



February 28, 2022

The Honorable Meg Snead, Acting Secretary  
Pennsylvania Department of Human Services  
625 Forster Street  
Harrisburg, PA 17120  
*Via Electronic Mail*

Dear Secretary Snead:

On behalf of the Pennsylvania Homecare Association (PHA) and our members who provide personal assistance services (PAS) under the Community HealthChoices (CHC) waiver, I write to you today to ask the Department to allow for meaningful public comment and input as it moves toward implementation of an Agency with Choice (AWC) model in CHC.

As you know, the Office of Developmental Programs (ODP) currently operates an AWC model. It includes more than a dozen providers in regions across the Commonwealth. As you also know, however, ODP remains a Fee-For-Service model. As a result, DHS is able to set parameters that may be more complicated in the CHC managed care space, including wage ranges and overtime limits.

In public announcements about the Office of Long-Term Living's (OLTL) plans to implement AWC in CHC, OLTL has said that it intends to name one statewide vendor. In subsequent conversations, we have heard that there may be more than one. We've asked for details regarding benefits, wage, and other program expectations, but understand that many details are still being worked out.

We know that the Governor's budget proposal allocates \$280,000 to implement the model in FY 2022-23, but have not heard any estimates about future costs. We've heard that the model is intended to provide additional choice for consumers, which we support, but depending upon how the program is implemented, we are concerned that it will have the opposite effect.

In fact, this program effectively already exists in Pennsylvania. As you know, there are agencies today in all parts of the Commonwealth that hire, train, and support DCWs who are family and friend-caregivers. These agencies pay for background checks, TB testing, ongoing training and competencies, transportation, overtime, and more, in overseeing the care for thousands of consumers across the Commonwealth.

Without more information and the opportunity to provide input, it is impossible to tell whether OLTL's planned AWC is merely duplicative of services that are already being provided, adding costs to the system, and narrowing choice, without adding benefits. In addition, Pennsylvania is far from monolithic; providers who serve consumers in Philadelphia face very different circumstances in providing care than those operating in northwestern PA.

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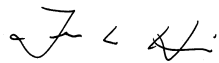
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As DHS is working through the FMS transition to Tempus, the reprocurement of Physical HealthChoices, and the deadline for Electronic Visit Verification in Home Health, we are concerned that rushing this program through without adequate discussion and stakeholder input will hurt an already fragile system of care. With workforce challenges worse than they have ever been, and access to care already at risk, it is more important than ever that any changes to CHC proceed in a thoughtful, collaborative, and inclusive manner.

We respectfully request more information on the Department's plans for AWC, the opportunity for public and stakeholder input in the details, and a slower timeline for the project. We are confident that spending more time now will only benefit the program and, most importantly, the consumers who need quality, reliable care. We ask that DHS provide appropriate program detail and time for the public and stakeholders to understand, review, and provide input on any AWC model in CHC.

Thank you for your consideration of our comments and your leadership on these important issues. Please let us know if you have any questions or if we can provide any additional information.

Sincerely,



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cc: Elena Cross, Deputy Chief of Staff – Office of Governor Tom Wolf  
Jamie Buchenauer, Deputy Secretary – Office of Long-Term Living