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From: Kristen Rantanen <Kristen.Rantanen@jevs.org>
Sent: Thursday, September 14, 2017 9:15 AM
To: PW, ODPCOMment
Cc: Jay Spector; John L. Colborn; Clara Thompson
Subject: JEVS Human Services comments on the Advance Notice of Final Rulemaking

JEVS Human Services urges the Department of Human Services, Office of Development Programs to include the following provision in the proposed new Home and Community Based Services (HCBS) rate setting regulations:

"Every fiscal year, the Department and ODP will determine and include in the Department's annual recommended budget request to the Governor the funding amount necessary to support the application of a nationally recognized inflation index (such as the Medicare Home Health Market Basket Index) to recalculate the HCBS fee schedule rates and fees forward through the following fiscal year."

Our comment asks the Department and ODP to recognize how market place forces will impact the HCBS service delivery system during a new fiscal year and to request the Governor to address that impact in his annual budget request to the General Assembly. Without this type of regulatory requirement, fee schedule rates can be frozen for years as they have been in the past. Unlike some other human services, home and community based intellectual disability and autism services (ID/A) are solely funded by the government and receive no private pay or insurance. These fee schedule freezes directly impact the ability of providers to attract and retain skilled, committed staff and to provide the high quality services the most vulnerable Pennsylvanians deserve.

Respectfully submitted, on behalf of JEVS Human Services.

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