



KENTUCKY CABINET FOR
HEALTH AND FAMILY SERVICES

Rate Study Work Group Meeting
June 27, 2022

Agenda

1. Recap Key Tasks and Timeframes
2. Inflation
3. Wage Analysis
4. Employee-Related Expenses (ERE) Analysis
5. Next Steps

Key Tasks and Estimated Timeline

Pre-Planning

- Conduct background research
- Develop survey approach
- Determination of services included in rate study
- Updating Appendix K for additional short-term provider relief

April - June

- Issue provider cost and wage survey
- Analyze and present provider survey results

September - November

- Obtain DMS and legislative approval on rates
- Finalize rate documentation
- Public comment process

March

- Plan and implement stakeholder engagement activities
- Review draft provider cost and wage survey with workgroup
- Finalize provider cost and wage survey

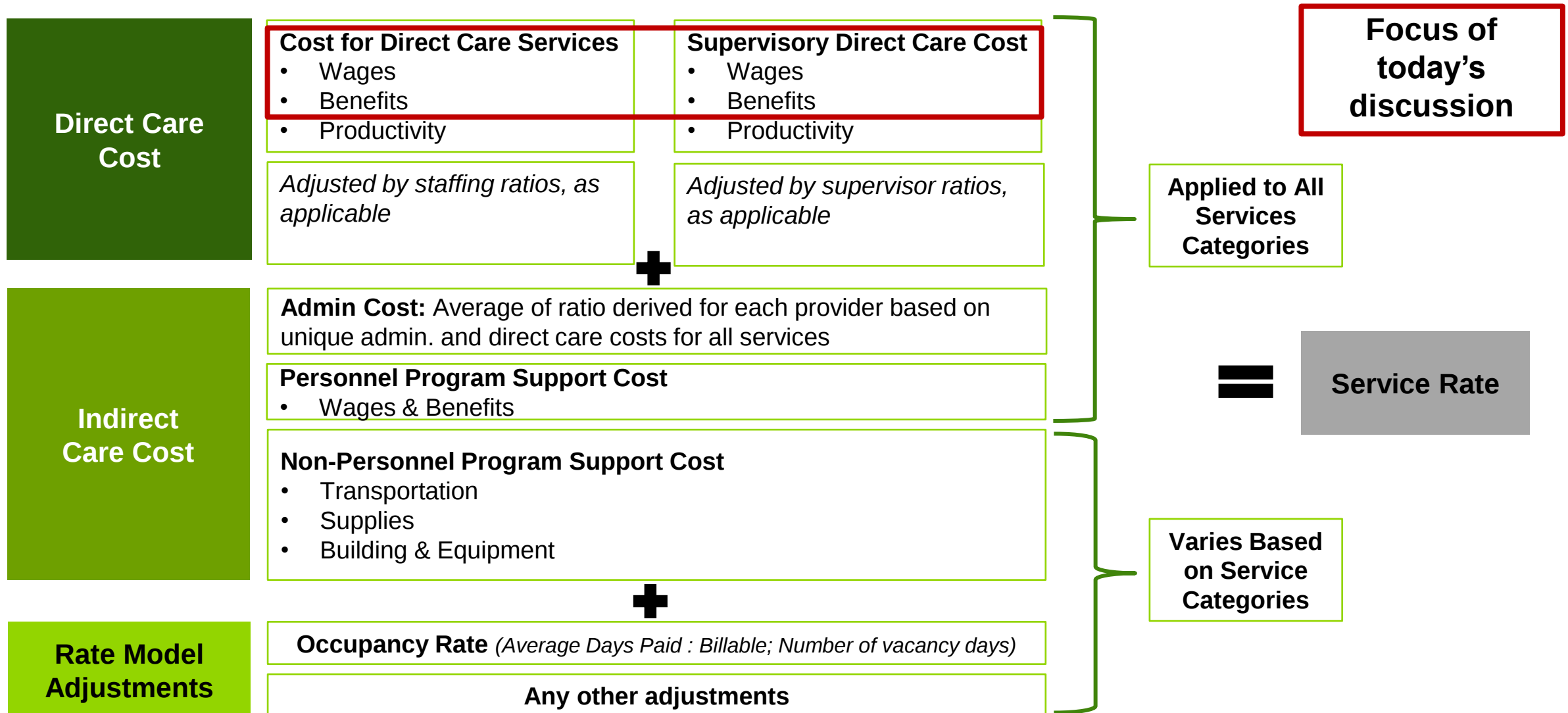
July - August

- Rate development process
- DMS approval of draft rates

December

- Submit waiver amendment to CMS (begin CMS 90-day review period)

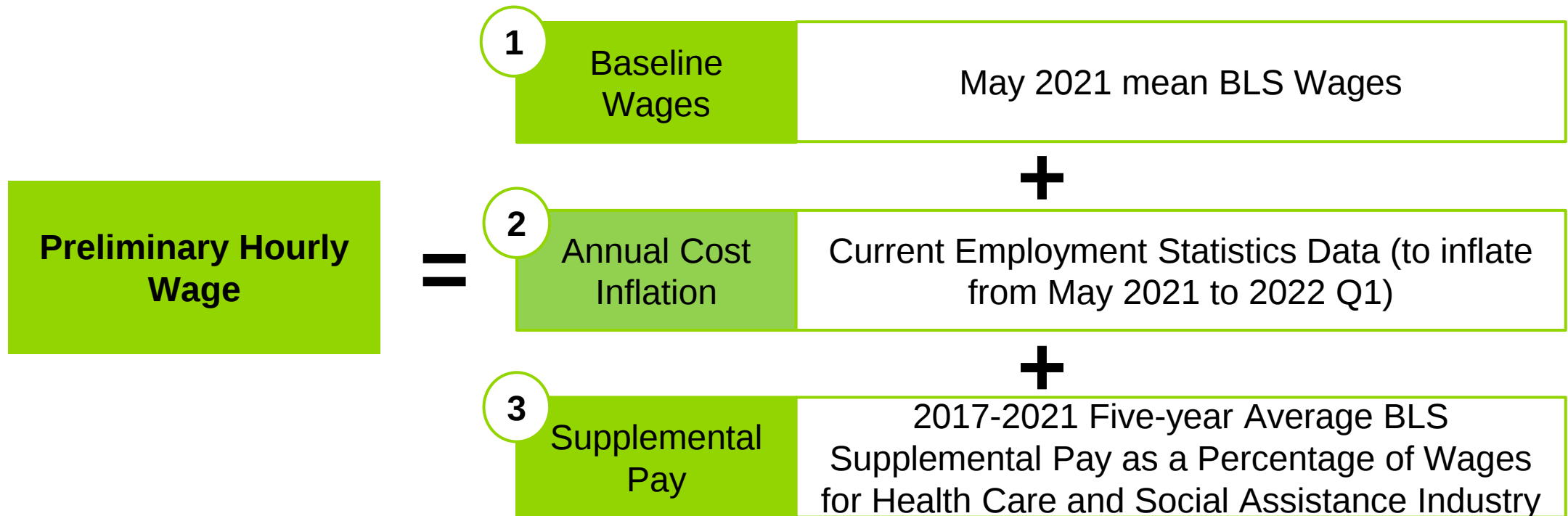
Overview of Rate Build-Up Approach



MODEL COMPONENTS: INFLATION

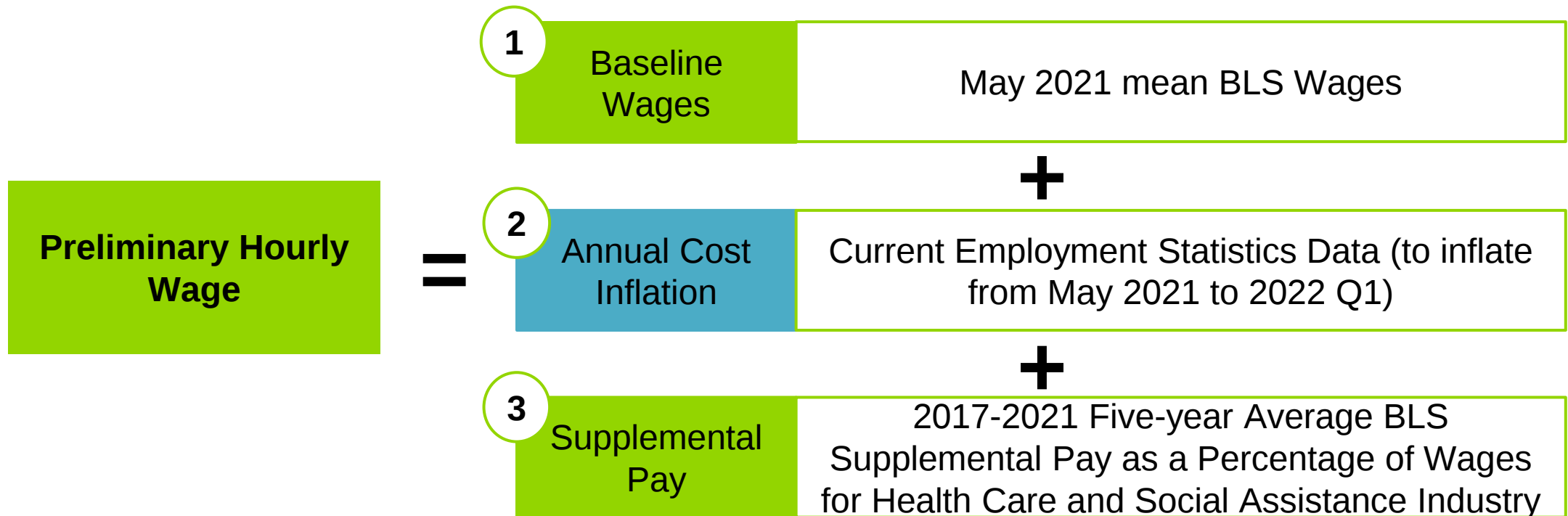
Wage Adjustment

Wages are computed by inflating the baseline average hourly wages to reflect growth in costs as well as supplemental pay as a function of wage and labor costs.



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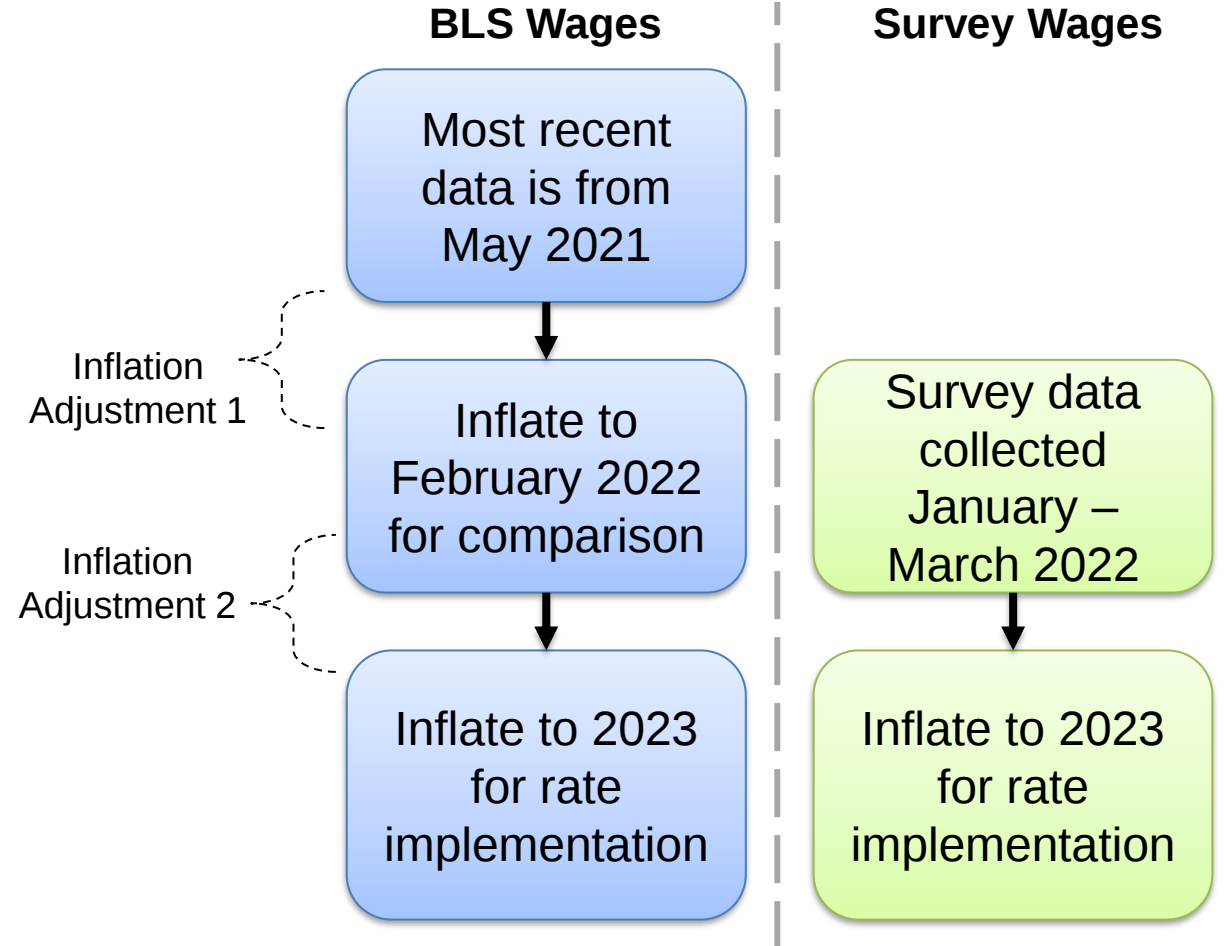
Inflation Overview

Hourly wages for direct care workers and supervisors serve as the baseline for the rate model build-up. DMS is considering wage data from both the provider cost and wage survey and the Bureau of Labor Statistics (BLS). Both data sources need to be adjusted for inflation.

There are several data sources which give insight into inflation. DMS considered the following three data sources, described further on the following slides:

- Consumer Price Index
- Producer Price Index
- Current Employment Statistics

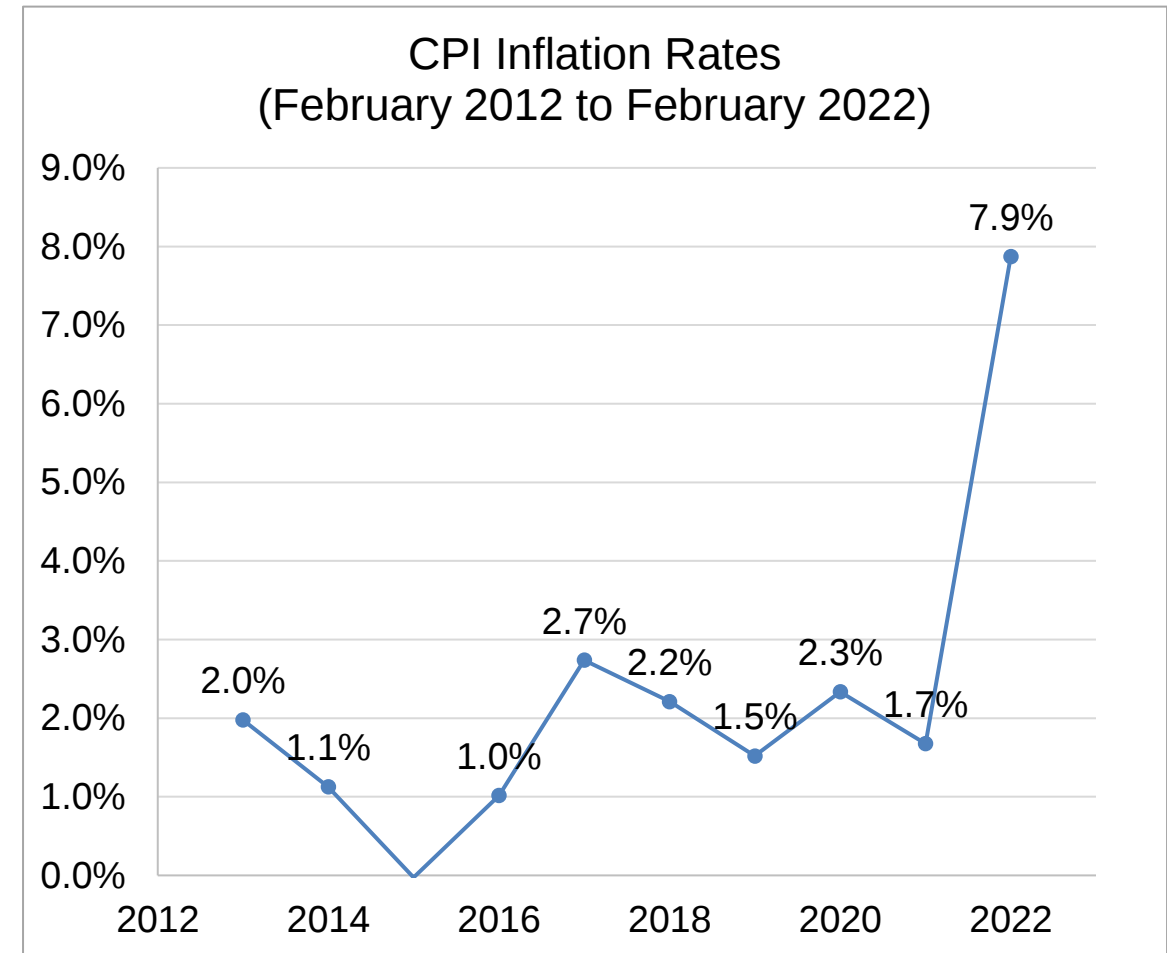
Tentative Inflation Methodology



*Rate implementation dates are dependent upon CMS review and approval of updated waiver applications.

BLS Consumer Price Index (CPI)

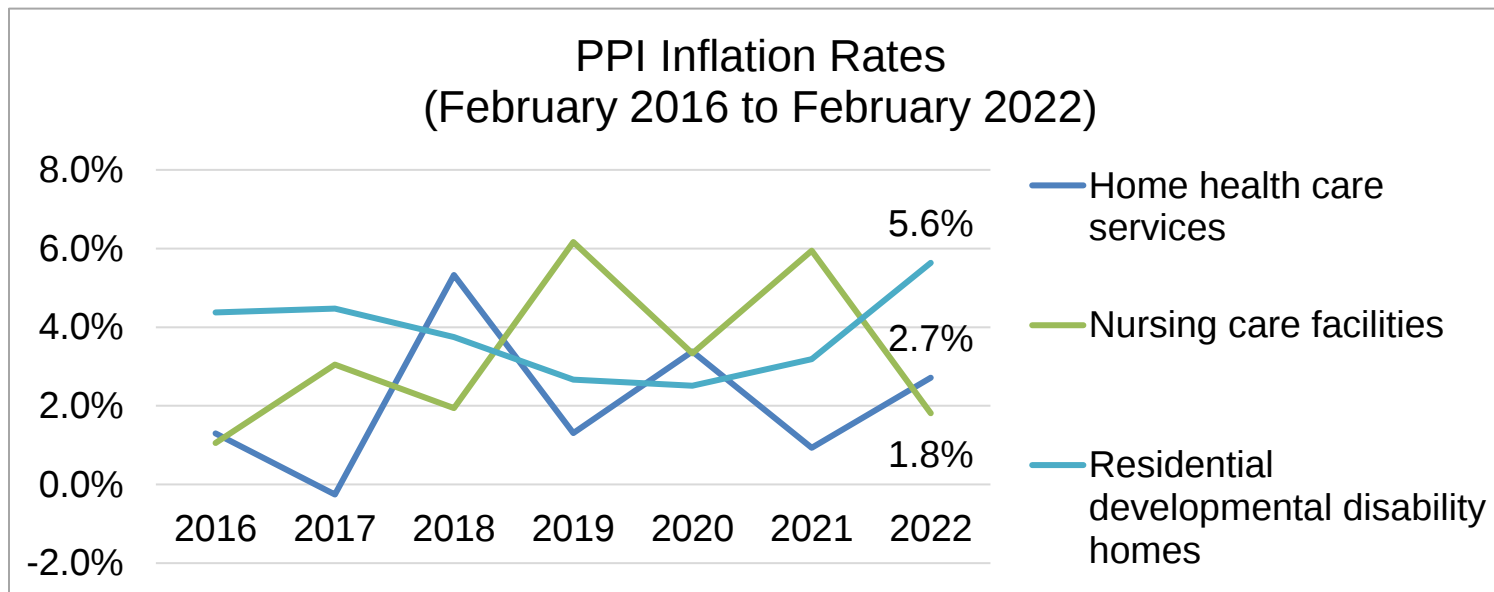
- The Consumer Price Index (CPI) is a measure of the **average change over time in the prices paid by urban consumers for a market basket of consumer goods and services**. Indexes are available for the U.S. and various geographic areas.
- CPI is the most widely used measure of inflation. For example, the Federal government uses CPI for annual cost-of-living adjustments.



Source: The Bureau for Labor Statistics (BLS), Consumer Price Index. <https://www.bls.gov/cpi/>

BLS Producer Price Index (PPI)

- The Producer Price Index (PPI) measures the average change over time in the selling prices received by domestic producers for their output (i.e., annual **inflationary increases in provider costs**).
- PPI is a Federal index of inflation across multiple industries in health care for Medicaid populations and services. The PPI has collected data on changes in Medicaid providers' costs on a monthly basis and measured it with a unique inflation index since 2014.



Categories:

- Home health care services
- Nursing care facilities
- Residential developmental disability homes

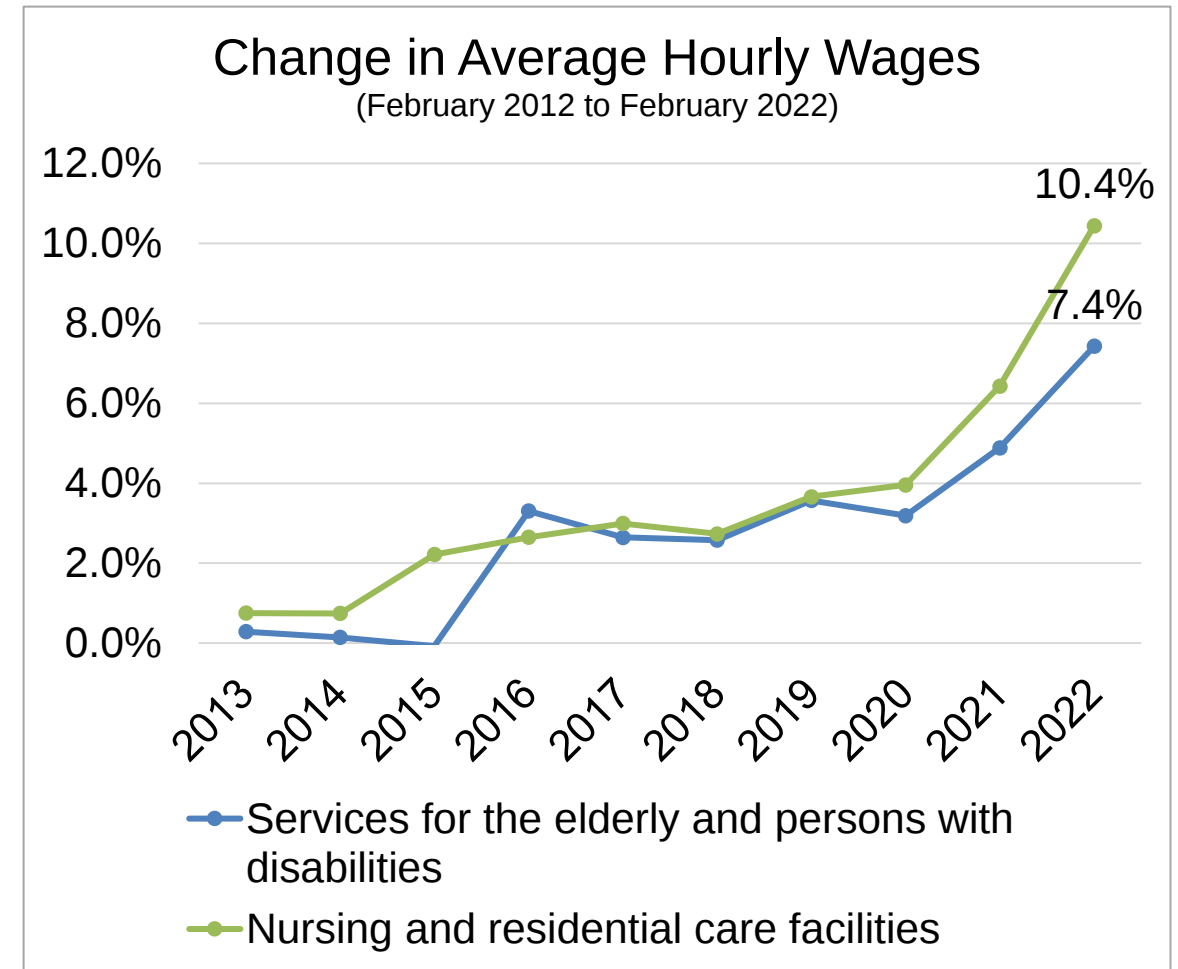
Source: The Bureau for Labor Statistics (BLS), Producer Price Index. <https://www.bls.gov/ppi/>

BLS Current Employment Statistics (CES)

- The National Current Employment Statistics (CES) provides **employment, hours, and earnings estimates** based on payroll records.
- The database includes multiple industries which align with HCBS. The table illustrates changes in average hourly wages over time across select categories.

Categories:

- Services for the elderly and persons with disabilities
- Nursing and residential care facilities



Source: The Bureau for Labor Statistics (BLS), Current Employment Statistics. <https://www.bls.gov/ces/>

Inflation Sources Comparison

	Consumer Price Index	Producer Price Index	Current Employment Statistics
Advantages	Most widely used inflationary measure	- Most representative of the target population – includes Medicaid-specific data and services similar to HCBS - Reflects the costs of providing services	- Focuses on employment and wages - Includes services similar to HCBS
Disadvantages	- Data represents broad US population, not specific to the rate study's target populations or services - Reflects the costs to the consumer of buying goods	Index of costs as a whole, not specific to wage growth only	Data includes overtime and supplemental pay, which may over-estimate base wage changes

**Average Inflation
(Across selected
categories; May
2021 to Feb 2022)**

5.39%

3.35%

7.76%

Inflation numbers included on this slide are not final.

Inflation Sources Comparison

	Consumer Price Index	Producer Price Index	Current Employment Statistics
Advantages	Most widely used inflationary measure	- Most representative of the target population – includes Medicaid-specific data and services similar to HCBS - Reflects the costs of providing services	- Focuses on employment and wages - Includes services similar to HCBS
Disadvantages	- Data represents broad US population, not specific to the rate study's target populations or services - Reflects the costs to the consumer of buying goods	Index of costs as a whole, not specific to wage growth only	Data includes overtime and supplemental pay, which may over-estimate base wage changes
Average Inflation (Across selected categories; May 2021 to Feb 2022)	5.39%	3.35%	7.76%

Inflation numbers included on this slide are not final.

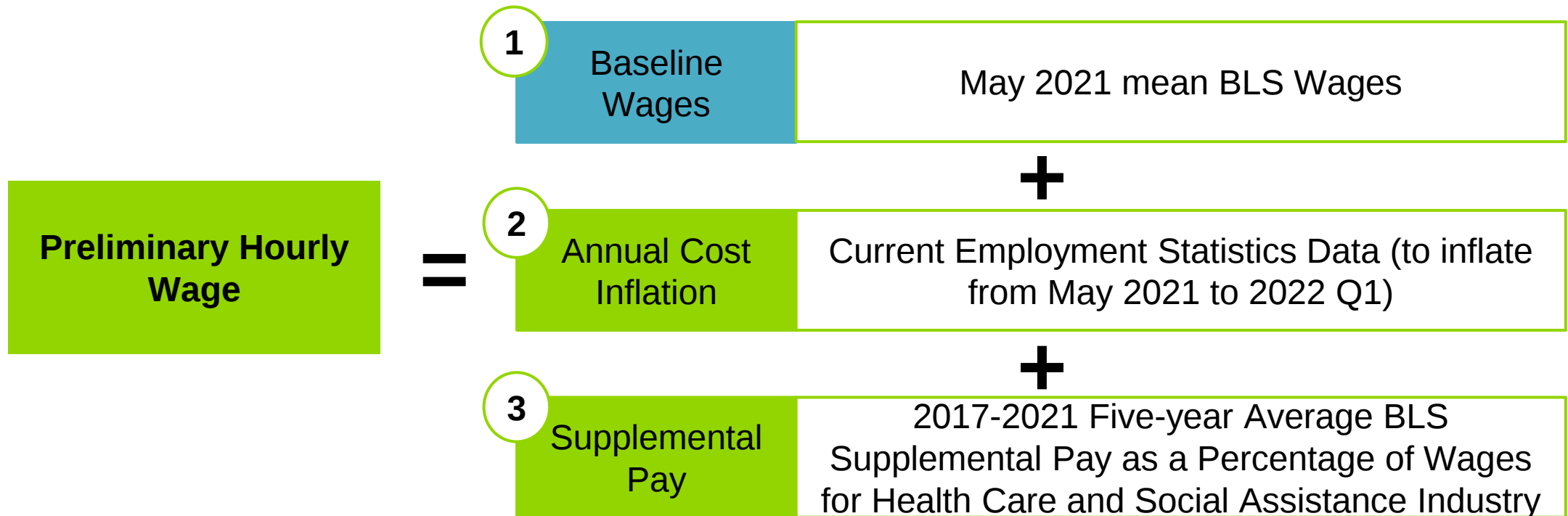
Feedback?



MODEL COMPONENTS: WAGES

Wage Adjustment

Wages are computed by inflating the baseline average hourly wages to reflect growth in costs as well as supplemental pay as a function of wage and labor costs.



Wage Analysis

DMS is considering the Cost and Wage Survey data from provider organizations as well as industry wide data sources to arrive at preliminary wage recommendations.

- Wage figures are weighted by base hours worked for a more representative sample.
- Wage figures for each job type are calculated across all programs and populations included in the rate study to promote service standardization.
- Each provider organization reported average hourly wages by position, which is considered the “baseline wage” and is unadjusted by overtime and supplemental pay.
- Wage enhancements including supplemental pay (e.g., non-production bonuses, shift differentials) and overtime pay were reviewed to adjust the baseline wages.
- Rates will ultimately be trended forward to estimate and reflect wages at a point in time closer to implementation.

BLS Benchmarking Comparisons

- The table below includes baseline survey wages compared to similar job classifications in the BLS data for key job types.
- The crosswalked classifications were chosen based on RSWG recommendations from the May meeting.

KY Provider Cost and Wage Survey Data			BLS Benchmark Wages (May 2021 KY Data Inflated to 2022 Q1)	
Job Type	Number of Individuals Reported (Survey)	CY2022 Q1 Survey Wage (Weighted)	Classification	Mean
Direct Support Professional (DSP)	2,683	\$12.60	31-1120 Home Health and Personal Care Aides	\$15.13
Support Broker	210	\$17.29	21-0000 Community and Social Services Occupations	\$23.97
Case Manager/Care Coordinator (billable)	200	\$21.11	21-0000 Community and Social Services Occupations	\$23.97
Driver	119	\$13.88	53-3053 Shuttle Drivers and Chauffeurs	\$13.52
Financial Manager	60	\$16.52	Average of two categories: 43-3051 Payroll and Timekeeping Clerks and 43-3021 Billing and Posting Clerk	\$22.02
Employment Specialist	32	\$15.69	21-1015 Rehabilitation Counselors	\$22.06
Chef/Cook	2	\$16.13	35-2012 Cooks, Institution and Cafeteria	\$14.36

Source: The Bureau for Labor Statistics (BLS), 2021 Kentucky Occupation Wages Available online: <https://www.bls.gov/data>

BLS Benchmarking Comparisons (continued)

- The table below includes baseline survey wages compared to similar job classifications in the BLS data for key job types.
- The crosswalked classifications were chosen based on RSWG recommendations from the May meeting.

KY Provider Cost and Wage Survey Data			BLS Benchmark Wages (May 2021 KY Data Inflated to 2022 Q1)	
Job Type	Number of Individuals Reported (Survey)	CY2022 Q1 Survey Wage (Weighted)	Classification	Mean
Behavioral Support Specialist/Behavioral Analyst	77	\$43.96	19-3033 Clinical and Counseling Psychologists	\$49.88
Licensed Practical Nurse (LPN)	45	\$20.44	29-2061 Licensed Practical and Licensed Vocational Nurses	\$24.43
Registered Nurse (RN)	27	\$27.99	29-1141 Registered Nurses	\$34.85
Respiratory Therapist	N/A	N/A	29-1126 Respiratory Therapists	\$28.60
Dietician	N/A	N/A	29-1031 Dietitians and Nutritionists	\$30.02

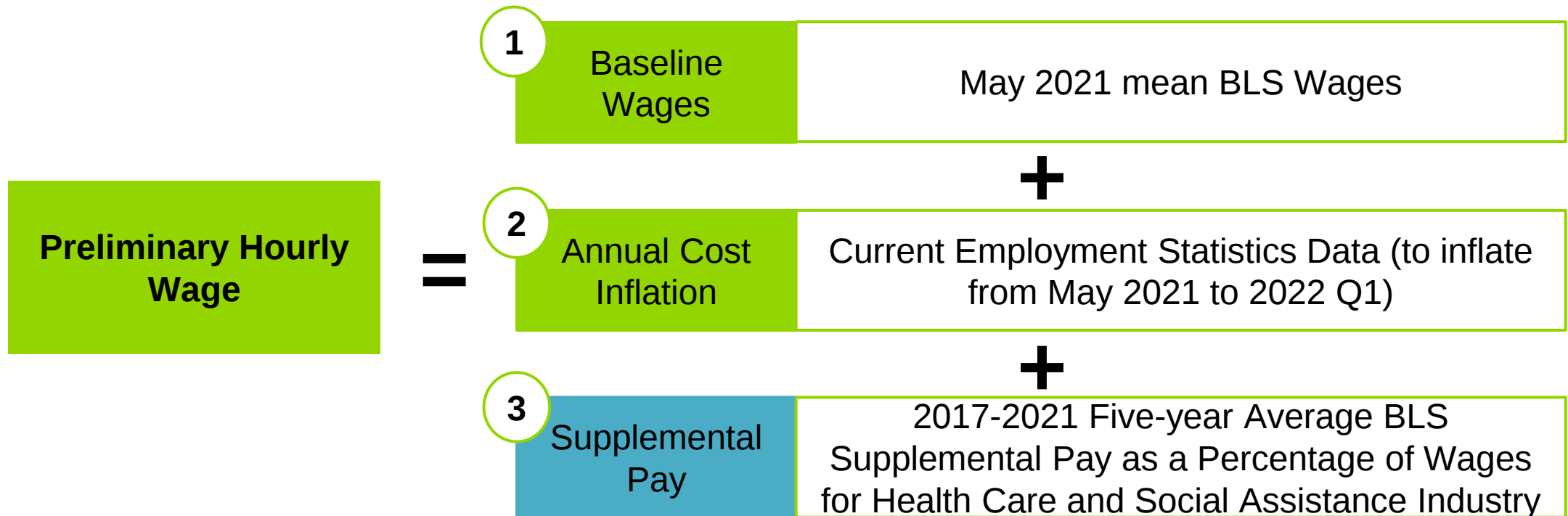
Source: The Bureau for Labor Statistics (BLS), 2021 Kentucky Occupation Wages Available online: <https://www.bls.gov/data>

Feedback?



Wage Adjustment

Wages are computed by inflating the baseline average hourly wages to reflect growth in costs as well as supplemental pay as a function of wage and labor costs.



Supplemental Pay: Cost and Wage Survey

Providers reported Total Supplemental Pay in the Provider Cost and Wage Survey that is inclusive of costs such as shift differentials, holiday pay, and non-production bonuses.

- Supplemental pay as a percentage of wages was derived from the total supplemental pay and total regular wages reported by providers.
- The table below includes supplemental pay calculated as a percentage of total wages as reported in the survey.
 - The survey responses indicated that not all providers reported supplemental pay. Overall, 62 percent of providers that submitted surveys reported supplemental pay for one or more job types.
 - Additionally, the supplemental pay reported in the survey varied widely from provider to provider.

Supplemental Pay as a Percentage of Total Regular and Supplemental Pay
Ratio of Total Supplemental Pay to Total Regular Wages and Supplemental Pay across all waivers and services (<i>Outliers of above 15 percent excluded</i>)
2.71%

Supplemental Pay: Bureau of Labor Statistics

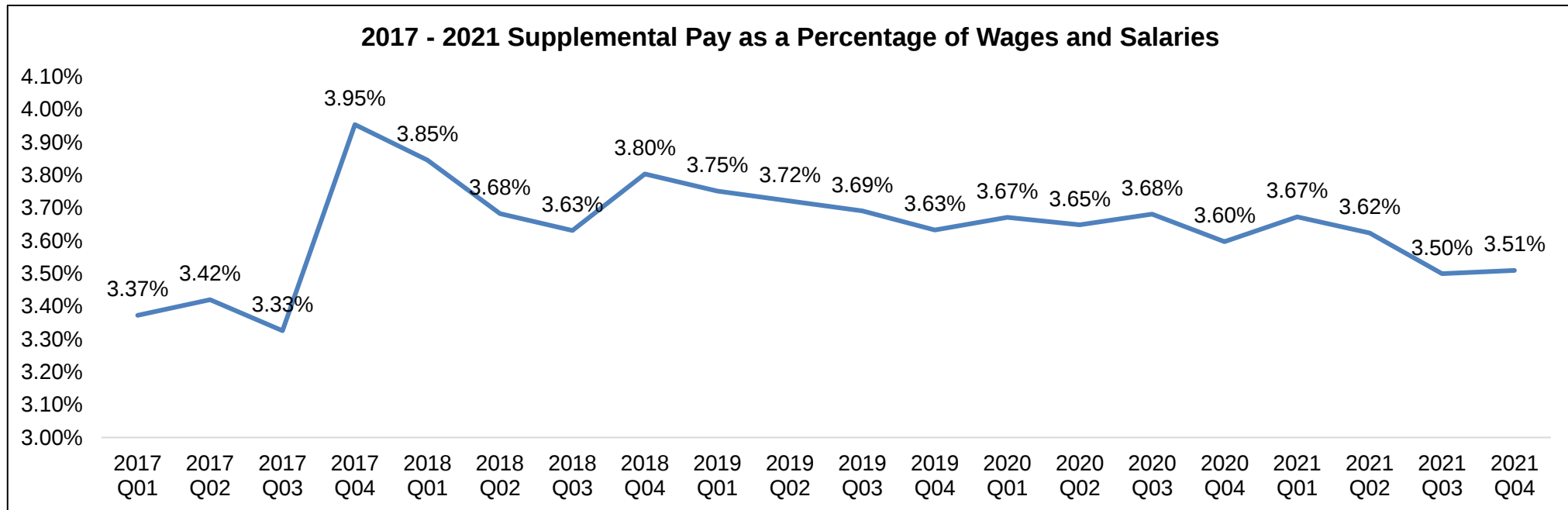
The BLS Employer Costs for Employee Compensation (ECEC) data series for the Health Care and Social Assistance industry analyzes total compensation by breaking down costs into hourly wage costs as well as expense categories related to mandatory taxes and benefits, insurance, retirement, paid time off, supplemental pay, and other benefits.

- The ECEC BLS data captures national hourly wages and supplemental pay for occupations comparable to Kentucky's HCBS on a quarterly basis.
- BLS supplemental pay includes overtime and premium, shift differentials, and nonproduction bonuses.
- In 2021 Q4, supplemental pay for this labor class amounted to \$0.59 for every hour of worker pay.

Source: The Bureau for Labor Statistics (BLS), Employer Costs for Employee Compensation. <https://www.bls.gov/news.release/ecec.toc.htm>

Supplemental Pay: BLS Quarterly Trends

- As depicted in the graph, BLS supplemental pay trends have remained relatively steady over the last five years, inclusive of the effects of the COVID-19 Public Health Emergency (PHE).
 - The average supplemental pay over the most recent five-year period from 2017-2021 is **3.64 percent**.



Source: The Bureau for Labor Statistics (BLS), Employer Costs for Employee Compensation. <https://www.bls.gov/news.release/eccec.toc.htm>

Supplemental Pay in Wage Assumptions

Guidehouse proposes using the BLS supplemental pay for wage assumptions for the following reasons:

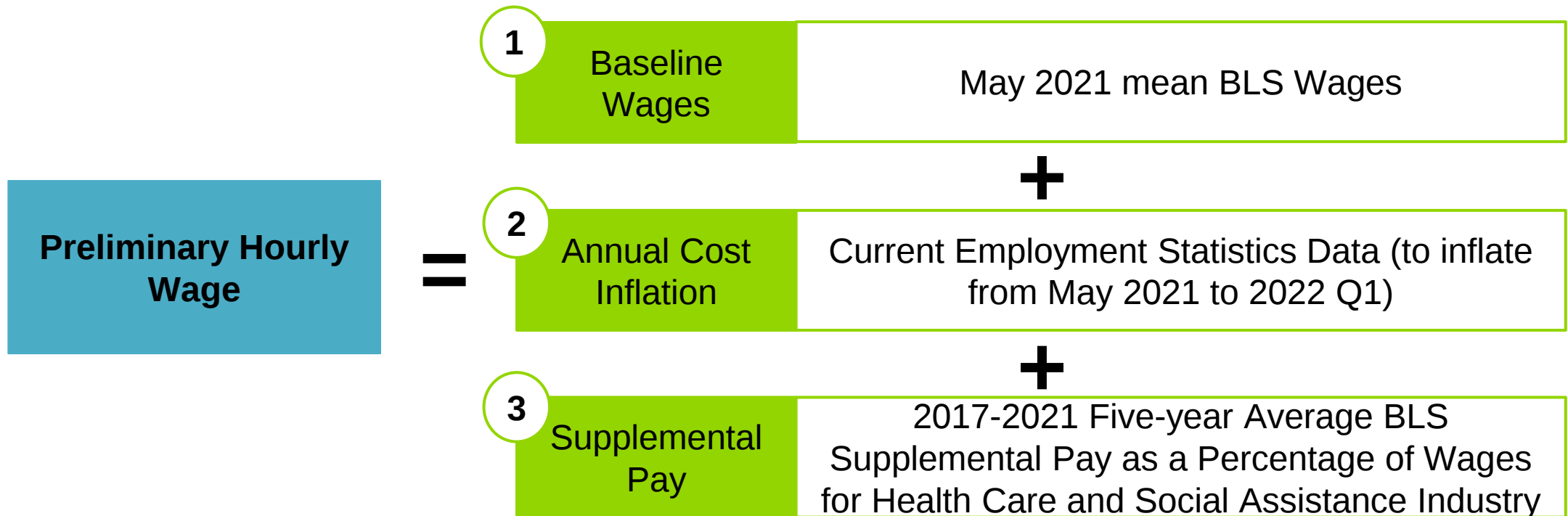
- Guidehouse recommends the BLS 2017-2021 average supplemental pay of **3.64 percent**. This time period would account for the most recent supplemental pay rates as well as the impacts of the COVID-19 PHE on the rates.
- Supplemental pay information collected from the survey deviates from the most recent and historical industry trends.
- The BLS data includes all supplemental cost components integral to overall compensation, and the data provides consistent and periodic trends that can be used to project a future state.

Feedback?



Wage Adjustment

Wages are computed by inflating the baseline average hourly wages to reflect growth in costs as well as supplemental pay as a function of wage and labor costs.



Preliminary Wage Component

The table below presents DMS's preliminary wage recommendations.

Job Type	Preliminary 2022 Hourly Wage
Behavioral Support Specialist/Behavioral Analyst	\$51.70
Case Manager/Care Coordinator (billable)	\$24.84
Chef/Cook	\$14.89
Dietician	\$31.11
Direct Support Professional (DSP)	\$15.68
Driver	\$14.02
Employment Specialist	\$22.86
Financial Manager	\$22.82
Licensed Practical Nurse (LPN)	\$25.32
Registered Nurse (RN)	\$36.12
Respiratory Therapist	\$29.64
Support Broker	\$24.84

Preliminary Wage = BLS mean + CES Inflation Factor + 3.64% Supplemental Pay

Preliminary Supervisor Wage Component

The table below presents DMS's preliminary wage recommendations for supervisors.

Job Type	Preliminary 2022 Hourly Wage for Supervisors
Behavioral Support Specialist/Behavioral Analyst	\$54.74
Case Manager/Care Coordinator (billable)	\$31.61
Chef/Cook	\$16.79
Dietician	\$34.10
Direct Support Professional (DSP)	\$19.33
Driver	\$16.07
Employment Specialist	\$25.68
Financial Manager	\$27.68
Licensed Practical Nurse (LPN)	\$26.42
Registered Nurse (RN)	\$41.36
Respiratory Therapist	\$32.85
Support Broker	\$31.61

Preliminary Wage = BLS 75th Percentile + CES Inflation Factor + 3.64% Supplemental Pay

MODEL COMPONENTS: EMPLOYEE-RELATED EXPENSES (ERE)

Setting a Competitive Benefits Package

Our assumptions for employee-related expenses (ERE) look at what a provider should be able to offer as a competitive benefits package.

- ERE, or fringe benefits, are costs to the provider beyond wages and salaries, such as unemployment taxes, health insurance, and paid time off (PTO). These fall into three distinct categories of benefits:
 - **Legally Required Benefits** including federal and state unemployment taxes, federal insurance contributions to Social Security and Medicare, and workers' compensation.
 - **Paid Time Off** including holidays, sick days, vacation days, and personal days.
 - **Other Components of ERE** including health, dental, and vision insurance and retirement.
- Not all providers who responded to the provider cost & wage survey have historically offered a “full” or competitive benefits package. However, our preliminary data includes information as to what benefits providers are currently offering.

Goal: Understand which benefits providers are offering and contributing to for their staff.

ERE Calculations

Calculating ERE requires analysis of the various benefits available to employees in the state based on cost survey, provider survey, and market data.

Inputs include the average cost of benefits, adjusted using take-up rate and part-time adjustment factor as appropriate:

Example calculation for health, dental, and vision insurance ERE components:

$$\frac{\text{Average Cost of Insurance} \times \text{Insurance Take-Up Rate} \times \text{Part-Time Adjustment Factor}}{\text{Annual Wage}}$$

Example calculation for the retirement ERE component:¹

$$\frac{\text{Annual Wage} \times \text{Benefit Cost: Percent of Wages} \times \text{Benefit Take-Up Rate} \times \text{Part-Time Adjustment Factor}}{\text{Annual Wage}}$$

1. Legally required benefits are calculated similarly, but the benefit take-up rate is excluded since these benefits must be offered to employees per state and federal statutes.

Legally Required Benefits

- **Unemployment Taxes:** Employers in Kentucky pay a federal unemployment tax (FUTA) of 6.00% of the first \$7,000 in wages and state unemployment tax (SUTA) of a range of 0.5% to 2.9% for positive rated employers and 7% to 9.5% for negative rated employers of the first \$10,800 in 2022 wages. Generally, if you paid wages subject to state unemployment tax, you may receive a credit of up to 5.4% of FUTA taxable wages. (Source: [IRS](#) and [Kentucky Career Center](#) and [KY Office of Unemployment Insurance](#))
- **Federal Insurance Contributions:** Employers pay a combined 7.65% rate of the first \$147,000 in wages for Social Security and Medicare contributions (Federal Insurance Contributions Act, or FICA). (Source: [SSA](#))
- **Workers' Compensation:** Employers in Kentucky pay an average effective tax of 2.40% toward workers' compensation insurance. (Source: *Provider Cost & Wage Survey*)

Legally Required Benefits	
Federal Unemployment Tax (FUTA)	0.60% after credit
State Unemployment Tax (SUTA)	2.70%*
Federal Insurance Contributions (FICA)	7.65%
Workers' Compensation	2.40%
Legally Required Benefits	11.11%**

* New Employer rate based on Kentucky Career Center.

** Legally required benefits may not apply to whole salary.

**This number is based on DSP wage of \$15.13

Retirement

Retirement plan contribution is the **average** reported in provider cost and wage survey.

Retirement	
Retirement Take Up Rate	30.55%
Retirement Plan Average Contribution	3.56%
ERE \$ Amount*	\$258
Percent of Annual Wage	0.82%

*Based on DSP wage of \$15.13

Paid Time Off Components of ERE

Paid Time Off	
Part Time Adjustment Factor	75.24%
Paid Time Off	29 days/yr.
ERE \$ Amount*	\$2,641
Percent of Annual Wage	8.39%

- Paid time off includes:
 - Holidays
 - Sick days
 - Vacation days
 - Personal days
- Providers reported a wide range of paid time off values.
- The paid time off of 29 days represents the **average** reported total days for all paid time off from the provider cost and wage survey.

*Based on DSP wage of \$15.13

Health Insurance Benefits Benchmarking

MEPS Comparison – Part Time Adjustment and Health Insurance

Metric	2022 KY Provider Survey Data	2020 MEPS Data (less than 50 employees)	2020 MEPS Data (50 + employees)	2020 MEPS Data Total
Employer Contribution to Health Insurance (Single Coverage)	\$6,255	\$5,339	\$5,422	\$5,414
Employer Contribution to Health Insurance (Family Coverage)	N/A	\$12,337	\$15,398	\$15,199
Weighted Employer Contribution to Health Insurance	\$6,255	\$7,108	\$8,937	\$8,771
Inflation**		10%	10%	10%
Inflated Employer Contribution to Health Insurance	\$6,255	\$7,819	\$9,831	\$9,648
Percent of full-time employees	75.2%	74%	86%	84%
Health Insurance Take-Up Rate	43%	61%	62%	62%
Monthly	\$521	\$652	\$819	\$804
Adjusted Annual	\$2,033	\$3,533	\$5,197	\$4,978

* Source: <https://www.meps.ahrq.gov/mepsweb/>

**Inflation source: <https://data.bls.gov/cgi-bin/cpicalc.pl>

Insurance and Other Benefits

Category	Take Up Rate	Monthly Premium	Annual Cost*	Percent of Annual Wage*
Health	61.7%	\$804	\$4,749	14.23%
Dental	43.3%	\$15	\$58	0.19%
Vision	43.0%	\$5	\$20	0.06%
Other Benefits	69.2%	\$26	\$162	0.52%

- Health take up rate and monthly premium is taken from MEPS data.
- Dental, Vision and Other Benefits are all derived from provider cost and wage survey responses.
- These values are **averages** from provider responses.
- Other benefits include survey-reported items such as:
 - Life insurance
 - Disability insurance
 - Cell phone and/or internet stipend
 - Transportation stipend
 - Tuition reimbursement
 - Gym membership

*Based on DSP wage of \$15.13

Employee-Related Expenses (ERE)

ERE is calculated as a percentage of wages

- The three components of ERE (Legally Required Benefits, Paid Time Off Benefits, and Other Benefits) are added together to determine total ERE.
- ERE will be calculated for all job types, but only one is shown here for illustrative purposes

Calculation Components		<i>Direct Support Professional (DSP)</i>	Notes
Hourly Wage	A	\$15.13	
Annual Wages – FY2022	$B = A * 2080$	\$31,469	
Legally Required Benefits	C	\$3,496 (11.1%)	Shown as percentage and dollar portion of annual wage
Retirement Benefits	D	\$258 (0.8%)	
Paid Time Off Benefits	E	\$2,641 (8.4%)	
Insurance and Other Benefits	F	\$4,720 (15.0%)	
Total ERE per DSP	$G = C + D + E + F$	\$11,115 (35.3%)	
Hourly Wage with ERE	$H = (1+G) * A$	\$20.47	Using Total ERE Percentage
Annual Wage with ERE	$I = H * 2080$	\$42,578	Using Total ERE Percentage

Feedback?



Topics for Upcoming Meetings

MAR
Survey Review and Provider Communication Approach • Review draft rate survey and provide input • Additional education on external data use vs. new data needs • Communication approach

APR
Discuss Model Assumptions • Review and update key model assumptions from previous rate study • Model assumptions may include program support cost factors, administrative overhead, productivity and staffing patterns, etc.

MAY
Review Survey Results • Initial key takeaways from survey • Review wages and benefit model

JUN
Discuss Model Assumptions (continued) • Review and update key model assumptions from previous rate study • Model assumptions may include program support cost factors, administrative overhead, productivity and staffing patterns, etc.

JUL
Discuss Model Assumptions (continued) • Review and update key model assumptions from previous rate study • Model assumptions may include program support cost factors, administrative overhead, productivity and staffing patterns, etc.

AUG
Share Proposed Rate Models and Fiscal Impact • Final model results • Overall fiscal impact and key takeaways • Next steps for 1915(c) waiver amendments and public comment

Note: Meeting topics are tentative and subject to change at the discretion of CHFS.

Changes for Future Meetings

- We are looking for alternate times for the next meetings to accommodate calendars going forward
- The rate study team has discussed your requests for increased transparency into the rate calculation process and are strategizing on how to leverage your time wisely but offer needed and important details
 - Additional transparency may require more time in the existing workgroup meetings *and/or* additional meetings with sub-groups of stakeholder representatives to focus on specific services

Questions or Comments?



Please contact **CHFS.RateStudyWorkGroup@ky.gov** or **KYHCBSRateStudy@guidhouse.com** with any questions or additional feedback from today's discussion.

Contact



KY Rate Study Work Group Mailbox

For general rate study questions

CHFS.RateStudyWorkGroup@ky.gov

Guidehouse Rate Study Mailbox

For survey-specific for technical rate study questions

KYHCBSRateStudy@guidhouse.com

Pam Smith

Director-Division of Community Alternatives, DMS

Pam.smith@ky.gov

Elizabeth Cahn

Managing Consultant, Guidehouse

elizabeth.cahn@guidhouse.com

Appendix

BLS Benchmarking Comparisons: Unused Job Titles

- The table below includes baseline survey wages compared to similar job classifications in the BLS data for key job types.
- The job types were chosen based on RSWG recommendations from the May meeting.

KY Provider Cost and Wage Survey Data		BLS Benchmark Wages (May 2021 KY Data Inflated to 2022 Q1)	
Job Type	CY2022 Q1 Survey Wage (Weighted)	Classification	Mean
Case Manager/Care Coordinator (non-billable)	\$16.51	21-0000 Community and Social Services Occupations	\$23.97
Certified Nursing Assistant (CNA)	\$13.63	31-1131 Nursing Assistants	\$15.17
Food Prep Worker/Server	\$13.31	35-0000 Food Preparation and Serving Related Occupations	\$12.78
Home Health Aide (HHA)	\$13.51	31-1120 Home Health and Personal Care Aides	\$15.13
Licensed Clinical Social Worker	N/A	19-3039 Psychologists, All Other	\$50.44
Psychiatrist	N/A	29-1223 Psychiatrists	\$135.15
Psychologist	N/A	19-3039 Psychologists, All Other	\$50.44
Social Worker (Other)	\$19.94	21-1029 Social Workers, All Other	\$29.43

Source: The Bureau for Labor Statistics (BLS), 2021 Kentucky Occupation Wages Available online: <https://www.bls.gov/data>

Additional BLS Comparisons: Other Industries

- The table below includes wages for job classifications in the BLS data for job types in other industries.
- The classifications are demonstrated for comparison purposes only and were chosen based on feedback from the RSWG.

BLS Benchmark Wages (May 2021 KY Data Inflated to 2022 Q1)		
BLS ID	BLS Classification	Mean
35-3023	Fast Food and Counter Workers	\$11.24
35-3041	Food Servers, Nonrestaurant	\$13.55
41-2011	Cashiers	\$11.97
41-2031	Retail Salespersons	\$14.63
53-7065	Stockers and Order Fillers (corresponds to Amazon warehouse worker)	\$16.30

Source: The Bureau for Labor Statistics (BLS), 2021 Kentucky Occupation Wages Available online: <https://www.bls.gov/data>

Year Over Year Wage Comparison

- The below describes how wages have changed from the prior rate study BLS data to this rate study, by job type.

Job Type	2019 Wages from BLS	Preliminary 2022 Hourly Wage	Percent Change
Behavioral Support Specialist/Behavioral Analyst	\$46.15	\$51.70	12%
Case Manager/Care Coordinator (billable)	\$19.95	\$24.84	25%
Chef/Cook	\$11.38	\$14.89	31%
Dietician	\$27.89	\$31.11	12%
Direct Support Professional (DSP)	\$11.38	\$15.68	38%
Driver	\$11.38	\$14.02	23%
Employment Specialist	\$17.30	\$22.86	32%
Financial Manager	\$19.51	\$22.82	17%
Licensed Practical Nurse (LPN)	\$20.26	\$25.32	25%
Registered Nurse (RN)	\$29.70	\$36.12	22%
Respiratory Therapist	\$23.79	\$29.64	25%
Support Broker	\$19.95	\$24.84	25%

Source: The Bureau for Labor Statistics (BLS), 2021 Kentucky Occupation Wages Available online: <https://www.bls.gov/data>