



Pennsylvania Advocates and Resources
for Autism and Intellectual Disabilities



Ms. Kristin Ahrens, Deputy Secretary
PA Department of Human Services
Office of Developmental Programs
625 Forster Street, Room 502
Harrisburg, PA 17120

December 2, 2024

Dear Kristin:

As leaders of the ID/A Provider Associations of PA, we are writing to you today to request that you meet with us. We would greatly appreciate the opportunity to address concerns we have with the implementation of Performance Based Contracting, as soon as possible. We believe that our system is at a crossroads- and amidst an increasingly volatile political environment both statewide and nationally- it is even more critical that individuals and their families, the providers, the advocacy community/associations, and ODP/DHS/the Shapiro administration itself are moving forward together.

Here is a summary of what we would like to discuss:

- **Ensuring Network Adequacy-** After the initial determinations of round 1, it appears that no applicants have met the criteria to be “Select” or “Clinically Enhanced.” While this is not the full number of providers, nor a majority sampling of the provider system, it should give pause and raise questions about the process and standards moving forward, given that not one qualified. How is ODP taking this information to prepare for the remaining providers to apply next spring, given the standards for network adequacy?
 - Given that currently no providers have been assigned to either the Select or Clinically Enhanced tiers from the initial round of submissions, we recommend that criteria be adjusted accordingly, or that attestations be accepted to meet specific criteria, to ensure that a sufficient number of providers qualify in the next round of tier assignments. Additionally, we recommend that all providers be afforded the opportunity to resubmit applications as there could be no argument that previously approved providers were required to meet a higher standard.



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- **Ensuring workforce sustainability-** In addition to limiting access because of our collective clinical capacity will not have grown, we are also worried about the provider network’s inability to grow the size and quality of our workforce (especially credentialed staff). The workforce, we agree, is essential to overall sustainability.
- **Ensuring Timely disputes, and/or appeals-**We would also like to talk about the timelines for appealing of tier assignments.
- **Protecting Available funds from potential political pressures-**One of the major implications of not having providers in the upper tiers, combined with continued low utilization, is not cementing allocated funds into our system. We have seen how the General Assembly misinterprets money left on the table in the past. We cannot risk, in a political environment like this, that Governor Shapiro’s landmark investment and continued commitment to us will not actually get to the people for whom it is intended.

Please know that we remain aligned philosophically with the principles of PBC and generally support this new model. We thank you for your time and attention, as always, and look forward to scheduling a time to connect.

Sincerely,

Sincerely,

Cherie Brummans
Executive Director
The Alliance CSP

Sherri Landis
Executive Director
The Arc of Pennsylvania

Diane Conway
CEO
MAX Association

Mark Davis
President & CEO
PAR

Patrick DeMico
Executive Director
The Provider Alliance

Richard S. Edley, Ph.D.
President and CEO
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