



August 26, 2016

EOHHS, c/o D. Briggs
100 Hancock Street, 6th Floor
Quincy, MA 02171

Re: 101 CMR 411.00: Rates for Certain Placement and Support Services

To Whom It May Concern:

Thank you for considering our comments regarding the proposed amendments to *101 CMR 411.00: Rates for Certain Placement and Support Services*. On behalf of the 134 human service providers who offer services for individuals with intellectual and developmental disabilities (I/DD) and acquired brain injuries across the Commonwealth, ADDP submits the following comments.

ADDP's testimony will focus specifically on Shared Living Services.

We appreciate stipend levels 22-25 have been added, given higher support needs of some individuals. However, we are concerned that a corresponding operational rate level has not been attached to levels 22-25. The proposed stipend levels would most likely be applicable for individuals who present higher clinical, medical, monitoring, oversight, and/or professional care support needs, requiring increased operational support from providers. **ADDP recommends adding an additional operational rate level to correspond with the proposed increased stipend levels 22-25.**

ADDP providers have also expressed concern that reimbursement for fingerprinting is not being addressed in operational costs. The new unfunded mandate means that most providers are absorbing the cost. Most providers pay 100% of fingerprinting costs upon application or upon hire and completion of orientation. For providers to fulfill the anticipated January 2017 fingerprinting requirement for Shared Living placements, all household members over the age of 15 years must be fingerprinted, furthermore increasing operational costs. The financial burden of costs associated with fingerprinting requirements will likely impact providers ability to recruit new caregivers, and potentially put providers at risk of losing current caregivers. We understand from our members that certain subpopulations are hesitant with the fingerprinting process, which increases provider outreach efforts, leading to increased operational costs. Given DDS's initiative to significantly increase the amount of Shared Living placements in FY'17, ADDP strongly urges costs associated with fingerprinting be addressed in the proposed rates for *Certain Placement and Support Services*.

We also wish to ask that Shared Living Rates be adjusted to note the costs associated with both stipends and operational costs for DDS Activity Code 3150 Placement Codes. ADDP is concerned that stipends are excluded from calculating the administrative rate for shared living, thus not reflecting the true administrative cost. Furthermore, we are concerned that operational rates are inadequate and depressed noting that operational rates are being determined by using outdated information based upon UFR data. As is widely agreed within the provider and funder community, UFR data is inadequate for determining current cost. Additionally, the current model does not include funding for positions above the program manager position, thus further giving an inadequate rate conclusion.

We hope the concerns expressed in this testimony will be taken into consideration, and we look forward to our continued collaboration with DDS to improve and expand the options for community based services.

Thank you again for the opportunity to submit comments.

Sincerely,

A handwritten signature in black ink that reads "Adam Berman". The signature is written in a cursive, flowing style.

Adam Berman
Manager of Member Services