

Director Davis,

At this point in time, providers are experiencing the highest number of COVID cases since the pandemic occurred. We have to keep in mind that providers are stressed out and feel a lot of anxiety just trying to make sure they can keep the people they serve safe and healthy. They are losing staff almost daily and trying everything they can to make sure they have enough staff to support people. At the same time, they are trying to procure PPE, meet OSHA regulations, facilitate visitation (in-person and remotely), complete individualized planning for trips home with family, keep up with CDC recommendations, secure testing or comply with testing requirements and prepare for the various COVID vaccines. Many are also trying to help staff and residents deal with grief, as they are experiencing COVID related deaths of individuals served or staff.

The Ohio Health Care Association and the Ohio Provider Resource Association, with full support from the Ohio Association of County Boards, would like to make the following recommendations related to current DODD initiatives:

- 1) Single Assessment and Service Plan Training
  - a. We understand if IT work needs to continue due to financial commitments, but providers do not have time to do testing or training at this point. We recommend delaying the implementation date from March 2021 to summer 2021.
- 2) Compliance Reviews (and Accreditation)
  - a. Delay until cases slow and vaccines are administered to staff and people served
- 3) BluePrint Workgroup & multiple subcommittees
  - a. We appreciate DODD agreeing to pause this work.
- 4) BEST Service implementation work
  - a. This work should be paused in coordination with the BluePrint Workgroup
- 5) Certification Rule changes
  - a. Delay until pandemic is over and then re-open for comments/discussion prior to filing
- 6) ICF Quality Indicators
  - a. Continue path to delay until cost reports are due
- 7) Behavioral Support Workgroup
  - a. Perhaps create small subgroup to address chemical restraints issue and then reconvene with larger group when cases slow and vaccines are administered to staff and people served
- 8) Workforce workgroup
  - a. We appreciate the department hearing our concerns and refocusing this group on the immediate staffing needs during the pandemic.
- 9) DSP Wage Verification Survey
  - a. Continue with sample group of providers as agreed upon with survey to take place between March and July 2021

We also have to keep in mind other efforts that impact providers including the new Provider Network Module, EVV, ICF Cost Reporting, Intensive Behavior Support ICF program, OhioRISE, HHS Provider Relief Fund reporting, PPP loan forgiveness requests, etc.

Our providers are exhausted, overwhelmed and struggling to continue to face the daily challenges they encounter. They are passionate about serving people with disabilities and will go to all lengths to meet the needs of the people they serve, but they just need a break right now. Less change and more support.

We appreciate your review of this request. OHCA, OPRA & OACB would like to request a call with you for a strategic discussion of the priorities for Ohio's DD system over the next six months.