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**From:** Douglass Craig <CDouglass@pittsburghmercy.org>  
**Sent:** Monday, September 18, 2017 5:44 PM  
**To:** PW, ODPCOMMENT  
**Subject:** Comments from Pittsburgh Mercy - Re: 47 Pa. Bulletin 4831, August 19, 2017 Public Notice

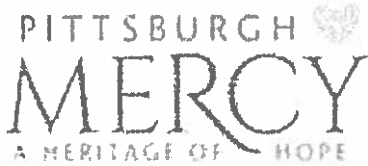
Fee Schedule Rates, Fee Schedule Methodology, and Proposed Fee Schedule

We believe, as many of our colleagues do, the Department must adopt in regulation a nationally recognized market index to adjust fee schedule rates annually. Historically, fee schedule rates supporting people with intellectual disability have not been adjusted since they've been put in place. Further, the current fee schedule rates do not support a living wage for Direct Support Professionals in Southwestern PA (or statewide) and the fee schedule rates have not kept pace with inflation and other economic forces that ultimately result in decreased quality and services to people with intellectual disability and autism. Without fee schedule rates that support a living wage, reimburse provider costs, and include an index strategy that keeps pace with inflation, the resulting rates will never be sufficient to achieve efficiency, economy, and quality of care.

**Craig Douglass**

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