

Adams-Moore, Denise

3160

14-540 #409

From: Sue McGill <sue@supportivebehavior.com>
Sent: Monday, September 18, 2017 1:39 PM
To: PW, ODPComment
Cc: par@par.net; karin@thealliancecsp.org; Francesco Tieri; Linda Tieri; sam@supportivebehavior.com
Subject: comments to the advance notice of final rulemaking on DOP 55 Pa. Code 6100.571
Attachments: comments to ODP_advance notice on final rule.doc

Please see the attached letter with comments from Supportive Behavioral Resources, Inc.

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September 18, 2017

Ms. Julie Mochon
Human Service Program Specialist Supervisor
Office of Development Programs/Department of Human Services
Room 502, Health & Welfare Building
625 Forster Street
Harrisburg, PA 17120

Re: comments on Advance Notice of Final Rulemaking
55 Pa Code 6100.571 (Fee Schedule Rate)

Dear Ms. Mochon:

Supportive Behavioral Resources provides a variety of services to those with Intellectual Disabilities in the Commonwealth and are grateful for the opportunity to provide comments and suggestions to the Advance Notice of Final Rulemaking that was published on August 19, 2017. We appreciate the department's willingness to be open to the suggestions and comments of the stakeholders to the PA ID system.

Our comments are as follows:

6100.571(b): It is our recommendation that the new regulations have a provision that includes a nationally recognized, market-based index that will be applied to the fee service rate that is used to determine annual rate increases. This is comparable to the rates that ICR/MR and nursing homes receive each year. In addition, as a provider in Philadelphia, there is a mandatory city wage tax and the city also has a minimum wage of \$12.10 per hour which is much higher than the state minimum wage.

6700.571(c)(6): To support the expenses that providers incur, SBR recommends that direct, indirect and administrative costs be identified and used in determining factors in the fee development.

6700.571(c)(8): In correlation with waiver definition of reasonable under the federal law, SBR recommends this citation state "reasonable and necessary costs".

Supports Intensity Scale and PA Plus

Use of the SIS scale impacts all of the supports that the individuals SBR provides services to each and every day, thus, we feel it is very important the standards applied in its



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implementation be applied consistently. We support the recommendations that PAR addressed in their comments dated September 8, 2017.

We would like to emphasize the following in the comments:

- The appeal process is integral to ensure that all individuals' receive the appropriate level of services that they need to give them an EveryDay Life. To do that is imperative that all identified parties receive the results of the assessment within 15 business days, have the ability to request a reconsideration of the initial assessment within 15 business days and if an appeal is made that the appeal is heard and a decision made within an agreed upon time frame (no more than 60 days).

We again thank the department for the opportunity to submit our comments/recommendations so that we can work together to strengthen the supports and services to ID community here in Pennsylvania.

Sincerely,

Francesco J. Tieri
CEO/Executive Director

Susan McGill
Compliance Officer