

**Executive Summary**  
**Proposed Fee Schedule Rates**  
**for Intellectual Disability and Adult Autism Waiver Services**

In response to proposed rates for Intellectual Disability and Autism Services (ID/A) published in the Pennsylvania Bulletin on January 1, 2022 from The Department of Human Services (DHS), The Provider Alliance (TPA) submitted its [comment letter](#) on January 18, 2022. Key arguments are summarized as follows:

There is no Standard Occupational Classification (SOC) code for Direct Support Professionals (DSPs) within the U.S. Department of Labor, Bureau of Labor Statistics (BLS). Therefore, DHS uses a combination of other SOC codes in its rate-setting methodology. Had DHS consistently applied its methodology from prior rate development, wage growth captured in fee schedule rates would be 18.2%.

Occupation Code (SOC)	Occupational Title	Published BLS Data			Pct. Increase	Average
		May 2015	May 2020			
21-1015	Rehabilitation Counselors	\$ 18.56	\$ 20.52	10.56%	18.20%	
21-1093	Social and Human Service Assistants	\$ 14.75	\$ 17.09	15.86%		
31-1011	Home Health Aides	\$ 10.58	\$ 12.75	20.51%		
39-9021	Personal Care Aides	\$ 10.65	\$ 12.75	19.72%		
39-9041	Residential Advisors	\$ 12.54	\$ 15.59	24.32%		

**Note: Including benefit and overtime costs based solely on the additional wages, this factor becomes 22.13%**

Pennsylvania regulation and provisions stipulated within Home and Community Based Services (HCBS) Medicaid waivers require a market-based approach that should include trending beyond the most recently published BLS data from May 2020, as well as future cost projections.

Occupation Code (SOC)	Occupational Title	Published BLS Data			BLS + CPI-U	Pct. Increase	Avg. Increase
		May 2015	May 2020	Dec 2021			
21-1015	Rehabilitation Counselors	\$ 18.56	\$ 20.52	\$ 22.31	20.22%	28.53%	
21-1093	Social and Human Service Assistants	\$ 14.75	\$ 17.09	\$ 18.58	25.99%		
31-1011	Home Health Aides	\$ 10.58	\$ 12.75	\$ 13.86	31.04%		
39-9021	Personal Care Aides	\$ 10.65	\$ 12.75	\$ 13.86	30.18%		
39-9041	Residential Advisors	\$ 12.54	\$ 15.59	\$ 16.95	35.19%		

**Note: Including benefit and overtime costs based solely on the additional wages, this factor becomes 34.7%.**

Converting data from table 1 above into the percentage fee increase to fund compensation, a minimum rate increase of 15.43% is needed. DHS has invested only 10.5% into the fee schedule, which has not been increased since 2017. **This difference represents an additional shortfall of over \$184 million.**

- DSP-equivalent positions at Pennsylvania State Centers earn on average \$18.66 per hour versus \$14.38 paid to community DSPs, a difference of 30%. State Center workers were guaranteed seven pay raises over the four-year period spanning 2019-2023.
- Community ID/A services averaged a 27% staff vacancy factor and 40-60% turnover rates based on provider survey results from September 2021.
- The TPA Equal Pay for Equal Work campaign has consistently requested a total investment of \$541 million into ID/A fee schedule rates to establish parity with the average wage at PA State Centers.
- TPA supports the application of a nationally-recognized annually-applied market index, as reflected in PA House Bill 92.

**Given the \$405 million proposed investment into the recently enacted fee schedule, another \$136 million is needed to achieve Equal Pay for Equal Work. At anticipated federal matching levels for fiscal year 2022-23, this would require an additional \$65 million in state dollars.**