DODD has indicated a willingness to open up the Provider Certification Rule for discussion as part of the Provider Compliance Workgroup established in the last state budget. We have included a list of potential discussion points to assist in thinking about both the broad scope of the rule and the many areas that could be revised. Conceptually, this provides our system an opportunity for a fundamental re-write of a rule that has such sweeping impact on the provision of service in our system.

**Requirements for Agency Provider Certification**

CEO Requirements—Paragraph (D)(1) pg. 4

-Are these too narrow or too broad? **Too broad..it appears that someone with a Bachelor's Degree is equivalent to 4 years of experience with a HS Diploma. Why not just say must have a HS Diploma or more with 4 years experience? Having a degree doesn't seem to be a requirement, so why have it in there.**

-Do we want to begin to limit the number of new agency providers coming into our system? **NO, competition creates quality and choice.**

Annual CEO Training Requirements—(D)(1)(i) pg. 5

-Are the existing requirements still relevant or are there alternatives that would better enhance ongoing CEO performance? **No, Is it really necessary to be "trained" in the same things every year ? shouldn't we get trained in new concepts and protocols? Like continuing education, i.e. BELTSS, Administrator trainings, etc.**

Agency Requirements (D)(9-16) pgs. 7-8

-Questions or concerns with current requirements? **We don't need annual written notice that employees can be put on the registry, etc. They are told this when hired. I don't think we need to constantly instill the fear of being charged, convicted to make staff "behave".**

DSP Requirements (D)(17) pgs. 9-11

-Revisit the 18 yrs of age requirement? Can you think of work scenarios where a younger employee would fit? - **A high schooler that is going through the DSPaths training through their school. They should be able to as an intern to get real life experiences as a DSP. Also, younger teens should be able to work as "socializers" to interact with individuals during evening hours and weekends. Not do personal care but create an supervised environment of socialization and community integration. Both create a younger workforce for the future. We lose these people to the fast food and skilled nursing facilities early on and it is difficult to compete for staff later.**

-Revisit the high school degree or GED requirement? Same as above. **I have been trying to get this changed for a decade but ARC votes against it and stops me every time. There are some wonderful caring people in their late 20's and 30's that, for some reason, did not graduate from high school (teen pregnancy, so parental support, had to work to help support the family or babysit siblings, etc.) They would be great DSPs and would appreciate the lousy pay. We cut these folks right out of our workforce. It's crazy, they are wonderful people, who have families to feed, bills to pay and want to help others; it's all they know. A HS diploma does NOT make you a better person or DSP, a caring heart and soul does.**

DSP Training Requirements (D)(17)(g,h,I,j) pgs. 10-11

-Are the training requirements reflective of need? Do the requirements, prior to providing direct service, make the most practical sense or have we learned more effective ways of training? **Why do we have to use the American Red Cross first aid training and CPR, what's wrong with The American Heart Association? Give us a chance to negotiate prices. ARC has us cornered, they can charge whatever they like and we have to take it.**

-Are the continuing education requirements still the most relevant or productive or are their alternatives that would enhance DSP performance? **We keep teaching them the same stuff every year, give us the flexibility to teach them new things. The staff that has five years of experience get bored, they are not listening to us drone on, they know this stuff. Give them something new to learn.**

Standards of Service Provision (F) pg. 13

-Suggest a complete review of this section-what is its purpose, is it still practical? **This section sounds more like an employee handbook, unlike the agency section. If the DOL looked at this would they say it insinuates that these independent providers are indeed employees of the State of Ohio?**

Procedures for Obtaining Initial Certification (G) pg.14

-Suggest a complete review of this section specific to DODD processes **This section sounds more like an employee handbook, unlike the agency section. If the DOL looked at this would they say it insinuates that these independent providers are indeed employees of the State of Ohio?**

Procedures for Obtaining Certification to Provide Additional HCBS Services (H) pg.16

-Suggest a complete review of this section specific to DODD **processes If you are already an Agency Provider, why require the submission of the same documents all over to add services. It does not expedite the process and once the app is in process, no other changes can be made to your record, its locked up until DODD does their review.**

Procedure for Obtaining Renewal Certification (I) pgs. 16-18

-Suggest a complete review of this section specific to DODD processes - **Do you really think we get rid of all the documents we used to get certified, why submit them again? If we are a provider in good standing with limited citations or issues, we should have to update our information but not go through this time consuming process (for the provider and the department). The reasons to not renew are already on page 21. I think a simple update of information is all that is necessary.**