

## Aged and Disabled Waiver Amendment ID.1076.R06.01

### Public Comments and Department Responses

**Public Comment Period: November 8, 2017 through December 8, 2017**

Verbal and written comments were submitted by the following individuals/organizations: DeLoris Dian Brown; Cindy Lequerick; Nancy Collins; Patricia Zaldivar; Shaunda Ahlrich; Teresa Gordillo; Norma Black; Leelola Hoskins; Beverly Dahl; Carrie Pittman; Elsa Gleason; Vivian McCune; Emerita Cisneros Acuña; Eddy Devin, Devin’s Home Care; A Caring Hand Home Health Care; Nancy Hosley, A Compassionate Care, Co.; Susan Todd; Tami Schuster, Trinity Home Care & Resource; Michelle Wood, ACCESS Care at Home, LLC; Stephanie Blalack; Corinna Perkins, Jennifer Jefferson, Jill Randall, Hari Adhikari, and Kami Peterson of A Better Care Home Health, Inc.; Judy Taylor, Idaho Commission on Aging; Denise Hubbard, ResCare Home Care; Dianne Preston, Patricia Sly, Renae Waterman, Kyle Smith, Branden Beier, Alternative Nursing Services, Inc.; Teresa Nelson, Home Helpers Home Health & Senior Care; Idaho Association of Home Care Agencies; Nichole Claiborn, ResCare Home Care; Bruce Weaver, AAging Better In-Home Care; Marcy Hayman, Loving Care & More.

W-Written V-Verbal	Comments	Responses	Waiver Amendment Language Change
<b>W</b>	The Department received multiple comments from caregivers supporting the proposed waiver amendment, citing concerns of competitive wages outside of the healthcare field and ability to continue working in community home care with the current reimbursement rate.	Thank you for your comments and support of the proposed waiver amendment.	No change required.
<b>W</b>	The Department received multiple comments from providers supporting the proposed waiver amendment, citing concerns of competitive wages outside of the healthcare field, recruiting qualified direct-care staff, hiring and retaining an adequate number of direct-care staff to meet participant needs, reducing staff turnover, access to staff in rural areas, cost savings of home and community-based services, and business sustainability.	Thank you for your comments and support of the proposed waiver amendment.	No change required.
<b>W</b>	The Department received multiple comments from family members of participants that are receiving personal care services in their homes supporting the proposed waiver amendment, citing concerns of hiring qualified direct-care staff, reducing staff turnover to improve continuity of care, reducing caregiver shortages, and concerns of competitive wages outside of the healthcare field.	Thank you for your comments and support of the proposed waiver amendment.	No change required.

<b>W</b>	The Department received multiple comments from agency clients supporting the waiver amendment, citing concerns of competitive wages for direct-care staff, hiring reliable and qualified direct-care staff, reducing staff turnover, and access to staff in rural areas.	Thank you for your comments and support of the proposed waiver amendment.	No change required.
<b>W</b>	The Department received lists of signatures supporting the proposed waiver amendment.	Thank you for your support of the proposed waiver amendment.	No change required.
<b>W</b>	<p>My agency is in full agreement with your proposal to change the methodology used to reimburse PAAs for Personal Care Services (PCS). Utilizing the “four cost components” methodology rather than the old 1999-based time studies more accurately captures the true costs PAAs face in providing PCS waiver services in the current environment.</p> <p>Factoring in PAAs’ program related costs, along with indirect and administrative costs creates a reimbursement formula that will better benefit waiver participants’ access to services. The proposed formula will allow PAAs to more aggressively compete for employees against other business sectors that offer higher wages and benefits. The twin aspects of caregiver employee recruitment and retention have become increasingly critical as wage pressure continues to move upward across Idaho and the nation in general. The new reimbursement rates will assist greatly in helping PAAs attract and retain well-qualified caregivers.</p> <p>Thank you for your support and assistance throughout the year. Idaho’s waiver participants will be the ultimate beneficiaries of this important change.</p>	Thank you for your support of the proposed waiver amendment. We agree that the proposed methodology captures provider costs and reimbursement needs more accurately.	No change required.
<b>W</b>	The Idaho Commission on Aging is in support of the pending amendment to Idaho’s Aged and Disabled 1915(c) Waiver. We believe that this may positively increase the availability and quality of workers who provide important community based services to Idaho’s expanding aging population, thus supporting aging in their community of choice for as long as possible.	Thank you for your comments and support of the proposed waiver amendment.	No change required.