

Adams-Moore, Denise

14-540 #399

From: Susan Lautenbacher <SLautenbacher@Larkent.org>
Sent: Monday, September 18, 2017 9:17 AM
To: PW, ODPComent
Subject: comments
Attachments: Comments Rate Setting Methodology 2017 09 17.docx

Please accept the attachments as comments for rate setting methodology.

Susan Lautenbacher, Ph.D.
Chief Executive Officer

Helping Individuals Become Self-Reliant and Integrated into the Community



ENTERPRISES, INC.
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To: Department of Human Services
Office of Developmental Programs
Division of Provider Assistance and Rate Setting
4th Floor, Health and Welfare Building
625 Forster Street
Harrisburg, PA 17120
Electronic comments submitted to
ra-ratesetting@pa.gov using subject header "PN Fee Schedule"

RECEIVED
IRRC
2017 SEP 20 A 10:57

From: Susan Lautenbacher, Ph.D.
315 Green Ridge Drive
New Castle, PA 16105

Subject: PN Fee Schedule

RE: Comments to 47 Pa. Bulletin 4919, August 19, 2017 Public Notice
Rate-Setting Methodology for Consolidated and Person/Family Directed Support
Waiver-Funded and Base-Funded Services for Individuals Participating in the Office of
Developmental Programs Service System

Date: September 17, 2017

Published Statement:

The above referenced notice in the Pennsylvania Bulletin states:

Cost of Living Adjustment (COLA)

After the unit costs for each residential habilitation eligible, life sharing eligible and transportation trip service were adjusted as previously described, a total COLA of 0.00% was applied to establish each provider's proposed rates for FY 2017-2018.

Comments:

1. The Department must adopt in regulation a nationally recognized market index to adjust fee schedule and cost-based rates annually.
2. Without accounting for normal and reasonable inflationary adjustments, the Department cannot assert that resulting rates for FY 2017-2018 are adequate to cover provider costs.

Reasoning and Support:

1. Historically, fee schedule rates supporting people with intellectual disability have not been adjusted following their inception.
2. Current cost-based rates do not support a living wage for Direct Support Professionals statewide.
3. Cost-based rates as designed and implemented under this methodology do not keep pace with inflation and other economic market forces that affect providers and those in their care.

4. Rates that do not capture the actual cost of doing business, effectively result in decreased quality and services to people with intellectual disability and autism.
5. Without cost-based (or fee schedule) rates that support a living wage, capture actual 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.
6. Under the proposed methodology, 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 yours,

Lark Enterprises, Inc.

Susan Lautenbacher, Ph.D.