Time</td>
<td>0.83</td>
</tr>
<tr>
<td>Training</td>
<td>0.67</td>
</tr>
<tr>
<td>Rest breaks (two 10-minute breaks per day)</td>
<td>1.67</td>
</tr>
<tr>
<td>Paid Time Off</td>
<td>4.88</td>
</tr>
<tr>
<td>&quot;Billable&quot; Hours</td>
<td>29.89</td>
</tr>
<tr>
<td>Productivity Factor</td>
<td>1.34</td>
</tr>
</tbody>
</table>

**Staffing Rate**

<table>
<thead>
<tr>
<th>Group Size (Participants per Direct Support Staff)</th>
<th>3.0</th>
</tr>
</thead>
<tbody>
<tr>
<td>Participant Attendance Rate</td>
<td>80%</td>
</tr>
<tr>
<td>Adjusted Weighted Avg. of No. of Participants per Staff</td>
<td>2.4</td>
</tr>
</tbody>
</table>

**Staff Cost After Productivity Adj. per Billable Hour** $ 16.15

## Attendance

<table>
<thead>
<tr>
<th>Annual Days of Program Operations</th>
<th>250.00</th>
</tr>
</thead>
<tbody>
<tr>
<td>Annual Days of Participant Attendance</td>
<td>200.00</td>
</tr>
<tr>
<td>Hours per Day of Participant Attendance</td>
<td>6.00</td>
</tr>
<tr>
<td>Hours per year of Participant Attendance</td>
<td>1,200</td>
</tr>
</tbody>
</table>

**Mileage**

<table>
<thead>
<tr>
<th>Amount per mile</th>
<th>$ 0.58</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of Miles Traveled per Week</td>
<td>0</td>
</tr>
<tr>
<td>Number of Participants per vehicle</td>
<td>2.70</td>
</tr>
<tr>
<td>Allocated Miles per Participant per Week</td>
<td>0.0</td>
</tr>
<tr>
<td>Annual Mileage Cost/Participant (at 246 days of operation)</td>
<td>$ 1.565.37</td>
</tr>
<tr>
<td>Mileage Cost per Billable Hour</td>
<td>$ -</td>
</tr>
</tbody>
</table>

**Facility**

<table>
<thead>
<tr>
<th>Square Feet of Service Space per Participant</th>
<th>0</th>
</tr>
</thead>
<tbody>
<tr>
<td>Annual Cost per Square Foot</td>
<td>$ 15.00</td>
</tr>
<tr>
<td>Annual Facility Cost per Participant</td>
<td>$ -</td>
</tr>
<tr>
<td>Facility Cost per Participant per Billable Hour</td>
<td>$ -</td>
</tr>
</tbody>
</table>

**Supervision**

<table>
<thead>
<tr>
<th>Supervisor Hourly Wage</th>
<th>$ 32.13</th>
</tr>
</thead>
<tbody>
<tr>
<td>Supervisor Benefit Rate (as a percent of wages)</td>
<td>16.37%</td>
</tr>
<tr>
<td>Workers' Compensation Rate (as a percent of wages)</td>
<td>5.43%</td>
</tr>
<tr>
<td>Weekly Supervision Cost</td>
<td>$ 1,565.37</td>
</tr>
<tr>
<td>Number of Direct Staff Supervised</td>
<td>1.0</td>
</tr>
<tr>
<td>Supervision Cost per Participant per Billable Hour</td>
<td>$ 1.92</td>
</tr>
</tbody>
</table>

**Admin and Program Operations**

<table>
<thead>
<tr>
<th>Cost per Hour, Before Program Operations &amp; Administration</th>
<th>$ 19.07</th>
</tr>
</thead>
<tbody>
<tr>
<td>Daily Program Operations Costs</td>
<td>$ 29.00</td>
</tr>
<tr>
<td>Program Operations Cost per Billable Hour</td>
<td>$ 1.49</td>
</tr>
<tr>
<td>Administration Percent</td>
<td>15%</td>
</tr>
<tr>
<td>Administration Cost per Billable Hour</td>
<td>$ 3.63</td>
</tr>
<tr>
<td>Rate per Billable Hour</td>
<td>$ 24.18</td>
</tr>
</tbody>
</table>
| Overview | A rate model does not exist for College to Career Services, a unique resource in the National THINK COLLEGE model of service. For example, Tierra del Sol highly successful program is being replicated across California. C2C services are provided in real-time in real-context. Each student is co-enrolled in both the Community College of choice or the University of choice. A COLLEGE-TO-CAREER PROGRAM Based-model is founded on individualized support based on each participant's strengths. It uses time-limited, career-oriented training to allow adults, with moderate to severe developmental disabilities, to find their path and grow into their own lives as successful adults within their community and family. The result of this is community-based employment, which pays at or above minimum wage.

As a component of C2C services, students have an Academic Coach (Direct Support Professional) joining them on campus and in class, based on the amount of support necessary to access/learn the information/skills presented for each student. Each Coach can support up to 3 individuals per semester.

The coach may:

- **Attend class to provide “as-needed”**
  - Re-direction support for students developing a greater level of “On-Task” awareness
  - Note-taking support
  - Observation and monitoring of student participation/skill acquisition/assignment completion

- **Work with students outside of class**
  - Study Skills/Test Preparation
  - Organizational Skills
  - Time Management
  - Stress/Anxiety Management Skills/Techniques
  - Resource exploration

- **Cooperatively partner with Staff/Instructors**
  - Facilitate conversations between Staff, the Program, Instructors, and Students.
  - Communication of Needs/Concerns
  - Consultation on techniques for working with students with disabilities

- **Awareness of classroom culture/flow**
  - Discuss protocol/expectations with students |
| Wages | See attached wage assumptions for a direct staff for the C2C services. The primary skill set of the C2C DSP is to:
Evaluate students’ abilities and interests through aptitude assessments, interviews, and individual planning. Identify issues that affect school performance, such as poor classroom attendance rates. Help students understand and overcome social or behavioral problems through classroom guidance lessons. Work with students to develop skills, such as organizational and time management abilities and effective study habits. Help students create a plan to achieve academic and career goals. Collaborate with teachers, administrators, and parents to help students succeed. Teach students and school staff about specific topics, such as bullying, drug abuse, and planning for careers after graduation. Collaborate with the individual and others in the development of an individualized instructional/service program to assist the individual to achieve skills and community behaviors necessary to succeed in desired employment (paid or volunteer) and community engagement activities, to assess and document progress, or, needs for instructional changes and to participate in ongoing progress assessment. Maintain records as required. Report possible cases of neglect or abuse and refer students and parents to resources outside the school for additional support.

**A Bachelor’s degree is required.**
The wage model shows that the base wage should be $21.76 per hour. SEE C2C WAGE ASSUMPTIONS |
<table>
<thead>
<tr>
<th>DSP Area of Responsibility</th>
<th>SOC</th>
<th>SOC Code</th>
<th>wage</th>
<th>percent of time</th>
<th>weighted wage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Evaluate students' abilities and interests through attitude assessments, interviews, and</td>
<td>Educational, Guidance, and Career Counsellors and Advisors</td>
<td>21-1012</td>
<td>35.51</td>
<td>0.15</td>
<td>5.2265</td>
</tr>
<tr>
<td>individual planning. Identify issues that affect school performance, such as poor</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>classroom attendance rates. Help students understand and overcome social or behavioral</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>problems through classroom guidance lessons. Work with students to develop skills, such</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>as organizational and time management abilities and effective study habits. Help students</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>create a plan to achieve academic and career goals. Collaborate with teachers,</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>administrators, and parents to help students succeed. Teach students and school staff</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>about specific topics, such as bullying, drug abuse, and planning for careers after</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>graduation. Collaborate with the individual and others in the development of an</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>individualized instructional/service program to assist the individual to achieve skills</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>and community behaviors necessary to succeed in desired employment (paid or volunteer)</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>and community engagement activities, to assess and document progress, or needs for</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>instructional changes and to participate in ongoing progress assessment. Maintain records</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>as required. Report possible cases of neglect or abuse and refer students and parents to</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>resources outside the school for additional support. Bachelor's Degree Required.</td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Counsel individuals to maximize the independence and employability of persons coping with</td>
<td>Rehabilitation Counselors</td>
<td>21-1015</td>
<td>17.2</td>
<td>0.3</td>
<td>5.16</td>
</tr>
<tr>
<td>personal, social, and vocational difficulties that result from birth defects, illness,</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>disease, accidents, aging, or the stress of daily life. Coordinate activities for</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>residents of care and treatment facilities. Assess client needs and design and implement</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>rehabilitation programs that may include personal and vocational counseling, training, and</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>job placement. Excludes &quot;Occupational Therapists&quot; (29-1172).</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Teach or instruct individuals or groups for the primary purpose of self-enrichment or</td>
<td>Self-Enrichment Teachers</td>
<td>25-3021</td>
<td>23.29</td>
<td>0.3</td>
<td>6.887</td>
</tr>
<tr>
<td>recreation, rather than for an occupational objective, educational attainment,</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>competition, or fitness. Excludes &quot;Cooks and Chaufiers&quot; (27-3011) and &quot;Exercise</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>&quot;Trainers and Group Fitness Instructors&quot; (36-3031). Flight instructors are included</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>with &quot;Aircraft Pilots and Flight Engineers&quot; (35-2041).</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Assist mentally impaired or emotionally disturbed patients, working under direction of</td>
<td>Psychiatric Aides</td>
<td>31-1013</td>
<td>15.64</td>
<td>0.03</td>
<td>0.4892</td>
</tr>
<tr>
<td>nursing and medical staff. May assist with daily living activities, lead patients in</td>
<td></td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>educational and recreational activities, or accompany patients to and from examinations</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>and treatments. May restrain violent patients. Includes psychiatric disorders.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Perform administrative and certain clinical duties under the direction of a physician.</td>
<td>Medical Assistants</td>
<td>31-9092</td>
<td>17.31</td>
<td>0.05</td>
<td>0.8655</td>
</tr>
<tr>
<td>Administrative duties may include scheduling appointments, maintaining medical records,</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>billing, and coding information for insurance purposes. Clinical duties may include</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>taking and recording vital signs and medical histories, preparing patients for exams,</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>drawing blood, and administering medications as directed by physician. Excludes &quot;Physician</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Assistants&quot; (29-1071).</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Provide personalized assistance to individuals with disabilities or illnesses who require</td>
<td>Personal Care and Service Occupations</td>
<td>39-2000</td>
<td>14.26</td>
<td>0.1</td>
<td>1.426</td>
</tr>
<tr>
<td>help with personal care and activities of daily living support (e.g. feeding, bathing,</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>dressing, grooming, toileting, and ambulation). May also provide help with tasks such</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>as preparing meals, doing light housekeeping, and doing laundry. Work is performed in</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>various settings depending on the needs of the care recipient and may include locations</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>such as their home, place of work, out in the community, or at a day care or residential</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>facility.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Under close supervision of a physical therapist or physical therapy assistant, perform</td>
<td>Physical Therapist Aides</td>
<td>31-2022</td>
<td>15.44</td>
<td>0.05</td>
<td>0.772</td>
</tr>
<tr>
<td>only delegated, selected, or routine tasks in specific situations. These duties include</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>preparing and assisting the patient and the treatment area.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Assess community employment environments (paid or volunteer) and other community venues</td>
<td>Special Education Teachers, all other</td>
<td>25-2059</td>
<td>37.5</td>
<td>0.02</td>
<td>0.75</td>
</tr>
<tr>
<td>and to develop task analyses, instructional services and supports unique to the consumer's</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>learning/information processing modalities.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Total: 21.7962
<table>
<thead>
<tr>
<th>Benefits</th>
<th>Benefits are adjusted using page C-2 of the proposed rate models.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Productivity Factors</td>
<td>As commented in the general comments, it is not legal to have more than 30 billable hours in a day program. Adjustments were made to include 100 minutes of non billable and legally mandated rest breaks, and 254 hours of PTO per the earlier general comments. As discussed earlier, attendance rate of 90% is not realistic, especially with hourly billing. Attendance is better in the College to Career Model than a typical day program so rate was lowered only to 80%.</td>
</tr>
<tr>
<td>Supervision and Program Operations</td>
<td>See earlier comments about a more appropriate BLS job category for the supervisor as 11-9151, Social / Community Service Manager with a median salary of $32.13 per hour.</td>
</tr>
</tbody>
</table>
| Supervision and Program Operations #2 | The Rate Model does not account for any additional infrastructure required to provide direct services. It appears that the entire service system will be delivered in pods of 1 supervisor to 10 staff without further program director or leadership. The Rate study should account for larger models of service by including a weighted average for supervision.  

For example,  
100% of a First Line Supervisor (included)  
25% of Program Director (not included)  
12.5% of a Regional Director (not included)  
.0125% of a Chief Operating Officer (not included)  

All of these positions or ones similarly (such as Support Plan Coordinators and Assistant Coordinators) are direct service positions responsible for the development and delivery of the ISP objectives, program outcomes including integration and employment in the community, quality assurance, intake/enrollment, customize Person-Centered Plans, and so forth.  

These are not administrative roles |
| Administration | See general comments. |
| Other | There is no mileage as program is based at an employer's facility. There are no facility costs to the vendor as the employer provides space for the program to meet at its facility. |
## COLLEGE TO CAREER RATE MODEL:

### COLLEGE TO CAREER PROGRAM, 1:3

**SERVICE CODE: 055**

<table>
<thead>
<tr>
<th>Unit of Service</th>
<th>Base Model</th>
<th>TDS/ North LA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Direct Staff Hourly Wage</td>
<td>$14.89</td>
<td>$21.71</td>
</tr>
<tr>
<td>Employee Benefit Rate (as a percent of wages)</td>
<td>26.40%</td>
<td>26.40%</td>
</tr>
<tr>
<td>Workers' Compensation Rate (as a percent of wages)</td>
<td>5.43%</td>
<td>5.43%</td>
</tr>
<tr>
<td>Hourly Staff Cost Before Productivity Adj. (wages + benefits)</td>
<td>$19.66</td>
<td>$28.62</td>
</tr>
</tbody>
</table>

### Productivity Adjustments

<table>
<thead>
<tr>
<th>Total Hours</th>
<th>40.00</th>
<th>40.00</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Program Set Up/Clean Up</td>
<td>1.11</td>
<td>0.00</td>
</tr>
<tr>
<td>- Recordkeeping and Reporting</td>
<td>1.11</td>
<td>2.50</td>
</tr>
<tr>
<td>- Supervision and Other Employer Time</td>
<td>0.89</td>
<td>2.00</td>
</tr>
<tr>
<td>- Training</td>
<td>0.62</td>
<td>1.06</td>
</tr>
<tr>
<td>- Paid Time Off</td>
<td>3.85</td>
<td>4.88</td>
</tr>
<tr>
<td><em>Billable</em> Hours</td>
<td>32.37</td>
<td>29.62</td>
</tr>
</tbody>
</table>

### Productivity Factor

- 1.24 | 1.35 |

### Staffing Ratio

- Group Size (Participants per Direct Support Staff) | 3.00 | 3.00 |
- Participant Attendance Rate | 90.0% | 75.0% |
- Adjusted Weighted Ave. of No. of Participants per Staff | 2.70 | 2.25 |

### Staff Cost After Productivity Adj. per Billable Hour

- Annual Days of Program Operation | 250.0 | 250.0 |
- Annual Days of Participant Attendance | 225.0 | 187.5 |
- Hours per Day of Participant Attendance | 6.0 | 4.9 |
- Hours per Year of Participant Attendance | 1,350.0 | 919.0 |

### Amount per Mile

<p>| | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of Miles Traveled per Vehicle per Week</td>
<td>250</td>
<td>0</td>
</tr>
<tr>
<td>Number of Participants per Vehicle</td>
<td>2.7</td>
<td>0.0</td>
</tr>
</tbody>
</table>

### Allocated Miles per Participant per Week

- 92.6 | 0.0 |

### Annual Mileage Cost/Participant (at 246 days of operation)

- $2,436.85 | - |

### Mileage Cost per Participant per Billable Hour

- $1.79 | - |

### - Square Feet of Service Space per Participant |

- 50.0 | 50.0 |

### Annual Cost per Square Foot

- $15.00 | $17.25 |

### Annual Facility Cost per Participant

- $750.00 | $862.50 |

### Facility Cost per Participant per Billable Hour

- $0.56 | $0.94 |

### - Supervisor Hourly Wage |

- $21.04 | $41.03 |

### - Supervisor Benefit Rate (as a percent of wages)

- 20.92% | 20.92% |

### - Workers' Compensation Rate (as a percent of wages)

- 5.43% | 5.43% |

### Weekly Supervision Cost

- $1,063.36 | $2,073.71 |

### Number of Direct Staff Supervised

- 10.0 | 10.0 |

### Supervision Cost per Participant per Billable Hour

- $21.52 | $52.22 |

### Cost per Hour: Before Program Operations & Administration

- $12.89 | $23.33 |

### Daily Program Operations Costs

- $20.00 | $20.00 |

### Program Operations Cost per Billable Hour

- 1.37 | 2.42 |

### Administrative Cost per Billable Hour

- 12.00% | 12.00% |

### Rate per Billable Hour

- $16.20 | $29.37 |

---

This is based on the TDS wage assumption. Therefore, no mileage needed.

See attached schedule for service infrastructure.
### SUPERVISION

**COLLEGE TO CAREER PROGRAM, 1:3**  
**SERVICE CODE 055**

#### SUPERVISORY RESOURCES REQUIRED

<table>
<thead>
<tr>
<th>Supervisory Function</th>
<th>Base Wage</th>
<th>Allocation</th>
<th>Rate Per Billable Hour</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.33 Program Director</td>
<td>$75,000</td>
<td></td>
<td>$11.90</td>
</tr>
<tr>
<td>1 Program Manager</td>
<td>$60,000</td>
<td></td>
<td>$28.85</td>
</tr>
<tr>
<td>Chief Clinical Officer (for 150 clients)</td>
<td>22%</td>
<td></td>
<td>$0.08</td>
</tr>
<tr>
<td>Regional Director (for 150 clients)</td>
<td>70%</td>
<td></td>
<td>$0.20</td>
</tr>
</tbody>
</table>

**Total: $41.03**
These services are specifically designed to offer a supported mainstream life experience to participants who demonstrate the desire and potential to succeed in a community-based, paid or unpaid work and life experiences. The support provided through these services will encourage participants to engage in community, social, leisure and cultural opportunities that would not generally be available in a segregated service model. These services offer more than simply community presence. They are designed to help people get “on track” to meaningful and productive citizenship. The mainstay of these services is a regular schedule of integrated community engagement, including volunteerism in an area of personal interest to the participant, and access to cultural opportunities throughout the Los Angeles and San Bernardino basins. Meaningful community service provides the principal context in which active vocational skills are taught. In addition to its importance for work experience and resume building, community volunteerism, along with social –recreational activities, cultural activities and continuing education courses, provide a rich array of opportunities to provide social-interpersonal skills and community utilization skills training. The entire lifestyle presents opportunities for participants to come into regular and mutually valued contact with community members who share similar interests and values. This is a prerequisite for the building of new friendships. Staff will utilize systematic tools and techniques to teach participants how to discriminate between potentially negative and positive socialization opportunities, and will “coach” participants in the techniques of conversation and friendship building.

The Los Angeles Coalition is actively working toward the day when people with any type of disability are fully recognized as an integral part of our community – as neighbors, co-workers, and contributors. From this, we encourage all of its participants to find pathways to employment that will launch each person out of poverty conditions which clearly exist for persons solely receiving Social Security Income.

Person-Centered Services are the architecture providing effective and innovative opportunities for adults, who have developmental disabilities, to discover, explore, choose and train for individually meaningful careers. All of Tierra’s services specialize in designing a full tapestry of supports for a person to develop skills for the following:
- employment and earning sustainable income,
- navigating the community, expanding his/her education,
- advancing personal connections and enjoying choices to contribute socially,
- building a range of skills that enhances a life-style of empowerment, acceptance, inclusion, and value.

<table>
<thead>
<tr>
<th>Wages</th>
<th>See DSP wage assumptions. This position is responsible for significant relationship development with multiple departments within the host employer and with working with those partners to develop the vocational skills of the participants. The wage model shows that the base wage should be $19.94 per hour.</th>
</tr>
</thead>
</table>

| Wage Outcomes: | See attached wage assumptions for a direct staff for the C2C services. In Customized Employment, we believe that with the right job matching and support, everyone can work. |

**Types of Work**

- **Individual Supported Employment**
  - People who can work on their own or with limited support (up to 20%) may be a good fit for Supported Employment. These are individual placements developed for each person.
- **Group Supported Work**
  - Group opportunities are developed for individuals who need the support of a full-time job DSP.
- **Paid Internship Program**
  - Individual or Group short-term paid opportunities that are developed for individuals who specify the Paid Internship goal in his/her IPP.
- **Training Site**
  - Various sites (such as the car wash) are intentionally short-term to enable an individual to sharpen his/her skills.
- **Work-to-Career Volunteerism**
  - Volunteerism provides an important pathway to employment. Volunteer sites are categorized based on the skills they develop.
    - Volunteer sites that provide **short-term intensive vocational training** are ideal for individuals who are close to employment. They provide the intensive experience that parallels what would be expected of individuals who are working at a paid site.
    - Volunteer sites that provide **capacity-building vocational training** enable people who have specific competency development goals to experience a
work setting, while providing the flexibility to focus on specific goals.

- **Quality of Life Volunteerism**
  - Some individuals (such as those in retirement) may benefit from volunteerism that allows them to positively impact the community, develop relationships, and enhance their quality of life.

<table>
<thead>
<tr>
<th>Benefits</th>
<th>Benefits are adjusted using page C-2 of the proposed rate models.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Productivity Factors</td>
<td>As commented in the general comments, it is not legal to have more than 30 billable hours in a day program. Adjustments were made to include 100 minutes of non billable and legally mandated rest breaks, and 254 hours of PTO per the earlier general comments. As discussed earlier, attendance rate of 90% is not realistic, especially with hourly billing. Attendance is better in Customized Employment than a typical day program so rate was lowered only to 80%.</td>
</tr>
<tr>
<td>Supervision and Program Operations</td>
<td>See earlier comments about a more appropriate BLS job category for the supervisor as 11-9151, Social / Community Service Manager with a median salary of $32.13 per hour.</td>
</tr>
<tr>
<td>Supervision and Program Operations #2</td>
<td>The Rate Model does not account for any additional infrastructure required to provide direct services. It appears that the entire service system will be delivered in pods of 1 supervisor to 10 staff without further program director or leadership. The Rate study should account for larger models of service by including a weighted average for supervision. For example, 100% of a First Line Supervisor (included) 25% of Program Director (not included) 12.5% of a Regional Director (not included) .0125% of a Chief Operating Officer (not included) All of these positions or ones similarly (such as Support Plan Coordinators and Assistant Coordinators) are direct service positions responsible for the development and delivery of the ISP objectives, program outcomes including integration and employment in the community, quality assurance, intake/enrollment, customize Person-Centered Plans, and so forth. These are not administrative roles</td>
</tr>
<tr>
<td>Administration</td>
<td>See general comments.</td>
</tr>
<tr>
<td>Other</td>
<td></td>
</tr>
</tbody>
</table>
## Customize Employment Rate Model 1:3

### COMMUNITY-BASED DAY PROGRAMS, CAREER FOCUSED VOLUNTEERISM/INTERNSHIP 1:3

#### 1:3 PROGRAM

<table>
<thead>
<tr>
<th>Unit of Service</th>
<th>Base Model</th>
<th>TDS</th>
<th>North LA</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Hour</td>
<td>Hour</td>
<td>Hour</td>
</tr>
<tr>
<td>Direct Staff Hourly Wage</td>
<td>$14.89</td>
<td>$19.94</td>
<td></td>
</tr>
<tr>
<td>Employee Benefit Rate (as a percent of wages)</td>
<td>26.40%</td>
<td>26.40%</td>
<td></td>
</tr>
<tr>
<td>Workers’ Compensation Rate (as a percent of wages)</td>
<td>5.43%</td>
<td>5.43%</td>
<td></td>
</tr>
<tr>
<td>Hourly Staff Cost Before Productivity Adj. (wages + benefits)</td>
<td>$13.63</td>
<td>$16.28</td>
<td></td>
</tr>
<tr>
<td>Productivity Adjustments</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Hours</td>
<td>40.00</td>
<td>40.00</td>
<td></td>
</tr>
<tr>
<td>- Program Set-Up/Clean Up</td>
<td>1.11</td>
<td>1.11</td>
<td></td>
</tr>
<tr>
<td>- Recordkeeping and Reporting</td>
<td>1.11</td>
<td>0.89</td>
<td></td>
</tr>
<tr>
<td>- Supervision and Other Employer Time</td>
<td>0.89</td>
<td>0.89</td>
<td></td>
</tr>
<tr>
<td>- Training</td>
<td>0.67</td>
<td>0.67</td>
<td></td>
</tr>
<tr>
<td>- Paid Time Off</td>
<td>3.85</td>
<td>4.88</td>
<td></td>
</tr>
<tr>
<td>&quot;Billable&quot; Hours</td>
<td>32.37</td>
<td>31.56</td>
<td></td>
</tr>
<tr>
<td>Productivity Factor</td>
<td>1.24</td>
<td>1.27</td>
<td></td>
</tr>
<tr>
<td>Staffing Ratio</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Group Size (Participants per Direct Support Staff)</td>
<td>3.00</td>
<td>3.00</td>
<td></td>
</tr>
<tr>
<td>- Participant Attendance Rate</td>
<td>80.90%</td>
<td>80.90%</td>
<td></td>
</tr>
<tr>
<td>- Adjusted Weighted Ave. of No. of Participants per Staff</td>
<td>2.70</td>
<td>2.40</td>
<td></td>
</tr>
<tr>
<td>Staff Cost After Productivity Adj. per Billable Hour</td>
<td>$9.02</td>
<td>$13.88</td>
<td></td>
</tr>
<tr>
<td>- Annual Days of Program Operation</td>
<td>250.0</td>
<td>250.0</td>
<td></td>
</tr>
<tr>
<td>- Annual Days of Participant Attendance</td>
<td>225.0</td>
<td>220.0</td>
<td></td>
</tr>
<tr>
<td>- Hours per Day of Participant Attendance</td>
<td>6.0</td>
<td>6.0</td>
<td></td>
</tr>
<tr>
<td>Hours per Year of Participant Attendance</td>
<td>1350.0</td>
<td>1200.0</td>
<td></td>
</tr>
<tr>
<td>Amount per Mile</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Number of Miles Traveled per Vehicle per Week</td>
<td>$0.580</td>
<td>$0.580</td>
<td></td>
</tr>
<tr>
<td>- Number of Participants per Vehicle</td>
<td>250.0</td>
<td>263.0</td>
<td></td>
</tr>
<tr>
<td>Allocated Miles per Participant per Week</td>
<td>92.6</td>
<td>199.5</td>
<td></td>
</tr>
<tr>
<td>Annual Mileage Cost/Participant (at 246 days of operation)</td>
<td>$2,416.67</td>
<td>$2,542.33</td>
<td></td>
</tr>
<tr>
<td>Mileage Cost per Participant per Billable Hour</td>
<td>$1.79</td>
<td>$2.12</td>
<td></td>
</tr>
<tr>
<td>- Square Feet of Service Space per Participant</td>
<td>50.0</td>
<td>50.0</td>
<td></td>
</tr>
<tr>
<td>- Annual Cost per Square Foot</td>
<td>$15.00</td>
<td>$17.25</td>
<td></td>
</tr>
<tr>
<td>Annual Facility Cost/Participant</td>
<td>$750.00</td>
<td>$882.50</td>
<td></td>
</tr>
<tr>
<td>Facility Cost per Participant per Billable Hour</td>
<td>$0.56</td>
<td>$0.72</td>
<td></td>
</tr>
<tr>
<td>- Supervisor Hourly Wage</td>
<td>$21.04</td>
<td>$24.79</td>
<td></td>
</tr>
<tr>
<td>- Supervisor Benefit Rate (as a percent of wages)</td>
<td>20.92%</td>
<td>20.92%</td>
<td></td>
</tr>
<tr>
<td>- Workers’ Compensation Rate (as a percent of wages)</td>
<td>5.43%</td>
<td>5.43%</td>
<td></td>
</tr>
<tr>
<td>Weekly Supervision Cost</td>
<td>$1,061.36</td>
<td>$2,061.30</td>
<td></td>
</tr>
<tr>
<td>- Number of Direct Staff Supervised</td>
<td>10.0</td>
<td>11.0</td>
<td></td>
</tr>
<tr>
<td>Supervision Cost per Participant per Billable Hour</td>
<td>$1.52</td>
<td>$3.72</td>
<td></td>
</tr>
<tr>
<td>Cost per Hour, Before Program Operations &amp; Administration</td>
<td>$12.89</td>
<td>$20.44</td>
<td></td>
</tr>
<tr>
<td>- Daily Program Operations Costs</td>
<td>$20.00</td>
<td>$20.00</td>
<td></td>
</tr>
<tr>
<td>Program Operations Cost per Billable Hour</td>
<td>1.37</td>
<td>1.14</td>
<td></td>
</tr>
<tr>
<td>- Administrative Cost per Billable Hour (12%)</td>
<td>$1.94</td>
<td>$3.02</td>
<td></td>
</tr>
<tr>
<td>Rate per Billable Hour</td>
<td>$16.20</td>
<td>$25.20</td>
<td></td>
</tr>
</tbody>
</table>
SUPERVISION
COMMUNITY-BASED DAY PROGRAMS, CAREER FOCUSED VOLUNTEERISM/INTERNSHIP 1:3

SUPERVISORY RESOURCES REQUIRED

| 30 clients | need | 10 DSP'S |
| 30 clients | need | 1 PROGRAM MANAGER |
| 30 clients | need | 0.33 PROGRAM DIRECTOR |

<table>
<thead>
<tr>
<th>SUPERVISORY FUNCTION</th>
<th>BASE WAGE</th>
<th>ALLOCATION</th>
<th>RATE PER BILLABLE HOUR</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.33 PROGRAM DIRECTOR</td>
<td>$75,000</td>
<td></td>
<td>$11.90</td>
</tr>
<tr>
<td>1 PROGRAM MANAGER</td>
<td>$60,000</td>
<td></td>
<td>$28.85</td>
</tr>
<tr>
<td>CHIEF CLINICAL OFFICER (for 295 clients)</td>
<td></td>
<td>5%</td>
<td>$0.01</td>
</tr>
<tr>
<td>REGIONAL DIRECTOR</td>
<td></td>
<td>10%</td>
<td>$0.01</td>
</tr>
<tr>
<td>INTAKE COORDINATOR</td>
<td></td>
<td>10%</td>
<td>$0.01</td>
</tr>
<tr>
<td>VOLUNTEER/INTERNSHIP DEVELOPER</td>
<td></td>
<td>10%</td>
<td>$0.01</td>
</tr>
</tbody>
</table>

$40.79
A rate model does not exist for Careers in the Arts Services.

Multiple pathways to Careers in the Arts success include the blending of three roles:

1) An Exhibiting Artist with a strong studio practice of creating artwork, developing a portfolio and resume, exhibiting and selling art locally and internationally.
2) An Arts Educator as a paid professional, designing lesson-plans and leading classes and presentations.
3) A Professional in Art Management, including curation and exhibition design, and successfully developing and launching art businesses.

Art Centers provides experienced, professional artists who lead each person through individually designed sequential and measurable skill building practices in fully equipped studios. All materials and equipment for art curriculum and production are supplied. A consistency in mentorship and art instruction bring each person to develop his/her own unique creative practice and also to establish a role as a professional in the arts.

Artists are then represented by various Galleries for promotion and to receive commissions for the sales of their artwork, as well as linkage to art licensing and further international representation and sales.

Each artist develops his/her own state of the art portfolio of artworks, resume and professional presentation skills. The progressive studios of these Art Centers are dedicated to continually stretching forward to develop unique areas of self-employment options, as well as traditional jobs in the arts for each person. Progressive studios interlaces art instruction, professional mentorship, and facilitated studio practices to support an artist’s exploration and skill building toward his/her individual career goals. Artists are successful in their development of a regular studio practice and in expanding their use of media and content for artistic expression. Professional development coincides with enhanced personal awareness of self-driven accomplishment, earned income and increased experiences of being valued and included. Through professional mentorship and instruction, both individually and in small groups,
artists engage in 2D, 3D and 4D media studies including, but not limited to: drawing, painting, collage, graphic design, printmaking, ceramics, assemblage sculpture and animation and video production practices.

There are no limitations to the successes available for anyone who has an interest in exploring the arts as a career.

**Wages**

See attached wage assumptions for a direct staff for the CA services. The primary skill set of the CA DSP is to:

Art instructors are art educators who maintain their own professional studio practices and offer each person enrolled an “artist to artist” mentorship, while providing quality leadership and expertise in arts instruction. All Art Center’s staff demonstrate exceptional skills in providing sensitive and effective person-centered service and sequential instruction for each artist.

A Master’s degree in Fine Arts is preferred. A Bachelor’s degree is required.

The wage model shows that the base wage should be $22.47 per hour. SEE CA WAGE ASSUMPTIONS

---

**CAREERS IN THE ARTS DSP WAGE ASSUMPTIONS**

<table>
<thead>
<tr>
<th>DSP Area of Responsibility</th>
<th>SOC</th>
<th>SOC Code</th>
<th>wage</th>
<th>percent of time</th>
<th>weighted wage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Create original artwork using any of a wide variety of media and techniques. Master’s degree preferred. Bachelor’s Degree Required</td>
<td>Fine Artists, including painting, sculpting and illustrators</td>
<td>27-1015</td>
<td>40.24</td>
<td>0.15</td>
<td>6.036</td>
</tr>
<tr>
<td>Counsel individuals to maximize the independence and employability of persons coping with personal, social, and vocational difficulties that result from birth defects, illness, disease, accidents, aging, or the stress of daily life. Coordinate activities for residents of care and treatment facilities. Assess client needs and design and implement rehabilitation programs that may include personal and vocational counseling, training, and job placement. Includes “Occupational Therapists” (23-1122).</td>
<td>Rehabilitation Counselors</td>
<td>21-1015</td>
<td>17.2</td>
<td>0.3</td>
<td>5.16</td>
</tr>
<tr>
<td>Teach or instruct individuals or groups for the primary purpose of self-enrichment or recreation, rather than for an occupational objective, educational attainment, competition, or fitness. Includes “Coaches and Scouts” (27-2122) and “Exercise Trainers and Group Fitness Instructors” (39-9031). Flight instructors are included with “Aircraft Pilots and Flight Engineers” (53-1020).</td>
<td>Self-Enrichment Teachers</td>
<td>25-3021</td>
<td>23.29</td>
<td>0.3</td>
<td>9.697</td>
</tr>
<tr>
<td>Assist mentally impaired or emotionally disturbed patients, working under direction of nursing and medical staff. May assist with daily living activities, lead patients in educational and recreational activities, or accompany patients to and from examinations and treatments. May restrain violent patients. Includes psychiatric technicians.</td>
<td>Psychiatric Aides</td>
<td>31-1013</td>
<td>15.84</td>
<td>0.03</td>
<td>0.4692</td>
</tr>
<tr>
<td>Perform administrative and certain clinical duties under the direction of a physician. Administrative duties may include scheduling appointments, maintaining medical records, billing, and coding information for insurance purposes. Clinical duties may include taking and recording vital signs and medical histories, preparing patients for examination, drawing blood, and administering medications as directed by physician.</td>
<td>Medical Assistants</td>
<td>31-9092</td>
<td>17.31</td>
<td>0.05</td>
<td>0.8655</td>
</tr>
<tr>
<td>Provide personalized assistance to individuals with disabilities or illness who require help with personal care and activities of daily living support (e.g., feeding, bathing, dressing, grooming, toileting, and ambulation). May also provide help with tasks such as preparing meals, doing light housekeeping, and doing laundry. Work is performed in various settings depending on the needs of the care recipient and may include locations such as their home, place of work, in the community, or at a daytime nonresidential facility.</td>
<td>Personal Care and Service Occupations</td>
<td>39-0000</td>
<td>14.28</td>
<td>0.1</td>
<td>1.428</td>
</tr>
<tr>
<td>Under close supervision of a physical therapist or physical therapy assistant, perform only delegated, selected, or routine tasks in specific situations. These duties include preparing the patient and the treatment area.</td>
<td>Physical Therapist Aides</td>
<td>31-2222</td>
<td>15.44</td>
<td>0.05</td>
<td>0.772</td>
</tr>
<tr>
<td>Assess community employment environments (paid or volunteer) and other community venues and to develop task analyses, instructional services and supports unique to the consumer’s learning/information processing modalities.</td>
<td>Special education teachers, all other</td>
<td>25-2059</td>
<td>57.5</td>
<td>0.02</td>
<td>0.75</td>
</tr>
</tbody>
</table>

---

<p>| 1 | 22.4687 |</p>
<table>
<thead>
<tr>
<th>Benefits</th>
<th>Benefits are adjusted using page C-2 of the proposed rate models.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Productivity Factors</td>
<td>As commented in the general comments, it is not legal to have more than 30 billable hours in a day program. Adjustments were made to include 100 minutes of non billable and legally mandated rest breaks, and 254 hours of PTO per the earlier general comments. As discussed earlier, attendance rate of 90% is not realistic, especially with hourly billing. Attendance is better at the progressive studios than a typical day program so rate was lowered only to 80%.</td>
</tr>
<tr>
<td>Supervision and Program Operations</td>
<td>See earlier comments about a more appropriate BLS job category for the supervisor as 11-9151, Social / Community Service Manager with a median salary of $32.13 per hour.</td>
</tr>
</tbody>
</table>
| Supervision and Program Operations #2                                  | The Rate Model does not account for any additional infrastructure required to provide direct services. It appears that the entire service system will be delivered in pods of 1 supervisor to 10 staff without further program director or leadership. The Rate study should account for larger models of service by including a weighted average for supervision.  
For example,  
100% of a First Line Supervisor (included)  
25% of Program Director (not included)  
12.5% of a Regional Director (not included)  
.0125% of a Chief Operating Officer (not included)  
All of these positions or ones similarly (such as Support Plan Coordinators and Assistant Coordinators) are direct service positions responsible for the development and delivery of the ISP objectives, program outcomes including integration and employment in the community, quality assurance, intake/enrollment, customize Person-Centered Plans, and so forth.  
These are not administrative roles |
| Administration                                                           | See general comments. |
| Other                                                                   | There is no mileage as program is based at an Art Center. |
### CAREERS IN THE ARTS RATE MODEL

#### COMMUNITY-BASED DAY PROGRAMS, CENTER/FACILITY: 1:3

#### SERVICE CODE 094

<table>
<thead>
<tr>
<th>Unit of Service</th>
<th>Base Model</th>
<th>TDS/Inland</th>
</tr>
</thead>
<tbody>
<tr>
<td>Direct Staff Hourly Wage</td>
<td>$14.89</td>
<td>$43.38</td>
</tr>
<tr>
<td>Employee Benefit Rate (as a percent of wages)</td>
<td>26.40%</td>
<td>27.38%</td>
</tr>
<tr>
<td>Workers' Compensation Rate (as a percent of wages)</td>
<td>5.43%</td>
<td>5.43%</td>
</tr>
<tr>
<td>Hourly Staff Cost Before Productivity Adj. (wages + benefits)</td>
<td>$19.63</td>
<td>$57.61</td>
</tr>
</tbody>
</table>

#### Productivity Adjustments

| Total Hours | 40.00 | 40.00 |
| Program Set-Up/Clean Up | 1.11 | 1.11 |
| Recordkeeping and Reporting | 1.11 | 1.11 |
| Supervision and Other Employer Time | 0.86 | 0.86 |
| Training | 0.67 | 0.67 |
| Paid Time Off | 3.85 | 4.88 |
| "Billable" Hours | 32.37 | 31.34 |
| Productivity Factor | 1.24 | 1.28 |

#### Staffing Ratio

| Group Size (Participants per Direct Support Staff) | 3.00 | 3.00 |
| Participant Attendance Rate | 90.09% | 80.09% |
| Adjusted Weighted Ave. of No. of Participants per Staff | 2.70 | 2.40 |

#### Staff Cost After Productivity Adj. per Billable Hour

| 250.0 | 250.0 |
| 225.0 | 200.0 |
| 5.0 | 6.0 |
| 145.0 | 120.0 |

#### Amount per Mile

| Number of Miles Traveled per Vehicle per Week | 0.0 | 0.0 |
| Number of Participants per Vehicle | 0.0 | 0.0 |
| Allocated Miles per Participant per Week | $0.00 | $0.00 |
| Annual Mileage Cost/Participant (at 266 days of operation) | $0.00 | $0.00 |
| Mileage Cost per Participant per Billable Hour | $0.00 | $0.00 |

#### Square Feet of Service Space per Participant

| Annual Cost per Square Foot | $15.00 | $16.20 |
| Annual Facility Cost per Participant | $750.00 | $3,207.60 |
| Facility Cost per Participant per Billable Hour | $0.56 | $2.67 |

#### Supervisor Hourly Wage

| Supervisor Benefit Rate (as a percent of wages) | 20.92% | 21.62% |
| Workers' Compensation Rate (as a percent of wages) | 5.43% | 5.43% |
| Weekly Supervision Cost | $1,063.36 | $2,340.50 |
| Number of Direct Staff Supervised | 10.0 | 10.0 |
| Supervision Cost per Participant per Billable Hour | $1.52 | $4.23 |

#### Cost per Hour, Before Program Operations & Administration

| Administrative Cost per Billable Hour | $1.70 | $5.36 |
| Rate per Billable Hour | $14.17 | $44.63 |
## Direct Support Staff Wages

**Service Code 094**

<table>
<thead>
<tr>
<th>DIRECT SUPPORT STAFF</th>
<th>% OF DSP'S</th>
<th>NUMBER</th>
<th>BASE WAGE</th>
<th>RATE PER BILLABLE HOUR</th>
</tr>
</thead>
<tbody>
<tr>
<td>DSP: 1 - 3 yrs</td>
<td>50%</td>
<td>15</td>
<td>$21.75</td>
<td>$326.25</td>
</tr>
<tr>
<td>DSP: 4+ yrs</td>
<td>50%</td>
<td>15</td>
<td>$23.00</td>
<td>$345.00</td>
</tr>
<tr>
<td></td>
<td></td>
<td>30</td>
<td>$671.25</td>
<td>$22.38</td>
</tr>
<tr>
<td>0.5 Gallery Manager</td>
<td></td>
<td></td>
<td>$18.00</td>
<td></td>
</tr>
<tr>
<td>0.5 Client Coordinator (for 30 clients)</td>
<td></td>
<td></td>
<td>$24.00</td>
<td>$12.00</td>
</tr>
</tbody>
</table>

**Total Direct Staff Rate**

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>$43.38</td>
</tr>
</tbody>
</table>

## Supervision

**Service Code 094**

### Supervisory Resources Required

- 30 clients
- 30 clients

### Supervisory Function

<table>
<thead>
<tr>
<th>FUNCTION</th>
<th>BASE WAGE</th>
<th>ALLOCATION</th>
<th>RATE PER BILLABLE HOUR</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Program Director</td>
<td>$70,000</td>
<td>$33.65</td>
<td></td>
</tr>
<tr>
<td>0.3 Director - Tierra Del Sol Arts</td>
<td>$85,000</td>
<td>$12.26</td>
<td></td>
</tr>
<tr>
<td>Chief Clinical Officer (for 40 clients)</td>
<td>$85,000</td>
<td>10%</td>
<td>$0.14</td>
</tr>
</tbody>
</table>

**Total**

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>$46.05</td>
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</tbody>
</table>
## Overview

The purpose of this community-based program is to promote the self-help, self-advocacy, adaptive and communication skills of consumers who are presently unable to attend a day program outside of the home due to physical, medical, or other unique challenges, or who still desire an active, meaningful lifestyle, but require individualized support to successfully and safely participate in his/her preferred set of activities and routines. The goals of the service are to:

- develop necessary self-help skills through one-to-one coaching
- develop necessary communication skills through one-to-one coaching
- become proficient at using adaptations through one-to-one coaching
- learn to accept assistance and guidance
- participate in meaningful, personally rewarding activities within their local communities (e.g. volunteerism, community participation, etc.)
- become a more active, or more independent family participant, and/or
- transition into a community-based day services

Individual support also includes vehicular (and sometimes public) transportation in order to take full advantage of community based one-to-one coaching in environments and services that are described in this program design.

All consumers participating in this program will enhance their communication and self-advocacy skills. All consumers participating in this program will assume a greater degree of self-care and self-determination within their current environments.

## Wages

See attached wage assumptions for a DSP.  

**A Bachelor’s degree is preferred.**

The wage model shows that the base wage should be $19.94 per hour.
<table>
<thead>
<tr>
<th>Benefits</th>
<th>Benefits are adjusted using page C-2 of the proposed rate models.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Productivity Factors</td>
<td>As commented in the general comments, it is not legal to have more than 30 billable hours in a day program. Adjustments were made to include 100 minutes of non billable and legally mandated rest breaks, and 254 hours of PTO per the earlier general comments. As discussed earlier, attendance rate of 90% is not realistic, especially with hourly billing. Attendance is better at PCSS than a typical day program so rate was lowered only to 80%.</td>
</tr>
<tr>
<td>Supervision and Program Operations</td>
<td>See earlier comments about a more appropriate BLS job category for the supervisor as 11-9151, Social / Community Service Manager with a median salary of $32.13 per hour.</td>
</tr>
<tr>
<td>Supervision and Program Operations #2</td>
<td>The Rate Model does not account for any additional infrastructure required to provide direct services. It appears that the entire service system will be delivered in pods of 1 supervisor to 10 staff without further program director or leadership. The Rate study should account for larger models of service by including a weighted average for supervision. For example, 100% of a First Line Supervisor (included) 25% of Program Director (not included) 12.5% of a Regional Director (not included) .0125% of a Chief Operating Officer (not included) All of these positions or ones similarly (such as Support Plan Coordinators and Assistant Coordinators) are direct service positions responsible for the development and delivery of the ISP objectives, program outcomes including integration and employment in the community, quality assurance, intake/enrollment, customize Person-Centered Plans, and so forth. These are not administrative roles</td>
</tr>
<tr>
<td>Administration</td>
<td>See general comments.</td>
</tr>
<tr>
<td>Other</td>
<td></td>
</tr>
</tbody>
</table>
### PERSONALIZED COMMUNITY SUPPORT SERVICES, COMMUNITY 1:1 RATE MODEL

**SERVICE CODE: 055**

#### 1:1 PROGRAM

<table>
<thead>
<tr>
<th>Unit of Service</th>
<th>North LA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Direct Staff Hourly Wage</td>
<td>$19.94</td>
</tr>
<tr>
<td>Employee Benefit Rate (as a percent of wages)</td>
<td>26.40%</td>
</tr>
<tr>
<td>Workers’ Compensation Rate (as a percent of wages)</td>
<td>5.42%</td>
</tr>
<tr>
<td>Hourly Staff Cost Before Productivity Adj. (wages + benefits)</td>
<td>$26.28</td>
</tr>
</tbody>
</table>

#### Productivity Adjustments

| Total Hours                                           | 40.00    |
| Program Set-Up/Clean Up                               | 1.13     |
| Recordkeeping and Reporting                           | 0.89     |
| Supervision and Other Employer Time                   | 0.89     |
| Training                                              | 0.67     |
| Paid Time Off                                         | 4.88     |

**"Billable" Hours**

| Productivity Factor                                  | 1.27     |

#### Staffing Ratio

| Group Size (Participants per Direct Support Staff)   | 1.00     |
| Participant Attendance Rate                          | 85.0%    |
| Adjusted Weighted Ave. of No. of Participants per Staff | 0.85    |

#### Staff Cost After Productivity Adj. per Billable Hour

| Annual Days of Program Operation                     | 250.0    |
| Annual Days of Participant Attendance                | 212.5    |
| Hours per Day of Participant Attendance              | 6.0      |
| Hours per Year of Participant Attendance             | 1.275    |

| Amount per Mile                                      | $0.560   |
| Number of Miles Traveled per Vehicle per Week        | 250      |
| Number of Participants per Vehicle                   | 0.9      |
| Allocated Miles per Participant per Week             | 277.8    |

| Annual Mileage Cost/Participant (at 246 days of operation) | $6,847.22 |
| Mileage Cost per Participant per Billable Hour        | $5.37    |

| Square Feet of Service Space per Participant         | 50.0     |
| Annual Cost per Square Foot                          | $17.25   |
| Annual Facility Cost per Participant                 | $862.50  |

### Facility Cost per Participant per Billable Hour

| Supervisors Hourly Wage                              | $23.75   |
| Supervisors Benefit Rate (as a percent of wages)     | 20.92%   |
| Workers’ Compensation Rate (as a percent of wages)  | 5.43%    |

| Weekly Supervision Cost                              | $1,200.32|
| Number of Direct Staff Supervised                    | 10.0     |

| Supervision Cost per Participant per Billable Hour   | $5.76    |

| Cost per Hour, Before Program Operations & Administration | $51.00 |
| Daily Program Operations Costs                        | $20.00  |

### Program Operations Cost per Billable Hour

| $4.61                                                |
| Administrative Cost per Billable Hour (12%)          | $7.58    |

| Rate per Billable Hour                               | $68.20   |
SUPERVISION
PERSONALIZED COMMUNITY SUPPORT SERVICES, COMMUNITY 1:1

SUPERVISORY RESOURCES REQUIRED

<table>
<thead>
<tr>
<th>10 clients</th>
<th>need</th>
<th>10 DSP's</th>
<th>0.5 PROGRAM MANAGER</th>
<th>0.25 PROGRAM DIRECTOR</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>SUPERVISORY FUNCTION</th>
<th>BASE WAGE</th>
<th>ALLOCATION</th>
<th>RATE PER BILLABLE HOUR</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.25 PROGRAM DIRECTOR</td>
<td>$75,000</td>
<td></td>
<td>$9.01</td>
</tr>
<tr>
<td>0.5 PROGRAM MANAGER</td>
<td>$60,000</td>
<td></td>
<td>$14.42</td>
</tr>
<tr>
<td>CHIEF CLINICAL OFFICER (for 68 clients)</td>
<td>10%</td>
<td></td>
<td>$0.08</td>
</tr>
<tr>
<td>REGIONAL DIRECTOR</td>
<td>25%</td>
<td></td>
<td>$0.16</td>
</tr>
<tr>
<td>INTAKE COORDINATOR</td>
<td>10%</td>
<td></td>
<td>$0.04</td>
</tr>
<tr>
<td>VOLUNTEER/INTERNSHIP DEVELOPER</td>
<td>10%</td>
<td></td>
<td>$0.03</td>
</tr>
</tbody>
</table>

$23.75
## DDS Rate Study Public Comment – Specific Service Code

<table>
<thead>
<tr>
<th>Name</th>
<th>LA Coalition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Service Name</td>
<td>Specialized Therapeutic Services/117</td>
</tr>
</tbody>
</table>

### Comment Topic

| Wages | Although layering service codes has been proposed for the clinical oversight, there is no base day service model that can currently support the staffing levels required by the direct care staff. Direct staff at this level of care are Licensed Vocational Nurses, Licensed Psychiatric Technicians or Psychiatric nurses. Clients exhibit crisis behaviors multiple times per day and need clinical intervention. Expertise based on staffing at developmental centers and state hospitals where clients are coming from. When 2:1 (staff to client) ratio is needed second staff is an RBT. Same for 3:1 (staff to client) ratio. One staff in ratio must be licensed due to high prevalence of behaviors, medical needs, mental health needs, and psychiatric medications. **Serving individuals with RBT or DSP level staffing in the past has resulted in massive injuries to staff, clients, and community members.** Recommendation is for the wage basis to be at 75% percentile since staff are working in intense and dangerous situations.

Moreover concerning clinical client support:

BCBAs are working with a caseload of 4 individuals providing approximately 6-8 hours of support per person per week. This includes crisis assistance (for 3 person crisis immobilization procedures), plan development and implementation, coordination of services in the community, and ongoing treatment). Each billable hour requires intensive documentation and planning.

LMFTs are providing mental health therapy with a caseload of 6 clients serving each individual with 4-6 hours of services per week. Each hour requires intensive documentation and debrief with Clinical supervisor. Again, due to intensive work environment, the rate assumption should be adjusted to 75% percentile. |
<table>
<thead>
<tr>
<th>Benefits</th>
<th>See comments in DSP wage.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Productivity Factors</td>
<td>See rate model below.</td>
</tr>
</tbody>
</table>
| **Supervision and Program Operations**      | Program requires intensive supervision by a Licensed, Certified, or Clinical Professional to oversee all direct services by LPTs, LVNs, and other BCBAs. Due to the intensive nature of programming, adherence to plan and multidisciplinary planning is of utmost importance.  

LMFTs supervised by Clinical Psychologist for ongoing treatment design, debriefing, training, and coordination of mental health plans. 

RN supervises all medical aspects of the program for LPTs and LVNs. |
| **Supervision and Program Operations #2**    | The Rate Model does not account for any additional infrastructure required to provide direct services. It appears that the entire service system will be delivered in pods of 1 supervisor to 10 staff without further program director or leadership. The Rate study should account for larger models of service by including a weighted average for supervision.  

For example,  
100% of a First Line Supervisor (included)  
25% of Program Director (not included)  
12.5% of a Regional Director  
.0125% of a Chief Operating Officer  

All of these positions or ones similarly are direct service positions responsible for the development and delivery of the ISP objectives, program outcomes including integration and employment in the community, quality assurance, intake/enrollment, customize Person-Centered Plans, and so forth.  

These are not administrative roles. |
<p>| Administration                               | See General Comments.     |
|                                              | Additionally, mileage: See adjustment to mileage factor in 117 proposed rate model, due to increased vehicular property damage. Clients tend to punch out windows and mirrors on a regular basis. Due to medical and behavioral challenges, there are frequent cleaning needs as well (urination/fecal smearing/blood). |</p>
<table>
<thead>
<tr>
<th>Other</th>
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</thead>
<tbody>
<tr>
<td>The elimination of this service code without suitable replacement will leave individuals who need a more specialized and intensive program without services. It will not suffice to just use individual clinician codes, as there will not be a place to house the service or any glue for program oversight.</td>
</tr>
<tr>
<td>The proposed use of individual clinician codes, and therefore Medi-Cal rates plus 39.7%, will not suffice as it will still be elusive to attract clinicians at these rates. These rates can barely sustain a single professional hour and do not have productivity, program support, benefits, workers compensation benefits, and administration attached to them. Never the less time for multidisciplinary meetings and documentation that exceeds typical reporting. Individuals using this service code would have to remain at home, enter SNFs, or return to institutional settings without this code. This service helps support HCBS compliance in other programs as the professional team helps eliminate barriers to inclusion to some of the most complex persons served in our system.</td>
</tr>
<tr>
<td>Unit of Service</td>
</tr>
<tr>
<td>----------------</td>
</tr>
<tr>
<td><strong>Direct Support Staff Wages and Benefits</strong></td>
</tr>
<tr>
<td>Direct Staff Hourly Wage (Licensed Psychiatric Technician or Psychiatric LVN)</td>
</tr>
<tr>
<td>Employee Benefit Rate (as percentage of wages)</td>
</tr>
<tr>
<td>Workers’ Compensation Rate (as percentage of wages)</td>
</tr>
<tr>
<td>Hourly Staff cost Before Productivity Adj. (wages+benefits)</td>
</tr>
<tr>
<td>Productivity Adjustments</td>
</tr>
<tr>
<td>Total Hours</td>
</tr>
<tr>
<td>Travel Time Between Individuals</td>
</tr>
<tr>
<td>Recordkeeping and Reporting</td>
</tr>
<tr>
<td>Supervision and other Employer time</td>
</tr>
<tr>
<td>Collateral contacts (not billable)</td>
</tr>
<tr>
<td>Training</td>
</tr>
<tr>
<td>Paid Time Off</td>
</tr>
<tr>
<td>Billable Hours</td>
</tr>
<tr>
<td>Productivity Factor</td>
</tr>
<tr>
<td><strong>Staff Cost After Productivity Adj. per Billable Hour</strong></td>
</tr>
<tr>
<td><strong>Mental Health Staff (LMFT) wages and Benefits</strong></td>
</tr>
<tr>
<td>Direct Staff Hourly Wage (LMFT)</td>
</tr>
<tr>
<td>Employee Benefit Rate (as percentage of wages)</td>
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<tr>
<td>Workers’ Compensation Rate (as percentage of wages)</td>
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<tr>
<td>Travel Time Between Individuals</td>
</tr>
<tr>
<td>Category</td>
</tr>
<tr>
<td>-----------------------------------------</td>
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<tr>
<td>Paid Time Off</td>
</tr>
<tr>
<td>Billable Hours</td>
</tr>
<tr>
<td>Productivity Factor</td>
</tr>
<tr>
<td>Number of Individuals served</td>
</tr>
<tr>
<td><strong>Staff Cost After Productivity Adj. per Billable Hour</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Mileage</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Amount per Mile</td>
<td>$ 0.58</td>
</tr>
<tr>
<td>Number of miles Traveled per week</td>
<td>250</td>
</tr>
<tr>
<td>Amount per mile</td>
<td>1.6</td>
</tr>
<tr>
<td>Weekly mileage cost</td>
<td>156.3</td>
</tr>
<tr>
<td><strong>Mileage per billable hour</strong></td>
<td><strong>$ 3.02</strong></td>
</tr>
</tbody>
</table>

| Supervision (BCBA)                     |         |
| Supervisor Hourly Wage (BCBA Clinical Director - oversees all direct services) | $ 53.22 |
| Supervisor Benefit Rate (as a percentage of wages) | 12.90%  |
| Workers' compensation rate (as a percentage of wages) | 5.43%   |
| Weekly Supervision Cost                | $ 2,519.01 |
| Number of Direct Staff supervised      | 10      |
| **BCBA Supervision Cost per Billable Hour** | **$ 6.82** |

<p>| Supervision (Clinical Psychologist)    |         |
| Supervisor Hourly Wage (Psychologist Clinical Director - oversees all LMFTs) | $ 53.22 |
| Supervisor Benefit Rate (as a percentage of wages) | 12.90%  |
| Workers' compensation rate (as a percentage of wages) | 5.43%   |</p>
<table>
<thead>
<tr>
<th>Supervision (RN)</th>
<th>Supervisor Hourly Wage (RN- oversees all LVNs/LPTs medical tasks)</th>
<th>$53.22</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Supervisor Benefit Rate (as a percentage of wages)</td>
<td>12.90%</td>
</tr>
<tr>
<td></td>
<td>Workers' compensation rate (as a percentage of wages)</td>
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<tr>
<td></td>
<td>Weekly Supervision Cost</td>
<td>$2,519.01</td>
</tr>
<tr>
<td></td>
<td>Number of Direct Staff supervised</td>
<td>10</td>
</tr>
<tr>
<td></td>
<td><strong>RN Supervision Cost per Billable Hour</strong></td>
<td>$6.82</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Admin. and Prog. Operations</th>
<th>Cost per Hour Before Program Operations and Administration</th>
<th>$105.67</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Daily Program Operations Costs</td>
<td>$20.00</td>
</tr>
<tr>
<td></td>
<td><strong>Program Operations costs per billable hour</strong></td>
<td>$3.33</td>
</tr>
<tr>
<td></td>
<td>Administration Percent</td>
<td>12%</td>
</tr>
<tr>
<td></td>
<td><strong>Administration Cost per Billable Hour</strong></td>
<td>$13.08</td>
</tr>
<tr>
<td></td>
<td>Rate per Billable Hour</td>
<td>$122.08</td>
</tr>
</tbody>
</table>