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14-540 #352

From: Nofre P.Vaquer <nvaquer@sparcphilly.org>
Sent: Wednesday, September 13, 2017 8:42 AM
To: PW, ODPCOMment
Subject: Advance Notice of Final Rulemaking Comment

I am writing to urge ODP to include the following provision in the proposed new 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.'

My 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 wrongfully done 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. An annual or multi-year fee schedule rate freeze adversely affects quality of care and access to care and is fundamentally unfair to the dedicated direct support professionals who deserve to be paid a living wage.

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