



RCPA Comment Consolidated, Community Living, and P/FDS Waiver November 15, 2021  
Julie Mochon, Office of Developmental Programs

Dear Julie,

Please find comments from RCPA regarding the waiver renewal on the attached document. Additionally we would like to share the thoughts below.

We recommend that the eligibility age for the Adult Autism Waiver to be lowered to age 18. Currently, there is a gap in support at a crucial time for effective planning for individuals in the age bracket of 18-21. For many of these individuals, IBHS does not effectively meet their transition-age needs, whereas niched services under the Adult Autism Waiver would better prepare them for adulthood.

The proposed rates for CPS remote services ratios should align with the ratios that providers currently use for facility based services. Adding so many additional ratios that are different moves us closer to the complex situation that we would like to avoid. The current method of ISP planning that requires teams to determine how many units of service are needed in various billing codes is already too difficult. Individuals lives are not always predictable (just like many others) and it is time consuming and inefficient to require team meetings and critical revisions to ISPs to move units of service around. The units of service should be more fluid and allow for changes as necessary without a cumbersome process.

Rates should cover ALL non-direct duties that are required by regulation and policy (and continue to increase over time). Attendance at ISP meetings, SIS assessments, documentation of service, etc. The alternative is to allow these activities to be considered billable services upfront.

The cap for P/FDS waiver services needs to be increased, or eliminated and replaced with Community Living waiver for all participants.

As all waiver services are reviewed and policy decisions are made within the Office of Developmental programs, we ask that an ongoing evaluation of redundancies within the office is kept in mind, and efficiencies are implemented whenever possible. Some specific areas of concern include:

- Repetitive areas within the ISP document
- Annual recertification of life long disabilities (i.e. Down's syndrome, autism, etc.)
- Repetitive monitoring – IM4Q, QA&I, SCO monitoring, provider qualifications/recertification, licensing... much overlap that could be consolidated
- Align abuse definitions with OLTL, Child Protective Services. APS and ODP
- OLTL and ODP should align requirements for similar services – service definitions, rates and requirements for providers.

Additionally, we agree with the recommendations to add justice related services made through the Autism Connection of Pa. Adding Justice Related Case Management, Justice Related Assistive

Technology, and Justice Related Companion services to the waivers will add necessary services to support individuals with these needs in Pa.

Thank you for the opportunity to share our thoughts with you in the development of services in Pa.

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