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The Arc of Pennsylvania is
affiliated with The Arc of the
United States and 34 local
chapters of The Arc across PA.

Ms. Julie Mochon
Human Services Program Specialist Supervisor
Office of Developmental 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 Rates)

Dear Ms. Mochon:

Thank you for the opportunity to comment on the Office of Developmental Programs (ODP) Advance Notice of Final Rulemaking that was published on August 19, 2017. The Arc of Pennsylvania is a statewide nonprofit organization that provides advocacy and resources for people with intellectual and developmental disabilities and their families. We have over 8,000 members and 33 local chapters. The Arc of Pennsylvania and its chapters are first and foremost advocates and we also provide services. Our perspective is unique in that we are led by people with disabilities and their families yet we know the challenges of providing services.

The Arc of Pennsylvania sincerely appreciates ODP's extensive efforts to solicit public comment on the most all-encompassing regulatory effort in its history. In our previous comments, we expressed our overall concern for the breadth and depth of the proposed regulations. As family members and providers, we saw the overabundance of regulatory requirements that we believe would negatively impact the people we serve. We felt encouraged by ODP's receptiveness to our concerns and we are very eager to see a more streamlined set of regulations that assure quality services without hamstringing those most interested in meeting the unique needs of each person we serve. In this light, we respectfully request ODP to issue an Advance Notice of the regulations prior to ODP's submission to the Independent Regulatory Review Commission.

Achieve with us.

Below are The Arc of Pennsylvania's recommendations for § 6100.571. Fee schedule rates.

§ 6100.571

We are pleased to see the additional language that recognizes the costs of benefits, training, recruitment and most importantly the service needs of the individual.

§ 6100.571 (b)

When rates are developed, The Arc of Pennsylvania requests that the Department share all the data indexes and reports used to develop rates. Full transparency of what tools were used will increase our assurance that the rates were developed based on valid data.

Many of our chapters provide only one area of service delivery, i.e. day supports or employment support. They are not in a position to offset any significant losses from other reimbursed services. The most frequent response from our chapters regarding this Advance Notice is their concern for refreshing rates "at least every 3 years". If a service is truly underfunded, the chapter would not be in a position to wait 3 years for resolution. They would be forced to stop providing services and critical family supports would no longer be available in whole areas of the state.

§ 6100.571 (c)(1)

We appreciate substituting "service" for "support".

The Arc of Pennsylvania thanks the Office of Developmental Programs again for the opportunity to provide comments on these proposals, and we look forward to continuing our efforts to improve the everyday lives of Pennsylvanians with disabilities.

Sincerely,



Maureen Cronin