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Form Letter D 11

14-240 (#435)

Adams-Moore, Denise

From: Eric DeMico <ericdemico@gmail.com>
Sent: Friday, September 22, 2017 8:57 PM
To: PW, ODPComent
Subject: Inflation-Adjustment to Reimbursement Rates
Attachments: TPA Comments Fee Schedule Rates_Advance Notice of Final Rulemaking 6100_571 2017 09 17.docx

I have attached a letter which represents what I believe to be the fair and appropriate way to adjust reimbursement rates going forward.

Thank you for your consideration to this matter.

Warm regards,

Eric

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Eric DeMico
724-433-8513

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IRRC
2017 SEP 26 P 3:50

3160

To: Julie Mochon, Policy Director
Office of Developmental Programs
Room 502, Health and Welfare Building
625 Forster Street
Harrisburg, PA 17120.
Electronic comments submitted to RA-odpcomment@pa.gov

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2017 SEP 26 P 3:50

From: Patrick DeMico, Executive Director
The Provider Alliance
2216 Longview Drive
Greensburg PA 15601

Subject: Comments to 47 Pa. Bulletin 4831, August 19, 2017 Public Notice

RE: Home and Community-Based Supports and Licensing; Fee Schedule Rates; Advance Notice of Final Rulemaking (Title 55 Chapter §6100.571, Fee Schedule Rates)

Date: September 17, 2017

Comment:

The Department must adopt in regulation a nationally recognized market index to adjust fee schedule rates annually.

Proposed Change:

As published,

(b) The Department will [refresh the market-based data used] examine and use the data sources set forth in subsection (a) to establish fee schedule rates at least every 3 years.

Proposed revision,

(b) The Department will [refresh the market-based data used] examine and use the data sources set forth in subsection (a) to establish fee schedule rates at least every 3 years, and will adjust rates annually thereafter within each three-year cycle, using a nationally recognized market index.

Reasoning and Support:

1. Historically, fee schedule rates supporting people with intellectual disability have not been adjusted following their inception. An appropriate index should be selected and published in advance of its application.
2. Current fee schedule rates do not support a living wage for Direct Support Professionals statewide.

3. Fee schedule rates that do not keep pace with inflation and other economic market forces effectively result in decreased quality and services to people with intellectual disability and autism.
4. Without fee schedule rates that support a living wage, reimburse 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.
5. Fee schedule rates that do not reflect adequate 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.

Patrick DeMico, Executive Director
The Provider Alliance

