## Adams-Moore, Denise

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From:

Katie Leaman < kleaman@friendshipcommunity.net>

Sent:

Monday, September 18, 2017 2:52 PM

To:

PW, ODPComment

Cc:

Gwen Schuit; Chuck Condran

Subject:

**Advance Notice Comments** 

Attachments:

DOC091817.pdf

Hi Ms. Mochon,

Attached are Friendship Community's comments on ODP's Advance Notice of Final Rulemaking.

Thank you,

Katie Leaman

Executive Assistant/Events Coordinator

Friendship Community 1149 East Oregon Road Lititz PA 17543 717.656.2466 ext. 1101 717.656.0459 fax FriendshipCommunity.net FriendshipArt.net







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## Impacting the World with Capabilities



Office of Development Programs Department of Human Services Room 502, Health & Welfare Building 625 Forster Street Harrisburg, PA 17120



Re: Friendship Community's Comments on the Proposed Fiscal Year 2017-2018 Fee Schedule Rates and Established Fees for Consolidated and Person/Family Directed Walver Services

Dear Ms. Mochon:

Friendship Community is a Provider of services for people with Intellectual / Developmental Disability and or Autism in Lancaster and Lebanon Counties and has done so since 1972.

We appreciate that the proposed Fee Schedule Rates and the Established Fees reflect the needed increases in fees that are so necessary to continue to provide the needed services for the individuals we serve in various settings. We are in a time that requires Providers to recruit dedicated employees that through training, can become qualified rather quickly and such applicants are in high demand by numerous industries other than IDD/A, thus it is a highly competitive market right now. The high rate of staffing turnover that providers are experiencing is unprecedented. We believe in providing high quality care and services. The turnover experienced due to the current wages and all of the demands that new regulations, policies and procedures are creating, the need for the additional funds are absolutely necessary to move forward. This will help to support these highly complex individuals in various ways throughout their lifespan.

We truly appreciate the sincere efforts by Governor Wolf and the General Assembly to include additional funding in the 2017-2018 PA State Budget 2017-2018 General Appropriations for these issues we have presented which impact care and support for individuals with an intellectual disability or autism ("ID/A").

The Notice states that the fees "are developed using a market-based approach." The definition of the "market-based approach" for ID/A services needs to be explained by the Department. The Department controls the nature and scope of the services provided and the fees to be paid for the services provided. ID/A providers are affected by the market costs for housing, utilities, food and current geographic data related to living wages and each needs to be taken into consideration when annually establishing the fees to be paid for the services provided.

The Department should include in its description of the factors involved in developing "sufficient rates," the fundamental factor of meeting individuals' actual service needs and the quality of care provided to the individuals. Market prices for comparable goods or services for the geographic area need to be considered.

Thank you for the opportunity to provide comments to the Proposed Fiscal Year 2017-2018 Fee Schedule Rates and Established Fees for Consolidated and Person/Family Directed Waiver Services.

Sincerely,

Gwen Schuit, BSN, MEd, NHA **CEO Friendship Community** 

Chuck Condran, Director of Finance Friendship Community