

3/16/17

14-540 (#371)

Adams-Moore, Denise

From: Justina Cunningham <justina@acmeproviders.com>
Sent: Friday, September 15, 2017 1:16 PM
To: PW, RateSetting; PW, ODPCComment
Subject: Advance Notice PN Fee Schedule Rates
Attachments: Comments to 47 PA Bulletin 4831 Fee Schedule Rates.docx

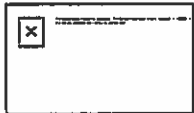
Form Letter D

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Please accept my attached comments regarding the Advance Notice of Final Rulemaking (47 Pa B 4831) of the Pa Bulletin.

Sincerely,
Justina Cunningham, MA, MS
Acme Providers Inc. CEO
Justina@AcmeProviders.com
724-972-7566

When you focus on problems, you get more problems. When you focus on possibilities, you have more opportunities. – Zig Ziglar



Impacting the lives of adults with developmental disabilities to live fully.

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1924B State Route 66
Greensburg, PA 15601
www.AcmeProviders.com
justina@acmeproviders.com

RECEIVED
IRRC

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
And ra-ratesetting@pa.gov

2017 SEP 20 A 10: 21

From: Justina Cunningham
1924B State Route 66
Greensburg, Pa 15601
Phone 724-972-7566

Subject: Comments to 47 Pa. Bulletin 4831, August 19, 2017 Public Notice
Advance Notice of Final Rulemaking
Title 55 Chapter §6100.571, Fee Schedule Rates

Date: September 15, 2017

Comment:

The Department must adopt in regulation a nationally recognized market index to adjust fee schedule rates annually. I request that DHS annually make it known to the Governor, public and General Assembly about the need for critical funding to sustain IDD services. Please make these changes to the proposed new HCBS rate setting regulations.

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 using a nationally recognized market index.

Reasoning and Support:



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1. We have seen in the past, fee schedule rates supporting people with intellectual disability have been set initially and never changed after that.
2. Current fee schedule rates do not support a living wage for Direct Support Professionals statewide. Low wages will not help recruit new staff or retain current staff because other job options pay more.
3. We do not want to see a decline in the quality of services for people with intellectual disability and autism because the fee schedule rates do not keep pace with inflation and other economic market forces.
4. Without an index strategy that keeps pace with inflation, the diminished value and purchasing power of fee schedule rates over time will preclude the Department and its regulated providers from achieving efficiency, economy, and quality of care, and the reimbursement levels will not be sufficient to enlist or retain providers.

Thank you for your time and attention to this matter.

Sincerely,

Justina Cunningham

Acme Providers Inc. CEO

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14-540 #392

Adams-Moore, Denise

From: Carol DeMico <caroldemico@outlook.com>
Sent: Sunday, September 17, 2017 10:44 PM
To: PW, ODPCOMMENT
Subject: Comments to 47 Pa. Bulletin 4831, August 19, 2017 Public Notice

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: Carol 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.
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.

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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.

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11-540 #390

Adams-Moore, Denise

From: Patrick DeMico <patrickdemico@prolificdynamics.com>
 Sent: Sunday, September 17, 2017 8:46 PM
 To: PW, ODPCcomment
 Subject: Comments to Public Notice 47 PA Bulletin 4831 re 6100.571 Fee Schedule Rates
 Attachments: TPA Comments Fee Schedule Rates_Advance Notice of Final Rulemaking 6100_571 2017 09 17.docx

Please find attached and below comments to the Advance Notice of Final Rulemaking published August 19, 2017. Thank you for the opportunity to comment, and for taking the time to review.

*Patrick DeMico, Executive Director
 The Provider Alliance*



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

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 2017 SEP 20 A 10:46

From: Patrick DeMico, Executive Director
 The Provider Alliance
 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 17, 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.
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.

Patrick DeMico, Executive Director
The Provider Alliance

