**OPRA’s Position in Response to DODD’s Biennial Budget Initiatives and Private ICFIID Downsizing/Conversion Efforts**

1. **Current DODD IAF reviews and subsequent rebasing should not be used to impact scores for FY 14 and FY 15**

* **Application of reviews across providers are inconsistent, resulting in invalid scores**
* **Reviewers are focusing on documentation not previously required**
* **Appeals process is inconsistently applied and changes over time**

1. **No Flat Rate for FY 15**

* **Invalid scores should not be used to set a flat rate which will not cover costs of services**
* **Current review and rebasing process appears to significantly add numbers of typical adaptive individuals (4s)**
* **Flat rate attempts to rebalance system through disincentives not through a coordinated, collaborative, proactive effort**
* **Providers will document to the IAF which will increase scores, causing further disruption to the system**

1. **Keep Formulary in Statute**

* **ICF Formula historically in statute**
* **Allows for maximum stakeholder input as changes are proposed**

1. **Eliminating the Rollback**

**Suggested Alternative**

**OPRA members are not opposed to the direction outlined in DODD’s White Paper. Many of our members have indicated a willingness to work with the Department and County Boards to downsize and to discuss the possibilities of conversion. We think that individual provider volunteer efforts will ultimately achieve the desired results. We do not yet see from DODD a structured, collaborative communication process with county boards and providers to talk about how this truly might be effectively accomplished. Incentives seem to be offered on a first come first serve basis and the true time-consuming details of mass downsizing and conversion have been lacking.**

**We propose the establishment of a representative workgroup empowered to identify suggested models and pilot projects for downsizing and conversion. This can happen concurrent with those providers who have identified a desire to move forward in concert with the Department on their own.**