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Adams-Moore, Denise

Form Letter C 7

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From: Patrick DeMico <patrickdemico@outlook.com>
 Sent: Monday, September 18, 2017 10:49 AM
 To: PW, ODPCOMMENT
 Subject: Comments to 47 Pa. Bulletin 4831, August 19, 2017 Public Notice re 6100.571 Fee Schedule Rates

To: Julie Mochon, Policy Director
 Office of Developmental Programs
 Room 502, Health and Welfare Building
 625 Forster Street
 Harrisburg, PA 17120.

Electronic comments submitted to RA-odpcomment@pa.gov

From: Patrick DeMico
 2216 Longview Drive
 Greensburg PA 15601

Subject: Comments to 47 Pa. Bulletin 4831, August 19, 2017 Public Notice

RE: Home and Community-Based Supports and Licensing; Fee Schedule Rates; Advance Notice of Final Rulemaking (Title 55 Chapter §6100.571, Fee Schedule Rates)

Date: September 18, 2017

Comment:

The Department must adopt in regulation a nationally recognized market index to adjust fee schedule rates annually.

Proposed Change:

As published,

(b) The Department will [refresh the market-based data used] examine and use the data sources set forth in subsection (a) to establish fee schedule rates at least every 3 years.

Proposed revision,

(b) The Department will [refresh the market-based data used] examine and use the data sources set forth in subsection (a) to establish fee schedule rates at least every 3 years, and will adjust rates annually thereafter within each three-year cycle, using a nationally recognized market index.

Reasoning and Support:

1. Historically, fee schedule rates supporting people with intellectual disability have not been adjusted following their inception. An appropriate index should be selected and published in advance of its application.
2. Current fee schedule rates do not support a living wage for Direct Support Professionals statewide.

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3. Fee schedule rates that do not keep pace with inflation and other economic market forces effectively result in decreased quality and services to people with intellectual disability and autism.
4. Without fee schedule rates that support a living wage, reimburse provider costs, allow for a reasonable retention factor, and include an index strategy that keeps pace with inflation; the resulting rates will not be sufficient to achieve efficiency, economy, and quality of care.
5. Fee schedule rates that do not reflect adequate reimbursement levels will not be sufficient to enlist or retain qualified providers.

Thank you for the opportunity to provide these comments, and for taking the time to review them.