



DODD Public Hearing Testimony

Rules 5123:2-9-06, 5123:2-9-31, and 5123:2-13-07 (rescission)

March 19, 2010

I am Mark Davis, President of the Ohio Provider Resource Association (OPRA). OPRA is a statewide trade association of providers of services to individuals with intellectual and developmental disabilities. Thank you for the opportunity to comment on the revisions to 5123:2-9-06 and 5123:2-9-31 being proposed by the Ohio Department of Developmental Disabilities (DODD).

OPRA is a proponent of the requirement that all county boards and providers use a standardized cost projection instrument developed by DODD with stakeholder input. This will increase standardization, transparency and accountability across Ohio and may lead to efficiencies as well. We appreciate the department's unwavering assurance of provider access to this instrument, which will be critical to its success.

We are grateful for the open communication between the department and stakeholders on the revision of these important rules. The opportunity for input already afforded to us is greatly appreciated. We understand that DODD is prepared to refile an amended version of the rules to incorporate feedback from stakeholders up to and through this public hearing. OPRA supports the revisions to 5123:2-9-06 and 5123:2-9-31 dated March 19, 2010 with two suggestions:

1. (I)(9) Beginning October 1, 2010, county boards shall complete a cost projection using the CPT when an individual is initially enrolled on an individual options or level one waiver and when an individual is annually re-determined eligible for continued enrollment on an individual options or level one waiver. CPT will be the only validated cost projection instrument at that time.
2. (K)(3) Claims for payment shall include the number of units of service. Except for claims for HPC daily billing unit, claims for payment shall include the number of staff providing the service and the number of individuals sharing the service.

OPRA stands ready to work with DODD to implement the CPT in a timely and efficient manner. Thank you for the opportunity to testify today.