

3160

14-340 #405

Adams-Moore, Denise

Form Letter D 4-10

**From:** Mary Mossburg <mary.mossburg@arcfayette.org>  
**Sent:** Monday, September 18, 2017 12:30 PM  
**To:** PW, ODPComent  
**Subject:** Comments for 47 PA Bulletin 4831  
**Attachments:** Comments for 47 PA. Bulletin 4831.docx

Please find attached my comments for 47 PA Bulletin 4831.

Sincerely,

Mary Mossburg  
 Executive Director  
 The Arc of Fayette County  
 724.438.9042 Extension 203  
[mary.mossburg@arcfayette.org](mailto:mary.mossburg@arcfayette.org)  
[www.arcfayette.org](http://www.arcfayette.org)

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The Arc Fayette County  
80 Old New Salem Road  
Uniontown, PA 15401

T 724 438-9042  
F 724 438-2405  
[www.arcfayette.org](http://www.arcfayette.org)

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](mailto:RA-odpcomment@pa.gov)

From: Mary Mossburg, Executive Director  
The Arc of Fayette County  
80 Old New Salem Road  
Uniontown, PA 15401

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.

**Achieve with us.**

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.

Sincerely,  
Mary Mossburg, Executive Director  
The Arc of Fayette County

Adams-Moore, Denise

14-540 #400

**From:** Mary Keefer <mary.keefe@arcfayette.org>  
**Sent:** Monday, September 18, 2017 1:37 PM  
**To:** PW, ODPComment  
**Subject:** Public Comment on 47 PA Bulletin 4831  
**Attachments:** Comments for 47 PA. Bulletin 4831.docx

Please find attached the comments for 47 PA Bulletin 4831.  
Thanks

--  
Mary Keefer  
Chief Financial Officer  
The Arc of Fayette County  
724.438.9042 Extension 207  
[mary.keefe@arcfayette.org](mailto:mary.keefe@arcfayette.org)  
[www.arcfayette.org](http://www.arcfayette.org)



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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](mailto:RA-odpcomment@pa.gov)

From: Mary Keefer, Chief Financial Officer  
The Arc of Fayette County  
80 Old New Salem Road  
Uniontown, PA 15401

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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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.

Sincerely,  
Mary Keefer, Chief Financial Officer  
The Arc of Fayette County



14-540 #410

**Adams-Moore, Denise**

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**From:** Lisa Friend <lisa.friend@arcfayette.org>  
**Sent:** Monday, September 18, 2017 1:40 PM  
**To:** PW, ODPCComment  
**Subject:** Comments for 47 PA. Bulletin  
**Attachments:** Comments for 47 PA. Bulletin 4831.docx

Please see attached. Thank-you so much!

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Lisa Friend  
Adult Training Facility Director  
The Arc of Fayette County  
724-438-9042 ext. 218  
[www.arcfayette.org](http://www.arcfayette.org)

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80 Old New Salem Road  
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T 724 438-9042  
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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](mailto:RA-odpcomment@pa.gov)

From: Lisa Friend, ATF Director  
The Arc of Fayette County  
80 Old New Salem Road  
Uniontown, PA 15401

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

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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.
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Sincerely,  
Lisa Friend, ATF Director  
The Arc of Fayette County

Adams-Moore, Denise

14-540 (#412)

**From:** Jim Kirk <jkirk@MainStayLifeServices.org>  
**Sent:** Monday, September 18, 2017 1:43 PM  
**To:** PW, ODPCOMment  
**Subject:** Comments 47 PA Bulletin 4831  
**Attachments:** Mainstay ..... Comments to 47 Pa Bulletin 4831.docx

Attached are Mainstay's comments on the Bulletin 4831.

James Kirk | Chief Executive Officer  
Mainstay Life Services  
200 Roessler Road | Pittsburgh, PA 15220  
Tel: 412.344.3640 | Fax: 412.344.5486  
Cell: 412.860.2323  
Email: JKirk@MainstayLifeServices  
Web: [www.mainstaylifeservices.org](http://www.mainstaylifeservices.org)



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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](mailto:RA-odpcomment@pa.gov)

From: James R. Kirk, CEO  
Mainstay Life Services  
200 Roessler Road  
Pittsburgh, PA

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)

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Adams-Moore, Denise

14-540 #413

**From:** Dana Zinck <dana.zinck@arcfayette.org>  
**Sent:** Monday, September 18, 2017 1:46 PM  
**To:** PW, ODPComment  
**Subject:** Comments to 47 Pa. Bulletin 4831, August 19, 2017 Public Notice  
**Attachments:** Comments for 47 PA. Bulletin 4831.docx

--  
Dana Lynn Zinck  
Assistant Executive Director  
The Arc of Fayette County  
(724) 438-9042 Ext. 211  
[www.arcfayette.org](http://www.arcfayette.org)

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Uniontown, PA 15401

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F 724 438-2405  
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To: Julie Mochon, Policy Director  
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Electronic comments submitted to RA-odpcomment@pa.gov

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The Arc of Fayette County  
80 Old New Salem Road  
Uniontown, PA 15401

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

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Sincerely,

Dana Zinck  
Assistant Executive Director  
The Arc of Fayette County

**Adams-Moore, Denise**

14-540 #418

**From:** snagy@stepbystepusa.com  
**Sent:** Monday, September 18, 2017 2:43 PM  
**To:** PW, ODPCcomment  
**Subject:** Home and Community-Based Supports and Licensing; Fee Schedule Rates; Advance Notice of Final Rulemaking (Title 55 Chapter §6100.571, Fee Schedule Rates)

Comment:

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Sue Nagy  
Program Director  
412-655-8677, x206  
Step by Step, Inc.

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Adams-Moore, Denise

14-540 #424

**From:** Stacey Cannon <scannon@diversifiedfamily.org>  
**Sent:** Monday, September 18, 2017 5:14 PM  
**To:** PW, ODPCComment  
**Subject:** Fee Schedule Rates Advance Notice of Final Rulemaking (regulation 6100.571)  
COMMENTS  
**Attachments:** fee schedule comments.docx

Please add or review our comments to the notice of final rulemaking comment section.

Thank you,

Stacey Cannon

Program Director  
Diversified Family Services

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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: Stacey Cannon, Program Director  
Diversified Family Services  
5454 East State Street P.O. Box 1027  
Hermitage, PA 16148

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)

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Stacey Cannon  
Program Director  
Diversified Family Services