



November 22, 2010

Ms. Julie Evers, Section Chief
Aging and Disability Policy Section, Bureau of Long Term Care Services
Ohio Department of Job and Family Services
30 East Broad Street, Columbus, OH 43215

Dear Julie,

Please consider this a formal response to Ms. Plouck's letter of November 8, 2010 seeking parties interested in exploring changes to the grouper methodology currently used in the ICF/MR program.

OPRA supports this effort and believes that available resources can be more equitably distributed throughout the system with changes in the number of acuity categories. Access to the raw IAF data is critical in correctly evaluating the impact of any proposed changes to the ICF/MR system as a whole.

We would use the IAF data to analyze the impact of an increased number of acuity categories to determine if individual facility scores would change. Although total dollars in the system will remain the same for the purposes of this analysis; we believe additional categories may cause substantive changes in the groupings and thereby change the overall allocation. The concept is to reduce rate compaction and allow real differences in resident need to drive reimbursement.

Our overall goal is to present the most equitable results of our modeling to ODJFS for review.

Thank you for your consideration of OPRA's proposal. Should you have any questions or need any further information, please don't hesitate to contact me at 614.655.0170.

Sincerely,

A handwritten signature in black ink that reads "Anita Allen". The script is fluid and cursive, with the first name "Anita" and last name "Allen" clearly distinguishable.

Anita Allen
Vice President