

American Rescue Plan Act (ARPA) Staff Training, Credentialing and Business Associates Programs for Employment

April 4, 2022 Webinar Questions and Answers (Q&A)

I. Invoicing

1. Q: What documentation does the Office of Developmental Programs (ODP) require for invoicing?

A: Paid invoices and/or accounting records of costs.

2. Q: Can the supplemental payment be approved before agencies pay for different items improving training?

A: No, the agency must make payment for the training based on the approved application, submit a paid invoice, and then receive payment. To assist with cash flow, providers may also request up to two progress payments in addition to a completion payment. Supporting documentation would also be required for any progress payment.

3. Q: Could we submit an anticipated expense sheet for funding approval?

A: Anticipated expense sheets can be submitted as part of the agency's application; agencies will only receive payment after submitting a paid invoice and/or accounting records of cost.

4. Q: If an agency submits 2 applications, does the funding limit apply to each separately, or both combined?

A: An agency can apply for both categories and funding would be limited for both proposals (combined) using the following methodology:

- **Funding may be requested up to 1% of ODP eligible service revenue from FY19/20, FY20/21 or \$100,000, whichever is greatest.**

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5. Q: Can you define "two progress payments in addition to a completion payment?"

A: Agencies need to provide documentation of expenditures prior to ODP releasing funds; a progress payment allows agencies to receive partial payment for a ARPA plan to assist with cash flow.

6. Q: In the announcement where it says, "One-Time Supplemental funding must be utilized prior to October 31, 2023", what does that entail? Does it mean that we can gather future training invoices/training for proof of expenses up to October 31 of next year so that it can be added to the total One-Time Supplemental funding payment for this year?

A: The requirement is that funds are expended by October 31, 2023, and there is documentation to substantiate that the funds were expended.

II. Credentialing

1. Q: Would the National Association of Direct Support Professionals (NADSP) Credentialing be acceptable under this proposal?

A: Yes.

2. Q: Are there recommended credentialing programs?

A: ODP listed several credentialing programs in the announcement including DSP National Association for Dual Diagnosis certifications or Agency completion of National Association for Dual Diagnosis Accreditation; LifeCourse Ambassador series for individuals or agency hosting of the series; additionally, the National Alliance for DSPs E-Badge Academy and The Council on Quality and Leadership (CQL). Other credentialing and certification programs will be considered as part of an agency's proposal.

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3. Q: Is there a recommended curriculum for credentialing Direct Support Professionals (DSP) I, II, III. If where? Which?

A: The NADSPs E-Badge Academy program includes credentialing for DSP I, II, and III.

4. Q: Would these funds cover the training costs as well as the employee's hourly wage while they are completing the training?

A: Yes, costs can include training and employee's time while receiving the training.

5. Q: How can providers institute this credentialing process if many of their staff also work with consumers through other funders such as the Office of Vocational Rehabilitation (OVR)?

A: The certifications and credentialing are above and beyond training requirements for ODP or OVR. Bonuses or incentive payments for completion are also acceptable.

6. Q: Would this only be open to those who are certified for providing vocational services or all providers?

A: The payments are available to all providers (excluding Supports Coordination) enrolled with ODP as of March 1, 2022.

7. Q: Could we make our own certification, or does it need to be from a certified organization?

A: Given the availability of nationally recognized certifications and credentialing, ODP would not advise this course of action; however, ODP will accept and review all applications for the supplemental funding. Providers seeking to develop certification and credentialing as part of their proposal should describe the plan for sustainability and routine updates to the content and delivery of the curriculum.

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III. Eligibility

1. Q: Funding may be requested up to 1% of ODP Eligible Services from Fiscal Years 19/20, 20/21. Which services?

A: All paid claims for any/all waiver services.

2. Q: Would a DSP completing the Association of Community Rehabilitation Educators (ACRE) be considered supplemental given that they are not required to complete it at this point?

A: ACRE training is not eligible for this initiative.

3. Q: Why isn't ACRE Training included?

A: ACRE is currently a provider qualification requirement. This funding is to support training that supplements or enhances existing training and is beyond the minimum training standards outlined in 55 Pa Code 6100 and the provider qualifications in the Home and Community Based Waivers (HCBS) waivers.

4. Q: Can these funds be used to pay ahead for qualification courses such as ACRE?

A: No, ACRE training is a provider qualification requirement. This funding is to support training that supplements or enhances existing training and is beyond the minimum training standards outlined in 55 Pa Code 6100 and the provider qualifications in the HCBS waivers.

5. Q: Can you use the funds to purchase a training system such as Relias to keep your DSP's training up to date?

A: Yes, providers are encouraged to develop a plan using the application form that supports the growth and retention of DSPs.

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6. Q: Can these funds be used to help the workforce obtain an associates or bachelor's degree?

A: Proposals that include post-secondary degrees will be considered on a case-by-case basis. Providers will demonstrate how the plan increases staff competency, creates a career ladder, and will be sustained when this initiative ends.

7. Q: If staff are employed as independent contractors, would the agency be eligible for the funding?

A: Yes. This information would be included in the agency's proposal.

8. Q: Can this be used for a Certified Nursing Assistant (CNA) certification?

A: Yes. *Note: A CNA must be supervised by a registered nurse or licensed practical nurse.*

9. Q: Can these funds be used for software for the employers to track staff training?

A: Yes.

10. Q: Can funds be used for future annual recertifications?

A: Yes, if the funds are spent by October 31, 2023.

11. Q: Can funding be used towards credential milestone raises? or bonuses?

A: No, this funding is not to be used for any wage/salary increases.

12. Q: Can the supplement payment be used for employee wage cost associated with start-up of a credentialing program? For example, HR personnel to implement.

A: Providers seeking to develop certification and credentialing as part of their proposal should describe the plan for sustainability and routine updates to the content and delivery of the curriculum.

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13. Q: Can the supplement payment be used for DSP wages spent on training associated with the credentialing program?

A: Yes, funding can be used to offset the cost of DSP wages while participating in a credentialing program.

IV. Application Process

1. Q: I recall the application for this being sent out several months ago. Our agency submitted the application at that time, I believe in December. Is this a different ARPA application? Or the same thing?

A: Yes, this is a different initiative from the One-Time Supplemental Payment to Address Recruitment, Retention, and COVID-19 Related Staff Expenses announced in December 2021. This ARPA initiative is aimed at supporting providers who wish to implement a standards-based training and credentialing program for Direct Support Professionals or who wish to implement a Business Associates in Industry program. This funding to support training that supplements or enhances existing training and is beyond the minimum training standards outlined in 55 Pa Code 6100 and the provider qualifications in the HCBS waivers.

2. Q: Can new providers who started providing support this year also apply for this funding?

A: To qualify for funding, providers must be enrolled with ODP as of March 1, 2022.

3. Q: If the proposal is not approved, can it be resubmitted with corrections?

A: Yes.

4. Q: Could an agency submit more than one proposal?

A: Yes, providers can submit one application for a training/credentialing plan and one application for a Business Associate in Industry.

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5. Q: If we do not hear back by the end of June, does that mean we were not selected?

A: Providers will be contacted about the status of their submitted applications.

6. Q: Can we submit for lost billable units due to increased training as part of the program we are considering implementing?

A: No

7. Q: Where can I find the application?

A: It is located on MyODP at the following link: <https://palms-awss3-repository.s3.us-west-2.amazonaws.com/Communications/ODP/2020/ODP+22-031.zip>

V. Additional Questions

1. Q: Are there plans to continue training reimbursement beyond 2023?

A: No, funding is limited to any cost incurred by October 31, 2023.

2. Q: Is the training to be received by a State Institution?

A: No.

3. Q: Will these funds be considered federal funding subject to Single Audit?

A: Yes.

4. Q: Business associate in industry- is that a discrete service in the ODP services?

A: No. A business associate in industry is an embedded staff person within a typical community business to assist with hiring practices and supporting people with disabilities in the workplace. The associate is typically an employment specialist on provider agency payroll and works on-site at that community business.

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5. Q: Can you have more than one business associate?

A: Yes.