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**Kathy Cooper**

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**From:** Dave Wyher <dwyher@deltaweb.org>  
**Sent:** Tuesday, October 16, 2018 9:47 AM  
**To:** IRRC  
**Cc:** Shirley Walker  
**Subject:** Regulation 14-540: Home and Community Based Supports and Licensing

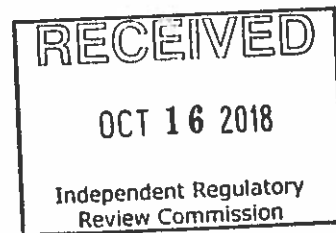
Dear Sirs:

I write to support the comments submitted by Pennsylvania Advocacy and Resources for Autism and Intellectual Disability (PAR) as recently submitted to the IRRC. Delta Community Supports has been a provider for over 40 years in the Pennsylvania system of services to the population covered by these proposed regulations. These are the most far reaching of any regulations promulgated by the Department of Human Services. Our concern is that the regulations must be specific in their intent and that the intent must be made clear.

Of particular concern is the section related to rate setting: **6100.571 Fee Schedule Rates**. Clarification is required in order for providers to understand the specific methodology to be used under these regulations in setting rates, in periodic review and reissuing rates. Transparency in the form of greater specificity on rate setting methodology is essential. In addition, the methodology must take into account changing economic factors if services are to be reimbursed at rates sufficient to perform all that the regulations require. The rate setting must be capable of delivering the results described by the entire regulation. Without a set of regulations that has the structural supports to enable conformance the service system will continue to weaken under the stresses we now are experiencing.

I commend the Department of Human Services for the many positive improvements found in the proposed regulations. Thank you for your work in pursuing the clarification and transparency needed to make these regulations as effective as possible in advancing safe and productive services in a system that can sustain the effort.

Respectfully,  
David A. Wyher  
President/CEO



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**David A. Wyher**  
President/CEO

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