

3160

14-540 # 380

Adams-Moore, Denise

From: Laura Princiotta <lprinciotta@sparcphilly.org>
Sent: Friday, September 15, 2017 4:49 PM
To: PW, ODPComent
Subject: comments on rate-setting

Thank you for allowing us to weigh in on advanced rule-making and on fee schedule rates. My comments follow:

1. Rates should be assessed annually - every three years is insufficient. Costs can, and do, increase exponentially year over year and waiting three years for an assessment puts service delivery at risk. No provider wants to limit services, however if the reimbursement rates do not cover costs, there is little choice. Recommendation would be for an annual review of rates and adjustments based on cost of living increases.

2. Statewide rates make very little sense and it's difficult to imagine what the thinking was behind this decision. It is common knowledge that costs vary widely across the state and that Philadelphia, being a large urban center with a mandated minimum wage, sees costs that are much higher than other areas of the state. You might answer this with a response including the assumptions you published upon which rates were based. Just as an example, the assumption for the cost of training per staff person is so low as to be completely unrealistic. Given that one of the required trainings costs \$500, the approximately \$300 assumption is way off base. Recommendation would be for the removal of statewide rates and a more realistic rate-setting methodology implemented that would take into account the higher costs of service in urban centers. Current draft rates are insufficient for Philadelphia costs.

Thank you so much for your consideration.

Laura Princiotta
CEO
SpArc Philadelphia
2350 W. Westmoreland Street
Philadelphia, Pa 19140
215.229.4550 x124
lprinciotta@sparcphilly.org

RECEIVED
IRRC
2017 SEP 20 A 10:33

* SpArc Philadelphia



This electronic e-mail message, and any attachments transmitted with it, contains confidential information, intended only for the named addressee(s). If you are not the intended recipient, you are hereby notified that any use, distribution, copying or disclosure of this communication is prohibited. If you have received this e-mail in error, please immediately notify the sender by reply e-mail, and delete all copies of this communication from your computer and network.