

Financial Workgroup

January 5, 2022





Agenda

1. Review and Analysis of Proposed Rates
2. Bureau of Labor Statistics Data
3. Rate Assumptions
4. Discussion of Proposed Comments

NOTICES
DEPARTMENT OF
HUMAN SERVICES

Availability of the Proposed Rate Setting Methodology, Fee Schedule Rates and Department-Established Fees for Services Funded Through the Office of Developmental Programs' Consolidated, Community Living and Person/Family Directed Support Waivers and the Community Intellectual Disability Base-Funded Program and Availability of Proposed Amendments to the Community Living and Person/Family Directed Support Waivers

[52 Pa.B. 102]

[Saturday, January 1, 2022]

The Department of Human Services (Department) is making available for public review and comment the rate setting methodology used to develop the proposed Fee Schedule Rates for services funded through the Consolidated, Community Living and Person/Family Directed Support (P/FDS) Waivers and the Community Intellectual Disability Base-Funded Program and the proposed Department-Established Fees for residential ineligible services.

The proposed Fee Schedule Rates will be effective January 1, 2022, with the exception of the rates for direct Community Participation Support services. The temporary increases to the Fee Schedule Rates for direct Community Participation Support services published at 51 Pa.B. 1907 (April 3, 2021) will remain in effect until 6 months after the expiration of the Federal novel coronavirus (COVID-19) public health emergency. The proposed Department-Established Fees will be effective July 1, 2022.

The Department is also making available for public review and comment the proposed increases to the maximum available annual funding per individual for services in the Community Living and P/FDS Waivers to ensure that proposed changes to the Fee Schedule Rates do not result in a reduction or loss of waiver services.

Background

Under 55 Pa. Code § 6100.571 (relating to fee schedule rates), which was effective October 5, 2019, the Department is required to update the data used in establishing the fee schedule rates at least every 3 years. The Department has reviewed and revised its rates for services funded through the Consolidated, Community Living and P/FDS Waivers and the Community Intellectual Disability Base-Funded Program to comply with this requirement as well as to comply with the requirement in the Home and Community-Based Waiver Instructions, Technical Guide and Review Criteria to ensure at a minimum of every 5 years that rates are adequate to maintain an ample provider base and ensure quality of services.

Rate-Setting Methodology for Fee Schedule Rates and Department-Established Fees:

The proposed Fee Schedule Rates and Department-Established Fees were developed using a market-based approach. The process for the development of the Fee Schedule Rates and Department-Established Fees included a review of the waiver service definitions and a determination of allowable cost components which reflected costs that are reasonable, necessary and related to the service, as defined in the Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards (OMB Circular Uniform Guidance, December 26, 2014). The Department established the Fee Schedule Rates and Department-Established Fees to fund services at a level sufficient to ensure access, encourage provider participation, and promote provider choice, while at the same time ensuring cost effectiveness and fiscal accountability. The Fee Schedule Rates and Department-Established Fees represent the maximum rates that the Department will pay for each service.

In developing the proposed Fee Schedule Rates and Department-Established fees for each service, the Department evaluated and used various independent data sources, such as a Commonwealth-specific compensation study, to ensure the rates reflect the expected expenses for the delivery of the service under the Consolidated, Community Living and P/FDS Waivers.

HCBS Consolidated Waiver, Effective July 1, 2017

Appendix I: Financial Accountability

I-2: Rates, Billing and Claims

a. Rate Determination Methods.

*ODP evaluated and used various independent data sources such as a Pennsylvania-specific compensation study & data from prior approved cost reports, as applicable, and considers the expected expenses for the delivery of the services under the waivers for the major allowable cost categories listed below:

- The support needs of the participants
- Staff wages
- Staff-related expenses
- Productivity
- Occupancy
- Program expenses and administration-related expenses
- A review of approved service definitions in the waiver and determinations made about cost components that reflect costs necessary and related to the delivery of each service
- A review of the cost of implementing Federal, State and local statutes, regulations and ordinances.

In developing the proposed Fee Schedule Rates and Department-Established fees for each service, the Department evaluated and used various independent data sources, such as a Commonwealth-specific compensation study, to ensure the rates reflect the expected expenses for the delivery of the service under the Consolidated, Community Living and P/FDS Waivers.

As required by 55 Pa. Code § 6100.571(b), to establish the Fee Schedule Rates the Department examined and used data relating to the following factors:

- The service needs of the individuals.
- Staff wages.
- Staff-related expenses.
- Productivity.
- Occupancy.
- Program and administration-related expenses.
- Geographic costs based on the location where the service is provided.
- Proposed service definitions in the Consolidated, Community Living and P/FDS Waivers and determinations made about allowable cost components that reflect reasonable and necessary costs related to the delivery of each service.
 - Cost of implementing applicable Federal and State statutes and regulations and local ordinances.

§ 6100.571. Fee schedule rates.

(a) The Department will establish fee schedule rates, based on the factors in subsection (b), using a market-based approach so that payments are consistent with efficiency, economy and quality of care and sufficient to enlist enough providers so that services are available to at least the extent that such services are available to the general population in the geographic area.

(b) In establishing the fee schedule rates in subsection (a), the Department will examine and use data relating to the following factors:

- (1) The service needs of the individuals.
- (2) Staff wages, including education, experience, licensure requirements and certification requirements.
- (3) Staff-related expenses, including benefits, training, recruitment and supervision.
- (4) *Productivity*. Productivity is the amount of service delivered relative to the level of staffing provided.
- (5) *Occupancy*. Occupancy is the cost related to occupying a space, including rent, taxes, insurance, depreciation and amortization expenses.
- (6) Direct and indirect program and administration-related expenses.
- (7) Geographic costs based on the location where the HCBS is provided.
- (8) Federally-approved HCBS definitions in the waiver and determinations made about cost components that reflect reasonable and necessary costs related to the delivery of each HCBS.
- (9) The cost of implementing applicable Federal and State statutes and regulations and local ordinances.
- (10) Other factors that impact costs.

(c) The Department will update the data used in subsection (b) at least every 3 years.

(d) The Department will publish a description of its rate setting methodology used in subsection (a) as a notice in the *Pennsylvania Bulletin* for public review and comment. The description will include a discussion of the use of the factors in subsection (b) to establish the fee schedule rates; a discussion of the data and data sources used; and the fee schedule rates.

(e) The Department will make available to the public a summary of the public comments received in response to the notice in subsection (d) and the Department's response to the public comments.

As required by 55 Pa. Code § 6100.711(c) (relating to fee for the ineligible portion of residential service), to establish the Department-Established Fees the Department examined and used data relating to the following factors:

- Occupancy.
- Meals for staff persons.
- Custodial and maintenance expenses.
- Geographic costs based on the location where the service is provided.

Two Department-Established Fees were developed for each Residential Habilitation Ineligible service based on geographic costs based on the location where the service is provided.

The proposed Fee Schedule Rates and the proposed Department-Established Fees for each service are included in the following tables. The assumption logs used to develop the Fee Schedule Rates and Department-Established fees are available at <https://www.dhs.pa.gov/providers/Providers/Pages/2022-Proposed-Rates-for-Consolidated-Community-Living-PFDS-Waivers.aspx>.

A notice will be published announcing the final Fee Schedule Rates and Department-Established Fees after the public comment period.

Proposed Waiver Amendments

Whenever substantive changes are made to an approved waiver, the Department must submit an amendment to the Centers for Medicare & Medicaid Services (CMS) for approval. The Department proposes to increase the limits on the maximum dollar amount of waiver services in Appendix C-4 as follows effective January 1, 2022:

- The current limit of \$70,000 per person per fiscal year for Community Living Waiver services will be increased to \$85,000. Supports Coordination services will continue to be excluded from this limit.
- The current limit of \$33,000 per person per fiscal year for P/FDS Waiver services will be increased to \$41,000. Supports Coordination and Supports Broker services will continue to be excluded from this limit. The limit can continue to be exceeded by \$15,000 for Advanced Supported Employment or Supported Employment services.

The proposed increases will ensure that the proposed changes to the Fee Schedule Rates do not result in a reduction or loss of waiver services for individuals.

Fiscal Impact

It is anticipated that there will be a total cost to the Commonwealth in Fiscal Year (FY) 2021-2022 of \$190.636 million (\$81.196 million in State funds). For FY 2021-2022, the increased costs to the ID-Community Waiver Program are \$185.870 million (\$76.430 million in State funds) and an increase of \$4.766 million in State funds to the ID-Community Base Program.

In FY 2022-2023, the cost is \$395.640 million (\$201.890 million in State funds). ID-Community Waiver Program costs are \$385.749 million (\$191.999 million in State funds) and ID-Community Base Program costs are \$9.891 million in State funds.

For FY 2023-2024 and subsequent years, the cost is \$395.640 million (\$202.522 million in State funds). ID-Community Waiver Program costs are \$385.749 million (\$192.631 million in State funds) and ID-Community Base Program costs are \$9.891 million in State funds.

Fiscal Note: 14-NOT-1481. (1) General Fund;

(7) ID—Community Waiver Program; (2) Implementing Year 2021-22 is \$76,430,000; (3) 1st Succeeding Year 2022-23 is \$191,999,000; 2nd Succeeding Year 2023-24 through 5th Succeeding Year 2026-27 are \$192,631,000; (4) 2020-21 Program—\$1,622,000,000; 2019-20 Program—\$1,664,000,000; 2018-19 Program—\$1,644,000,000;

(7) ID—Community Base Program; (2) Implementing Year 2021-22 is \$4,766,000; 1st Succeeding Year 2022-23 through 5th Succeeding Year 2026-27 are \$9,891,000; (4) 2020-21 Program—\$144,432,000; 2019-20 Program—\$148,943,000; 2018-19 Prgram—\$149,379,000;

(8) recommends adoption. Funds have been included in the budget.

Public Comment

Interested persons are invited to submit written comments regarding the proposed rates and waiver amendments. Comments should be addressed to the Department of Human Services, Office of Developmental Programs, Division of Provider Assistance and Rate Setting, 4th Floor, Health and Welfare Building, 625 Forster Street, Harrisburg, PA 17120. Comments may also be submitted to the Department at ra-ratesetting@pa.gov using subject header "Proposed ID/A Rates."

Comments received within 30 days of publication of this notice will be reviewed and considered for revisions to the proposed rates and waiver amendments.



BLS Data Comparison

Occupation Code (SOC)	Occupational Title	Weighting
21-1015	Rehabilitation Counselors	14.10%
21-1093	Social and Human Service Assistants	14.10%
31-1011	Home Health Aides	14.10%
39-9021	Personal Care Aides	14.10%
11-9151	Social and Community Service Managers	4.23%
19-3031	Clinical, Counseling, and School Psychologists	4.23%
21-1023	Mental Health and Substance Abuse Workers	4.23%
29-1122	Occupational Therapists	4.23%
29-1123	Physical Therapists	4.23%
29-1127	Speech-Language Pathologists	4.23%
29-1141	Registered Nurses	4.23%
29-2061	Licensed Practical and Licensed Vocational Nurses	4.23%
37-2012	Maids and Housekeeping Cleaners	4.23%
43-3031	Bookkeeping, Accounting, and Auditing Clerks	4.23%
53-6099	Other Transportation Worker	1.30%
		100.00%



BLS Data Comparison

Occupation	Occupational Title	
Code (SOC)		Weighting
21-1015	Rehabilitation Counselors	14.10%
21-1093	Social and Human Service Assistants	14.10%
31-1011	Home Health Aides	14.10%
39-9021	Personal Care Aides	14.10%



BLS Data Comparison

Occupation	Occupational Title		Pennsylvania Statewide Data	
Code (SOC)		Weighting	BLS May 2015	BLS May 2020
21-1015	Rehabilitation Counselors	14.10%	\$ 18.56	\$ 20.52
21-1093	Social and Human Service Assistants	14.10%	\$ 14.75	\$ 17.09
31-1011	Home Health Aides	14.10%	\$ 10.58	\$ 12.75
39-9021	Personal Care Aides	14.10%	\$ 10.65	\$ 12.75



BLS Data Comparison

Occupation	Occupational Title		Pennsylvania Statewide Data			
Code (SOC)		Weighting	BLS May 2015	BLS May 2020	Pct. Increase	Average
21-1015	Rehabilitation Counselors	14.10%	\$ 18.56	\$ 20.52	10.56%	16.66%
21-1093	Social and Human Service Assistants	14.10%	\$ 14.75	\$ 17.09	15.86%	
31-1011	Home Health Aides	14.10%	\$ 10.58	\$ 12.75	20.51%	
39-9021	Personal Care Aides	14.10%	\$ 10.65	\$ 12.75	19.72%	



BLS Data Comparison

Occupation	Occupational Title		Pennsylvania Statewide Data			
Code (SOC)		Weighting	BLS May 2015	BLS May 2020	Pct. Increase	Average
21-1015	Rehabilitation Counselors	14.10%	\$ 18.56	\$ 20.52	10.56%	16.66%
21-1093	Social and Human Service Assistants	14.10%	\$ 14.75	\$ 17.09	15.86%	
31-1011	Home Health Aides	14.10%	\$ 10.58	\$ 12.75	20.51%	
39-9021	Personal Care Aides	14.10%	\$ 10.65	\$ 12.75	19.72%	
31-1013	Psychiatric Aides	100.00%	\$ 15.66	\$ 17.75	13.35%	15.17%
39-1021	First-Line Supervisors of Personal Service Workers	100.00%	\$ 17.88	\$ 20.92	17.00%	

American Rescue Plan

FUNDING RATE INCREASES TO SUPPORT PEOPLE WITH INTELLECTUAL DISABILITY & AUTISM (ID/A)

Invest \$541M into Fee Schedule Rates to fund Direct Support Professionals (DSPs) wages which would establish equal pay for equal work with PA state centers.

The current average wage for a Residential Services Aide (comparable to a community DSP) at the PA state centers is \$18.66/hour. The most recently published Pennsylvania DSP compensation studies reported the average wages for DSPs between \$13.20/hour and \$14.22/hour. Turnover and vacancy rates are 2-3 times higher in community programs than in state centers.

July 2, 2021

The Honorable Tom Wolf
Governor of the Commonwealth of Pennsylvania
508 Main Capitol Building
Harrisburg PA 17120

Dear Governor Wolf,

We have submitted our recommendations of 2021 and would like to see a living wage for all Direct Support rates. We ask for your support.

The key points include:

1. Increasing fee investment of
2. Funding sign-on
3. Incentivizing the ongoing costs.
4. Expanding the

Our letter to Secretary recommendations.

Thank you for your support of people with disabilities.

Sincerely,

Patrick DeMico

Patrick DeMico

cc: Meg Snead, Secretary, Department of Human Services
Kristin Ahrens, Deputy Secretary, DHS, Office of Developmental Programs

The key points included in our recommendations are as follows:

1. Increasing fee schedule rates to support a living wage of \$18.20 per hour for DSP's with an investment of \$541 million.
2. Funding sign-on and retention bonuses for an immediate impact on workforce vacancies.
3. Incentivizing the use of remote supports and assistive technologies and funding for their ongoing costs.
4. Expanding the proposed student loan forgiveness programs to ID/A DSPs.

Our letter to Secretary Snead is included and contains the complete details behind our recommendations.

American Rescue Plan

EQUAL PAY FOR EQUAL WORK

INCREASE DSP WAGES FOR COMMUNITY INTELLECTUAL DISABILITY AND AUTISM (ID/A) SERVICES

Pennsylvania Pays its own workers in the State Centers providing ID/A services \$4.28/hour or 30% MORE THAN Community DSPs.

Workforce Comparisons from Current Data	Residential Services Aides, PA State Centers (June 2021)	Community Direct Support Professionals (July 2021)	Variance
Average Hourly Wage	\$18.66	\$14.38	\$(4.28)
Vacancy Factor	16.8%	23.3%	1.4X Higher
Turnover Rate	13.9%	37.8%	2.7X Higher

- 6,500 Pennsylvanians with ID/A have lost Day Services during the pandemic and have not returned due to the current staffing crisis.
- This represents a 30% Decrease in service capacity.



Equal Pay For Equal Work

Number of Positions/Hours				
	DSPs	Percentage	Hrs/Yr	Total Hrs
Full-Time	44,000	80%	2,080	91,520,000
Part-Time	11,000	20%	1,040	11,440,000
Total	55,000	100%		102,960,000

Living Wage	\$	18.66	
Average DSP Wage	\$	14.38	
Hourly Wage Increase	\$	4.28	
DSP Hours - Statewide		102,960,000	
Additional Wage Cost	\$	440,668,800	
Benefit Cost/ERE	\$	66,100,320	
Overtime Cost (Net)	\$	44,066,880	
Total Cost			\$550,836,000

American Rescue Plan

EQUAL PAY FOR EQUAL WORK

THE GAP IN PAY WIDENS BETWEEN STATE CENTER RESIDENT AIDES & COMMUNITY DSPS

Workforce Comparisons from Current Care	Residential Services	Community Direct	Variance
Average Hourly Wage	\$18.66	\$14.38	\$(4.28)
Vacancy Rate	6.8%	11.1%	4.3% Higher
Turnover Rate	13.9%	37.8%	2.7X Higher

- Average Wage at State Centers will Increase to Over \$19/HR.
- The Pay Gap is Growing while Community Services are Collapsing.
- Over 6,500 People Have Lost Vital Day Services and Cannot Return Due To Lack of DSPs to Provide Care.
- We need \$541 million **PLUS** to close this gap.

State Center Collective Bargaining Agreement Details



Current Four-Year Contract 2019-2023

Annual Increases

July 1, 2019	3.0%
October 1, 2020	2.0%
October 1, 2021	2.5%
October 1, 2022	2.5%

Step Raises (PA Pay Scale: Range from 1.9 – 2.2%)

April 20, 2020

April 20, 2021

First Full Pay Period January 2023



SHOW YOUR SUPPORT

We need YOUR Help to facilitate change.

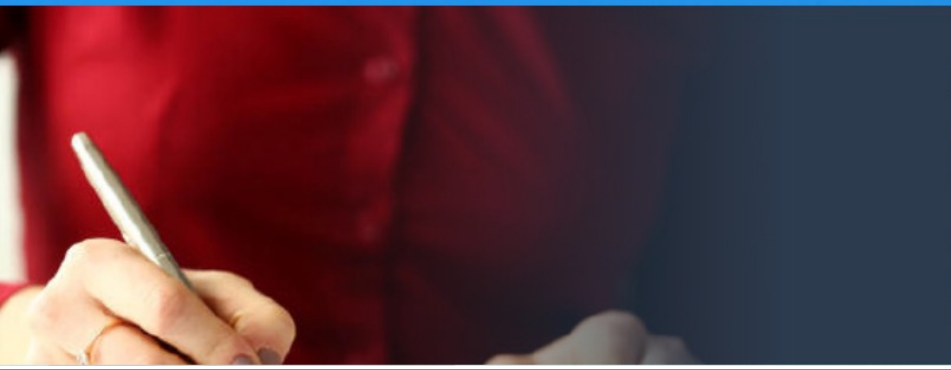
Current Pennsylvania regulation permits rates to remain stagnant for years. Legislative action is required to correct this problem.

The Governor must request and the legislature must approve a budget that includes sufficient investment into rates to pay DSPs at the same level as state workers performing the same duties.

 **TAKE ACTION NOW!!**

Further action is needed to provide an annual Cost of Living Adjustment (COLA) through a market index, as defined in House Bill 92, to ensure that DSP wages can keep pace with inflation and remain competitive in the labor market for the essential services they provide.

 **SIGN OUR PETITION**



ADVOCACY TOOL KIT

We've designed an Advocacy Toolkit to be a central resource for our community to Stand Up for Disability Caregivers.

Now, more than ever, we have an opportunity to create real and sustained system change to improve care and support for some of Pennsylvania's most vulnerable citizens

ACTION CENTER

Urge PA Leaders to Support Equal Pay for Equal Work for Community Direct Support Professionals

American Rescue Plan
EQUAL PAY FOR EQUAL WORK

INCREASE DSP WAGES FOR COMMUNITY INTELLECTUAL DISABILITY AND AUTISM (ID/A) SERVICES

Pennsylvania Pays its own workers in the State Centers providing ID/A services \$4.28/hour or 30% MORE THAN Community DSPs.

Workforce Comparisons from Current Data	Residential Services Aides, PA State Centers (June 2021)	Community Direct Support Professionals (July 2021)	Variance
Average Hourly Wage	\$18.66	\$14.38	\$(4.28)
Vacancy Factor	16.8%	23.3%	1.4X Higher
Turnover Rate	13.9%	37.8%	2.7X Higher

- 6,500 Pennsylvanians with ID/A have lost Day Services during the pandemic and have not returned due to the current staffing crisis.
- This represents a 30% Decrease in service capacity.
- The community ID/A system is collapsing, and investment is needed immediately to compensate community DSPs at the same level as their state-worker counterparts.
- \$541 million is needed to close this gap.
- Funds are available NOW from the American Rescue Plan.

PLEASE ACT TODAY!

“I rely on staff for pretty much my total care, because I can't dress myself, I can't get myself up, I use a Hoyer lift and all that stuff. And without my DSPs, I wouldn't be able to go out like everyone else...I even have to plan my daily bathroom needs around when staff are available, which of course doesn't make my medical professionals happy, because it makes me sick, and I can't do what I need to do to live.”

— Person Served with an ID



Compose Your Message

- Governor
- State Senator
- State Representative

Subject

Release Rainy Day Funds to Increase DSP Com

Message Body

Please add your own story about this issue to personalize your message

Under our Equal Pay for Equal Work campaign, Direct Support Professionals (DSPs) supporting 58,000 people with intellectual disabilities and autism (ID/A) across the state SHOULD NOT earn 30%

Enter Your Info

Your Information

Prefix * First Name * Last Name *

Email *

Home Information

Street Address *

ZIP Code * Enter Zip for City and State

- Send me email alerts
- Remember me

Send Message

Urge PA Leaders to Support Equal Pay for Equal Work for Community Direct Support Professionals

Under our Equal Pay for Equal Work campaign, Direct Support Professionals (DSPs) supporting 58,000 people with intellectual disabilities and autism (ID/A) across the state SHOULD NOT earn 30% less than their counterparts in the PA-owned and operated State Centers. The amount of funding needed to close this gap is \$541 million. A significant portion of ARPA funding has been sheltered in the Rainy-Day Fund for future needs.

The severity of the workforce crisis is jeopardizing the community ID/A system. Given the availability of funding from ARPA and the potential Medicaid increases under the Build Back Better Framework, please invest \$541 million into the fee schedule rates so that people with ID/A and their families can retain much-needed services. Your support is urgently needed to preserve the community system of care for people with ID/A across Pennsylvania. Thank you.

Proposed Rates

Residential Habilitation



Residential Hab NG1	Current	Proposed	Increase	Average
1P with Day	\$ 392.42	\$ 408.54	4.11%	5.51%
1P without Day	\$ 488.16	\$ 523.00	7.14%	
2P with Day	\$ 392.42	\$ 408.54	4.11%	
2P without Day	\$ 488.16	\$ 523.00	7.14%	
3P with Day	\$ 283.48	\$ 294.49	3.88%	
3P without Day	\$ 362.28	\$ 387.76	7.03%	
4P with Day	\$ 222.86	\$ 232.07	4.13%	
4 P without Day	\$ 283.94	\$ 304.14	7.11%	
1-5P with Day	\$ 204.55	\$ 212.03	3.66%	
1-5P without Day	\$ 250.13	\$ 267.15	6.80%	

Residential Hab NG2	Current	Proposed	Increase	Average
1P with Day	\$ 474.34	\$ 515.01	8.57%	9.52%
1P without Day	\$ 548.26	\$ 606.92	10.70%	
2P with Day	\$ 474.34	\$ 515.01	8.57%	
2P without Day	\$ 548.26	\$ 606.92	10.70%	
3P with Day	\$ 317.41	\$ 341.21	7.50%	
3P without Day	\$ 399.23	\$ 441.87	10.68%	
4P with Day	\$ 251.52	\$ 268.22	6.64%	
4 P without Day	\$ 313.60	\$ 347.00	10.65%	
1-5P with Day	\$ 226.72	\$ 250.71	10.58%	
1-5P without Day	\$ 282.01	\$ 311.99	10.63%	

Proposed Rates

Residential Habilitation



Residential Hab NG3	Current	Proposed	Increase	Average
1P with Day	\$ 685.74	\$ 746.22	8.82%	9.38%
1P without Day	\$ 838.54	\$ 924.89	10.30%	
2P with Day	\$ 581.02	\$ 630.70	8.55%	
2P without Day	\$ 621.80	\$ 685.68	10.27%	
3P with Day	\$ 408.92	\$ 440.90	7.82%	
3P without Day	\$ 466.30	\$ 514.20	10.27%	
4P with Day	\$ 319.22	\$ 341.91	7.11%	
4 P without Day	\$ 364.15	\$ 401.47	10.25%	
1-5P with Day	\$ 285.32	\$ 314.42	10.20%	
1-5P without Day	\$ 326.81	\$ 360.24	10.23%	

Residential Hab NG4	Current	Proposed	Increase	Average
1P with Day	\$ 759.68	\$ 822.23	8.23%	8.75%
1P without Day	\$ 1,021.19	\$ 1,118.74	9.55%	
2P with Day	\$ 638.49	\$ 689.49	7.99%	
2P without Day	\$ 748.70	\$ 820.15	9.54%	
3P with Day	\$ 450.93	\$ 484.03	7.34%	
3P without Day	\$ 570.30	\$ 624.74	9.55%	
4P with Day	\$ 352.46	\$ 376.12	6.71%	
4 P without Day	\$ 439.74	\$ 481.66	9.53%	
1-5P with Day	\$ 309.17	\$ 338.58	9.51%	
1-5P without Day	\$ 391.70	\$ 429.04	9.53%	

Community Participation Support Services



Community Participation	Current	Proposed	Increase	Average
CPS Community 1:2 to 1:3	\$ 5.36	\$ 5.85	9.14%	15.23%
CPS Community 2:3	\$ 8.01	\$ 8.99	12.23%	
CPS Community 2:1	\$ 18.94	\$ 22.58	19.22%	
CPS Community 1:1	\$ 9.84	\$ 11.84	20.33%	

Community Participation	Current	Proposed	Increase	Average
CPS Facility 1:11 to 1:15	\$ 2.27	\$ 2.38	4.85%	2.80%
CPS Facility 1:7 to 1:10	\$ 2.44	\$ 2.49	2.05%	
CPS Facility 1:2 to 1:3	\$ 5.26	\$ 5.33	1.33%	
CPS Facility 1:4 to 1:6	\$ 4.01	\$ 4.13	2.99%	

Supported Living & In-Home and Community



Supported Living NG1	Current	Proposed	Increase	Average
1 Person	\$ 133.10	\$ 151.12	13.54%	13.54%
2 Person	\$ 93.17	\$ 105.79	13.55%	
3 Person	\$ 66.55	\$ 75.56	13.54%	
Supported Living NG2	Current	Proposed	Increase	Average
1 Person	\$ 208.26	\$ 253.26	21.61%	21.45%
2 Person	\$ 166.61	\$ 202.61	21.61%	
3 Person	\$ 110.79	\$ 134.19	21.12%	
Supported Living NG3	Current	Proposed	Increase	Average
1 Person	\$ 341.36	\$ 404.38	18.46%	18.44%
2 Person	\$ 286.40	\$ 338.62	18.23%	
3 Person	\$ 198.17	\$ 235.07	18.62%	
Supported Living NG4	Current	Proposed	Increase	Average
1 Person	\$ 428.58	\$ 543.72	26.87%	26.73%
2 Person	\$ 428.58	\$ 543.72	26.87%	
3 Person	\$ 299.32	\$ 378.48	26.45%	
In Home and Community	Current	Proposed	Increase	Average
In-Home and Community 1:3	\$ 3.17	\$ 4.09	29.02%	27.89%
In-Home and Community 1:2	\$ 4.52	\$ 5.76	27.43%	
In-Home and Community 1:1	\$ 8.08	\$ 10.28	27.23%	



Service Mix

	% Increase	% Revenue	Weighted %
Residential Habilitation	8.29%	100%	8.29%
CPS Community	15.23%	0%	0.00%
CPS Facility	2.80%	0%	0.00%
Supported Living	20.40%	0%	0.00%
In Home and Community	27.89%	0%	0.00%
			8.29%

	% Increase	% Revenue	Weighted %
Residential Habilitation	8.29%	20%	1.66%
CPS Community	15.23%	20%	3.05%
CPS Facility	2.80%	20%	0.56%
Supported Living	20.40%	20%	4.08%
In Home and Community	27.89%	20%	5.58%
			14.92%

	% Increase	% Revenue	Weighted %
Residential Habilitation	8.29%	0%	0.00%
CPS Community	15.23%	50%	7.62%
CPS Facility	2.80%	0%	0.00%
Supported Living	20.40%	0%	0.00%
In Home and Community	27.89%	50%	13.95%
			21.56%

Summary of Fee Assumptions, FY 2021–2022

Intellectual Disability/Autism (IDA) Fee Development

Pennsylvania Office of Developmental Programs

Allowable Cost Components	Residential Habilitation – Group Homes		Residential Habilitation – Supported Independent Living
	Licensed	Unlicensed	
Procedure Codes and Units of Service	Day	Day	Day
Wages and Employee Related Expenses(ERE)¹			
Direct Care Wages (Per Hour) ²	\$14.78–\$21.34 (DSP - High School Diploma) \$17.31–\$26.20 (DSP - Associate's Degree) \$19.61–\$36.20 (DSP - Bachelor's Degree)	\$14.78–\$21.34 (DSP - High School Diploma) \$17.31–\$26.20 (DSP - Associate's Degree) \$19.61–\$36.20 (DSP - Bachelor's Degree)	\$17.46–\$28.26
Other Program Staff Wages (Per Hour) ³	\$26.02–\$40.70 (Supervisor) \$32.16–\$40.70 (Residential Manager, Program Specialist, Staff Trainer) \$25.80–\$41.44 (Nurse and Other Practitioners)	\$26.02–\$40.70 (Supervisor) \$32.16–\$40.70 (Residential Manager, Staff Trainer) \$25.80–\$41.44 (Nurse and Other Practitioners)	\$26.02–\$40.70 (Supervisor) \$32.16–\$40.70 (Supported Living Specialist)

¹ Direct care wages and other program staff wages are increased by 29% for the Enhanced Communication Statewide Fee (U1 modifier) fees.

² Wages for direct care staff reflect an adjustment for overtime by applying a 5% increase for full time employees below an annual salary of \$35,568.

³ Wages for non-direct support professional staff are all above an annual salary of \$35,568. Overtime adjustments do not apply to these staff.

Allowable Cost Components	Residential Habilitation – Group Homes		Residential Habilitation – Supported Independent Living
	Licensed	Unlicensed	
Direct Care Staffing Ratio	N/A	N/A	Based on service definitions
Other Program Staff Staffing Ratio	1:20 (Program Specialist)	N/A	1:30 (Support Living Specialist)
Direct Care to Supervisor Staffing Ratio	N/A	N/A	1:6 (Supervisor)
ERE (Percent of compensation)	\$571.29 Health (per month) 2.3% Retirement 0.1% Life 0.2% Short Term Disability (STD) 0.1% Long Term Disability (LTD) \$410.90 Federal Unemployment Tax Act/State Unemployment Tax Act (FUTA/SUTA) per year 7.65% FICA 5.5% Workers Compensation	\$571.29 Health (per month) 2.3% Retirement 0.1% Life 0.2% STD 0.1% LTD \$410.90 FUTA/SUTA per year 7.65% FICA 5.5% Workers Compensation	\$571.29 Health (per month) 2.3% Retirement 0.1% Life 0.2% STD 0.1% LTD \$410.90 FUTA/SUTA per year 7.65% FICA 5.5% Workers Compensation
Paid Time Off (PTO) <i>PTO for full-time (FT) employees only</i>	10–25 days PTO bank (FT only) + 7 training days + 11 federal holidays (FT only) + 1 new hire training days per 24.0% of staff	10–25 days PTO bank (FT only) + 7 training days + 11 federal holidays (FT only) + 1 new hire training days per 24.0% of staff	10–25 days PTO bank (FT only) + 7 training days + 11 federal holidays (FT only) + 1 new hire training days per 24.0% of staff
Other Indirect Assumptions			
FT/Part Time (PT) Split	75% FT/25% PT	75% FT/25% PT	75% FT/25% PT
Vacancy Factor	97%	97%	N/A
Productivity <i>Billable hours per day</i>	N/A	N/A	7 hours per 8 hour day
Absentee Factor	N/A	N/A	5.0%
Transportation, Supply, and Employee Training Costs ⁴	4.4%	4.4%	4.4%
Other Staff Equipment Costs	N/A	N/A	\$1,000 per employee per 3 years

⁴ The transportation cost component includes consideration for both staff travel time and participant transportation. Staff travel time may not be billed by the provider as a discrete unit of this service. Fee ranges include consideration for mileage costs and non-billable travel time.

Allowable Cost Components	Residential Habilitation – Group Homes		Residential Habilitation – Supported Independent Living
	Licensed	Unlicensed	
Stipend	N/A	N/A	N/A
Administration Percentage	10.0%	10.0%	10.0%
Fee Variations	<ul style="list-style-type: none"> • SIS Group • Approved Program Capacity • With and Without Day Activities 	<ul style="list-style-type: none"> • Home Size 	<ul style="list-style-type: none"> • SIS Group • Home Size

Non-Residential Services (Excluding PDS)

Summary of Fee Assumptions, FY 2021–2022

Intellectual Disability/Autism (ID/A) Waiver Fee Development

Pennsylvania Office of Developmental Programs

Allowable Cost Components	Community Participation Support		
	Community	Facility	On-Call and Remote Support
Procedure Codes and Units of Service	15 minutes Procedure Codes: W5996, W5997 TD/TE, W5993, W5994 TD/TE, W9351, W9352	15 minutes Procedure Codes: W7222, W7223, W7224, W7226, W7244, W7269, W9353 TD/TE, W9356 TD/TE	15 minutes Procedure Codes: W9400
Wages and Employee Related Expenses(ERE)¹			
Direct Care Wages (Per Hour) ²	\$15.00–\$21.86	\$15.00–\$21.86	\$15.00–\$21.86
Enhanced Direct Care Wages (Per Hour)	\$23.54–\$33.23	\$23.54–\$33.23	\$23.54–\$33.23
Other Program Staff Wages (Per Hour) ³	\$23.49–\$35.69 (Supervisor, Program Specialist) \$40.44–\$40.44 (Director)	\$23.49–\$35.69 (Supervisor, Program Specialist) \$40.44–\$40.44 (Director)	\$23.49–\$35.69 (Supervisor, Program Specialist) \$40.44–\$40.44 (Director)
Direct Care Staffing Ratio	Based on service definitions	Based on service definitions	1:15 to 1:20

¹ Direct care wages and other program staff wages are increased by 29% for the Enhanced Communication Statewide Fee (U1 modifier) fees.

² Wages for direct care staff reflect an adjustment for overtime by applying a 5% increase for full time employees below an annual salary of \$35,568.

³ Wages for supervisors and directors are all above an annual salary of \$35,568. Overtime adjustments do not apply to these staff.

Allowable Cost Components	Community Participation Support		
	Community	Facility	On-Call and Remote Support
Other Program Staff Staffing Ratio	1:6 (Supervisor) 1:25 (Program Specialist) 1:150 (Director)	1:6 (Supervisor) 1:25 (Program Specialist) 1:150 (Director)	1:6 (Supervisor) 1:25 (Program Specialist) 1:150 (Director)
ERE (Percent of compensation)	\$571.29 Health (per month) 2.3% Retirement 0.1% Life 0.2% Short-Term Disability (STD) 0.1% Long-Term Disability (LTD) \$410.90 Federal Unemployment Tax Act (FUTA/SUTA) per year 7.65% FICA 5.5% Workers Compensation	\$571.29 Health (per month) 2.3% Retirement 0.1% Life 0.2% STD 0.1% LTD \$410.90 FUTA/SUTA per year 7.65% FICA 1.2% Workers Compensation	\$571.29 Health (per month) 2.3% Retirement 0.1% Life 0.2% STD 0.1% LTD \$410.90 FUTA/SUTA per year 7.65% FICA 1.2% Workers Compensation
Paid Time Off (PTO)	10–25 days PTO bank (Full Time [FT] only) + 10 training days + 11 federal holidays (FT only) + 3 new hire training days per 24.0% of staff	10–25 days PTO bank (FT only) + 10 training days + 11 federal holidays (FT only) + 3 new hire training days per 24.0% of staff	10–25 days PTO bank (FT only) + 10 training days + 11 federal holidays (FT only) + 3 new hire training days per 24.0% of staff
Other Indirect Assumptions			
FT/Part Time (PT) Split	75% FT/25% PT	75% FT/25% PT	75% FT/25% PT
Productivity <i>Billable hours per day</i>	6 hours (per 7 hour day)	6 hours (per 7 hour day)	7.5 hours
Absentee Factor	A flat 0% for staffing ratios of 1:1 and above, and ranged from 5%–15% for staffing ratios below 1:1 (e.g., 1:4)	A flat 5% for staffing ratios of 1:1 and above, and ranged from 5%–15% for staffing ratios below 1:1 (e.g., 1:4)	0%
Transportation ⁴	\$7,500 per year for three individuals	\$7,500 per year for three individuals	N/A
Occupancy Costs	N/A	60–70 sq ft Sq ft Cost \$5.72–\$16.00	N/A

⁴ The transportation cost component includes consideration for both staff travel time and participant transportation. Staff travel time may not be billed by the provider as a discrete unit of this service. Fee ranges include consideration for mileage costs and non-billable travel time.

Allowable Cost Components	Community Participation Support		
	Community	Facility	On-Call and Remote Support
Food	N/A	N/A	N/A
Supply Costs	\$1.00 per individual per day	\$1.00 per individual per day	N/A
Employee Training Costs	\$375 per employee per year (including \$225 for certification)	\$375 per employee per year (including \$225 for certification)	\$375 per employee per year (including \$225 for certification)
Administration Percentage	10%	10%	10%
Unit Multiplier	N/A	N/A	N/A

Proposed Comment Guidelines & Themes



1. Transparency
2. Facts
3. Impact



Proposed Comment Content

1. Equal Pay For Equal Work
2. BLS Data
3. Insufficiency of Investment
4. Quantify Financial Impact
5. Specific Request Supported by Data

The Case for Urgency: The Time is Now



1. Comments are due January 31, 2022
2. Governor's Proposed Budget will be released February 8
3. Further Increases are unlikely Following Publication of Governor's Proposed Budget
4. Under Current Regulation the Next Required Fee Schedule Update will be **January 1, 2025**



Questions & Discussion





Thank You!

COMMENTS ARE DUE JANUARY 31!