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Adams-Moore, Denise

From: Elena Platonova <elena@RHD.ORG>
 Sent: Thursday, September 14, 2017 3:15 PM
 To: PW, ODPCOMMENT
 Cc: Marco Giordano; Dennis Roberts; Grace Dempster; Mary Beth Tronchetti
 Subject: "Advance "Notice"

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 2017 SEP 18 P 2:21

Dear Ms. Mochon,

Resources for Human Development is a PA intellectual disability and autism provider serving about 300 individuals in more than 165 residential homes and providing community based services to 120 individuals in other than residential settings.

We appreciate ODP's transparency and willingness to engage providers in discussion on proposed DHS regulations and opportunity to participate in rate setting process.

Resources for Human Development present comments to ODP's Advance Notice of Final Rulemaking below:

1. Request 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.'

We ask 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.

2. Request ODP to revisit the following ODP Fee Schedule Development/Assumptions provided by Department as a basis for rate setting methodology (this section is submitted to comment on assumptions not proposed rulemaking, as it was advised by the ODP on 08/17/17):

-DSP Full Time/Part Time Split: Currently in assumptions - 30% FT/ 70% PT. In reality - 70% FT /30% PT. The misrepresentation of this split causes miscalculation of benefits cost, which is a key factor in addressing "DSP crisis"

- Supported Living/Life Sharing Specialist - current ration in assumptions is 1:20 (1:30 in initial publications). Request ODP to revise it to 1:15 maximum.

- Request ODP to revise Administration Percentage from 10% to 15%. Administration Overhead percentage of 15% has been reported in all cost reports since the IDD system went through the transformation to fee for service 10 years ago. The IDD services are highly regulated and require additional administrative support in areas like investigations, trainings, provider monitoring, billing, management of custodial funds and Room and Board contracts.

Resources for Human Development hopes you take our comments in consideration and we value your commitment collaborating with providers.

Sincerely,

Elena Platonova
Director Of Finance and Operations for
PA IDD Division

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