

October 13, 2021

Dr. Meena Seshamani, M.D., Ph.D.
Department of Health & Human Services
Centers for Medicare and Medicaid Services
7500 Security Boulevard
Baltimore MD 21244-1850

Subject: American Rescue Plan Act Section 9817 – Proposed Pennsylvania Spending Plan

Dear Dr. Seshamani,

The Provider Alliance represents over 100 organizations and tens of thousands of people with disabilities and their caregivers across Pennsylvania. We have steadfastly supported investment of American Rescue Plan Act (ARPA) dollars into the fee schedule rates that fund services for people with Intellectual Disabilities and Autism (ID/A) to address our critical workforce crisis by increasing the compensation of Direct Support Professionals (DSPs) statewide.

As you know, the COVID-19 pandemic has significantly shifted the landscape of service delivery and accelerated the shortage of direct support professionals, or DSPs, the frontline workers who support people with intellectual and developmental disabilities (I/DD) to be included in the community. The new pressures and hazards of providing essential, close-contact services during the pandemic have exacerbated the existing workforce crisis. While many in the private sector pivoted by offering increased wages and hazard pay, community providers, who rely almost exclusively on Medicaid funding and are thus obliged to paying wages that Medicaid reimbursement rates will allow, have lacked the resources to fund these kinds of unanticipated costs.

Continuing delays in the implementation of the Pennsylvania proposal are causing Pennsylvania's ID/A providers to fall even further behind the private sector and are jeopardizing the care and services to thousands of people with ID/D.

Currently, the community ID/A system in Pennsylvania is collapsing:

- Providers are turning away new referrals due to insufficient staffing
- Providers are discontinuing programs and services due to insufficient staffing
- Providers are struggling to achieve quality standards due to insufficient staffing
- The significant financial costs of high turnover are unsustainable without increased rates for services

Service capacity continues to decrease due to a lack of qualified DSPs to provide care. In Pennsylvania, over 6,500 people have lost services so far and cannot return due to the lack of a qualified workforce. Provider organizations, self-advocates, and families seeking DSPs must compete with other industries capable of adjusting wages as needed to attract and retain workers. As previously stated, the community ID/A system is reliant upon funding through the ID/A fee schedule exclusively.

We urge your prompt review and approval of the Pennsylvania spending proposal and are certain that we speak for many other states that are experiencing further damage to their HCBS systems supporting people with disabilities with each day that passes without the needed relief promised under the American Rescue Plan.

We continue to work directly and cooperatively with our state officials through the Pennsylvania Office of Developmental Programs to ensure the safety and wellbeing of people served to the greatest extent possible. However, we need immediate help to address our current crisis in service delivery. Please feel free to contact us with any questions and thank you for your consideration of this urgent request.

Sincerely, The Provider Alliance Board of Directors,



Ruth Siegfried, President; Founder and President/CEO, InVision Human Services



Diane O'Rourke, Vice President; Chief Executive Officer, The Arc Mercer County

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William Stennett, Treasurer; Chief Officer Dev. Disabilities & HCBS Policy, Voices for Independence

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Susan Lautenbacher, Ph.D., Secretary; Chief Executive Officer, Lark Enterprises

Marisol Valentin

Marisol Valentin; Executive Director, McAuley Ministries

Patrick DeMico

Patrick DeMico, Executive Director, The Provider Alliance

cc: Tom Wolf, Governor, Commonwealth of Pennsylvania
Meg Snead, Acting Secretary, Pennsylvania Department of Human Services
Kristin Ahrens, Deputy Secretary, Pennsylvania Office of Developmental Programs
Bob Casey, U.S. Senator, Pennsylvania
Pat Toomey, U.S. Senator, Pennsylvania