

From: [Angie Martin-Bakener](#)
To: [HFS.BPPC](#)
Subject: [External] wage increases
Date: Wednesday, November 16, 2022 2:18:56 PM

Can you please explain to me what employment-related expenses means? Is this an increase? Or what is this?

- Employment-related expenses updated as follows:
 - Aides – 29.9%
 - Nurses – 24.9%
 - Qualified Intellectual Disabilities Professionals – 28.1%

Angie Martin-Bakener,
Manager of QIDP Services
QIDP | Residential Liaison | HBS-SDA

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From: [Sr. Rhonda Brown](#)
To: [HFS.BPPC](#)
Subject: [External] Wage increase
Date: Wednesday, November 16, 2022 2:25:42 PM

Thank you so very much for the upcoming wage increases for our front-line staff! This will help tremendously in encouraging them to stay in this field, and hopefully attract new employees.

My question is this: Can any of the funds be used for ancillary staff? Our dietary, office and maintenance staff are also facing large cost-of-living increases and would benefit from a wage increase.

Thanks and God bless you.
Sr Rhonda

Sr. Rhonda Brown
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[Via e-mail]
December 7, 2022

Bureau of Program and Policy Coordination
Division of Medical Programs
Healthcare and Family Services
201 South Grand Avenue East
Springfield, IL 62763-0001

Re: Comments to HFS's Proposed Changes related to PA102-0699
ICF/DD & MC/DD Rate Increases

To Whom It May Concern:

Pursuant to the Department of Healthcare and Family Services (HFS) November 11, 2022 Public Notice regarding rate increases for facilities licensed by the Department of Public Health under the ID/DD Community Care Act, as well as facilities licensed under the MC/DD Act for services delivered on or after January 1, 2023, we are submitting the following comments.

MC/DD Exceptional Care Tiers:

HFS should apply the equivalent increase to the base rate to the MCDD exceptional care tiers. The Public Notice does not make this clear even though Illinois law does.

Public Act 100-0646 which created the exceptional care reimbursement tiers for MCDDs included language intended guarantee the new tiers remained higher than the base rate by mandating HFS increase the tiers and equivalent amount.

305 ILCS 5/5-5.4h) subsection (g)

“Any reimbursement increases applied to providers licensed under the ID/DD Community Care Act must also be applied in an equivalent manner to medically complex for the developmentally disabled facilities.”

HFS’ actions indicate they understood this intent when in 2019 they filed a Medicaid State Plan amendment (“SPA”) to increase the MCDD tier rates when the base rates were increased. Federal CMS approved SPA 19-0012 in November 2019.

We urge HFS to increase the MCDD tier rates by an amount equivalent to the base rate increase stated in the Public Notice.

Mandated Wage Increases in ICF/DD’s & MC/DD’s, which also have a Skilled Nursing Facility (SNF) license:

When an ICF/DD or MC/DD is also dually licensed as a Skilled Nursing Facility (SNF), mandated wage increases create many issues. These facilities must provide wage increases to its staff when the SNF rate increases, based on SNF program requirements, and again to its staff when ICF/DD or MC/DD Wage increases are mandated. The facility is not given credit for the impact of the staff wage increases on one licensure type, caused by a different licensure type wage mandate.

Therefore, any changes to these facility’s staff wage rates in ICF/DD’s or MC/DD’s, results in cost increase for the facility due to separate SNF wage increases. Whether a facility gave increases due to other mandates or just because of market factors, this time-limiting mandate will double our costs due to the dual license.

We request the Department take into account the following factors when determining the final rule mandating pay increases.

- The facility’s previous wage increases for the entire previous twelve (12) month period; and

- The facility's dual-license status, reducing the mandate by 50% - or by an amount equal to the NON-ICF/DD or NON-MC/DD census as a percentage of the facility's total census.

Thank you for your consideration. If you have any questions, I can be reached at: Mike Bibo; 309-368-1672, mbibo@LTCsupport.net.

Respectfully,

A handwritten signature in blue ink that reads "J. Michael Bibo". The signature is fluid and cursive, with a long horizontal stroke at the end.

J. Michael Bibo
President
Center for Developmental Disabilities Advocacy & Community Supports

ec: Marie Rucker – Executive Director; CDDACS



EXCEPTIONAL
CARE & TRAINING CENTER

December 7, 2022

Bureau of Program and Policy Coordination
Division of Medical Programs, Healthcare and Family Services
201 South Grand Avenue East
Springfield, IL 62763-0001

Dear Sir or Madam:

This letter serves to provide comments concerning the proposed changes in reimbursement method and standards issued by the Illinois Department of Healthcare and Family Services on November 11, 2022. The proposed changes will impact reimbursement rates effective January 1, 2023.

Please consider applying an increase to the tier rates for the Medically Complex Facilities for Persons with Developmental Disabilities (MC/DD) communities in the same manner as the base rates for the MC/DD communities.

Exceptional Care & Training Center (ECTC), a non-profit organization located in Sterling, Illinois. ECTC operates as Medically Complex Facilities for Persons with Developmental Disabilities (MC/DD) with a license for 85 residents. We provide complex medical support and compassionate care for persons with severe and profound intellectual disabilities in a 24-hour residential community. We are able to serve all ages from birth to 100+. **Our facility is unique in the State of Illinois – only ten facilities are licensed as Medically Complex Facilities for Persons with Developmental Disabilities.** Our comprehensive service system is capable of meeting the habilitation, restorative and long-term needs of individuals who are victims of genetic disorders, birth trauma, accidents, physical abuse or debilitating or life threatening diseases. We also provide an adult day training program on-campus due to the complexities of the care our residents require. All of our residents are completely dependent for all activities of daily living and require an extensive staffing support system 24-hours a day.

The state approved a tiered rate structure specific to the MC/DD communities in 2019 to provide additional funding for residents who receive nourishment via a feeding tube, receive tracheostomy care or are on a ventilator. The additional funding was extremely beneficial to organizations such as ours, as the care for these higher acuity residents obviously comes at a higher cost than other residents in a DD long-term care environment. **Tier rates are not considered "base rate" and are not "in addition to" base rates and have remained unchanged since August 2019.**

We are grateful that the State recognizes the need to increase frontline wages, but the continued omission of the tier rates in this initiative is creating extreme hardships on the MC/DD communities. Residents at base rate and residents at tier rate receive support from the same frontline staff – with the tier rate individuals requiring additional staffing support. MC/DD's have

about 18% higher nursing staff hours per resident day than SNFs and more than twice that of other DD facilities (based on data from 2019).

Omission of the tier rates in the increases significantly minimized the effectiveness of the incremental increases of the last two years and has created an unintended financial burden on our ability to sustain competitive wages.

- In 2021, ECTC received a combined 5.1% increase in rates for 56% of our residents; this equaled an effective increase of 2.9% while our frontline wages increased 9.3%.
- In 2022, ECTC received a 7.2% increase on 56% of our resident; this equaled a 4% increase while our frontline wages increased 12.7%.

The inability to provide competitive wages in the MC/DD facilities has dire consequences on the DD community. Prior to pandemic, our facility consistently maintained a 95% or above census rate. Our beds were full and we had a waiting list. During past two years, our facility has seen a significant increase in referrals of individuals needing our specialized care. This referral increase is most likely due to COVID-related health changes of the individuals and the record number of DD providers downsizing and closing in response to the staffing crisis. Individuals who require the most care are the individuals most adversely impacted by decisions to downsize – they are the first to be transferred, as they require the greatest staffing support. These individuals have severe and complex medical needs which are complicated by underlying developmental challenges. Their medical and social needs cannot be met by traditional ICF/DDs or SNFs, thus was the evolution of the MC/DDs. Although we have available beds for these hard-to-place individuals, we are unable to accept them due to our own staffing challenges; undoubtedly resulting in inappropriate placement and/or placement in State facilities at a higher cost.

The state has been proactive in providing funds to MC/DD facilities, with emergency rate increases in response to COVID in 2020 and annual increases to help with Illinois' minimum wage increases as well as the wage pressures that have been facing our industry across the nation. However, past increases have only been applied to the base rate, which represents just over half of our residents. Increases in only the base rate are not sufficient to cover the dollars meant to provide relief related to the staffing crisis.

We have seen wage increases of over 23% in the last two years, so applicability of the rate increases across all of our residents is crucial to meet staffing needs. We believe any increase in the base rate should be applied in the same manner to the tiered rates for the MC/DD facilities to provide the intended funding for care provided for all of our residents.

Thank you for your attention on this matter. Feel free to reach out with questions or if you need additional information or clarification.

Sincerely,


Melissa Francque
Executive Director



SWANN
SPECIAL CARE CENTER

December 14, 2022

Bureau of Program and Policy Coordination
Division of Medical Programs, Healthcare and Family Services
201 South Grand Avenue East
Springfield, IL 62763-0001

Dear Sir or Madam:

This letter serves to provide comments concerning the proposed changes in reimbursement method and standards issued by the Illinois Department of Healthcare and Family Services on November 11, 2022. The proposed changes will impact reimbursement rates effective January 1, 2023.

Please consider applying an increase to the tier rates for the Medically Complex Facilities for Persons with Developmental Disabilities (MC/DD) communities in the same manner as the base rates for the MC/DD communities.

Swann Special Care Center, a non-profit organization located in Champaign, Illinois. Swann operates as Medically Complex Facilities for Persons with Developmental Disabilities (MC/DD) with a license for 123 residents. We provide complex medical support and compassionate care for persons with severe and profound intellectual disabilities in a 24-hour residential community. We are able to serve all ages from birth to 100+. **Our facility is unique in the State of Illinois – only ten facilities are licensed as Medically Complex Facilities for Persons with Developmental Disabilities.** Our comprehensive service system is capable of meeting the habilitation, restorative and long-term needs of individuals who are victims of genetic disorders, birth trauma, accidents, physical abuse or debilitating or life threatening diseases. We also provide an accredited school and an adult day training program on-campus due to the complexities of the care our residents require. All of our residents are completely dependent for all activities of daily living and require an extensive staffing support system 24-hours a day.

The state approved a tiered rate structure specific to the MC/DD communities in 2019 (Federal CMS approved SPA 19-0012) to provide additional funding for residents who receive nourishment via a feeding tube, receive tracheostomy care or are on a ventilator. The additional funding was extremely beneficial to organizations such as ours, as the care for these higher acuity residents obviously comes at a higher cost than other residents in a DD long-term care environment. **Tier rates are not considered "base rates" and are not "in addition to" base rates and have remained unchanged since 2019.**

109 Kenwood Drive

Champaign, IL 61821

Phone: (217) 356-5164

Professionally Managed by HUTSONWOOD

We are grateful that the State recognizes the need to increase frontline wages, but the **continued omission of the tier rates in this initiative is creating extreme hardships on the MC/DD communities.** Residents at base rate and residents at tier rate receive support from the same frontline staff – with the tier rate individuals requiring additional staffing support. MC/DD's have about 18% higher nursing staff hours per resident day than SNFs and more than twice that of other DD facilities (based on data from 2019).

Roughly 70% of our residents receive a tier rate. Omission of the tier rates in the increases significantly minimized the effectiveness of the incremental increases of the last two years and has created an unintended financial burden on our ability to sustain competitive wages. Swann only received an increase for roughly 30% of our residents. This is not sufficient to support the mandated wage increases for all our frontline staff!

The inability to provide competitive wages in the MC/DD facilities has dire consequences on the DD community. During the past two years, our facility has seen a significant increase in referrals of individuals needing our specialized care. This referral increase is most likely due to COVID-related health changes of the individuals and the record number of DD providers downsizing and closing in response to the staffing crisis. Individuals who require the most care are the individuals most adversely impacted by decisions to downsize – they are the first to be transferred, as they require the greatest staffing support. These individuals have severe and complex medical needs which are complicated by underlying developmental challenges. Their medical and social needs cannot be met by traditional ICF/DDs or SNFs, thus was the evolution of the MC/DDs. Although we have available beds for these hard-to-place individuals, we are unable to accept them due to our own staffing challenges.

We have seen wage increases of over 18% in the last two years, so applicability of the rate increases across all of our residents is crucial to meet staffing needs. Increases in only the base rate are not sufficient to cover the dollars meant to provide relief related to the staffing crisis in the MC/DD facilities.

We believe any increase in the base rate should be and should have been applied in the same manner to the tiered rates for the MC/DD facilities to provide the intended funding for care provided for all of our residents.

Thank you for your attention on this matter. Feel free to reach out with questions or if you need additional information or clarification.

Sincerely,



Kym Halberstadt
Executive Director

109 Kenwood Drive

Champaign, IL 61821

Phone: (217) 356-5164

Professionally Managed by HUTSONWOOD



Hoosier Care, Inc.

December 6, 2022

Bureau of Program and Policy Coordination
Division of Medical Programs, Healthcare and Family Services
201 South Grand Avenue East
Springfield, IL 62763-0001

Dear Sir or Madam:

This letter serves to provide comments concerning the proposed changes in reimbursement method and standards issued by the Illinois Department of Healthcare and Family Services on November 11, 2022. The proposed changes will impact reimbursement rates effective January 1, 2023.

We would request applying an increase to the tier rates for Medically Complex Facilities for Person with Developmental Disabilities (MC/DD) communities in the same manner as any increase to the base rates for these communities.

Hoosier Care, Inc. operates three communities licensed as Medically Complex Facilities for Persons with Developmental Disabilities (MC/DD): Exceptional Care and Training Center in Sterling, IL; Swann Special Care Center in Champaign, IL; and Walter Lawson Children's Home in Loves Park, IL. Our communities provide complex medical support and compassionate care for persons with severe and profound and intellectual disabilities through our residential nursing care. We serve all ages from birth to 100+. Our facilities are unique in the State of Illinois – only ten facilities are licensed as MC/DD. Our comprehensive service system is capable of meeting the habilitation, restorative and long-term needs of individuals who are victims of genetic disorders, birth trauma, accidents, physical abuse or debilitating or life threatening diseases. All of our residents are completely dependent for all activities of daily living and require an extensive staffing support system. All three of our locations provide adult day training programs, and two locations provide accredited schools for individuals under 21 years of age on campus due to the complexities of the care our residents require.

The state approved a tiered rate structure in 2019 to provide additional funding for residents who receive nourishment via a feeding tube, receive tracheostomy care or are on a ventilator. The additional funding was extremely beneficial to organizations such as ours, as the care for these higher acuity residents obviously comes at a higher cost than other residents in a long-term care environment. These rates have remained unchanged since August 2019.

The state has been proactive in providing funds to MC/DD facilities, with emergency rate increases in response to COVID in 2020 and annual increases to help with Illinois' minimum wage increases as well as the wage pressures that have been facing our industry across the nation. However, the issue facing our communities is that the increases in reimbursement are only being applied to the base rate for MC/DD residents and not the tiers. Across our three communities, only 35% of residents are reimbursed at the base rate, so the increases pushed through by the state are only covering about 1/3 of the dollars meant to provide relief related to the increasing minimum wage and wage pressures. We believe any increase in the base rate should be applied in the same manner to the tiered rates to provide the intended funding for care provided for all of our residents. With minimum wage increases and overall staffing pressures, we have seen wages increases of around 10% in our

communities each of the last two years, so applicability of the rate increases across all of our residents is crucial to meet staffing needs.

Thank you for your attention on this matter. Feel free to reach out with questions or if you need additional information or clarification.

Sincerely,

A handwritten signature in blue ink, appearing to be 'Chris Louder', written in a cursive style.

Chris Louder
Vice President of Finance



www.marklund.org

info@marklund.org

Marklund Hyde Center

1S450 Wyatt Drive, Geneva, IL 60134
630.593.5500 | 630.593.5501 fax

Marklund Wasmond Center

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224.523.7530 | 847.622.5523 fax

Marklund Philip Center

164 S. Prairie Avenue, Bloomingdale, IL 60108
630.529.2871 | 630.529.3266 fax

Marklund Day School

164 S. Prairie Avenue, Bloomingdale, IL 60108
630.307.1882 | 630.397.5624 fax

December 8, 2022

Bureau of Program and Policy Coordination
Division of Medical Programs, Healthcare and Family Services
201 South Grand Avenue East
Springfield, IL 62763-0001

To Whom It May Concern:

This letter serves to provide comments concerning the proposed changes in reimbursement method and standards issued by the Illinois Department of Healthcare and Family Services on November 11, 2022. The proposed changes will impact reimbursement rates effective January 1, 2023.

Please consider applying an increase to the tier rates for the Medically Complex Facilities for Persons with Developmental Disabilities (MC/DD) communities in the same manner as the base rates for the MC/DD communities.

Marklund is a nonprofit organization that serves infants, children, teens and adults with severe and profound developmental disabilities and special healthcare needs. At Marklund, everything we do begins with caring for each and every child or adult with the same care we would want for our own family members. Many of our residents and community clients are non-ambulatory and have severe cognitive deficits due to genetic disorders or complications during pregnancy and delivery. Others acquired disabilities during infancy or childhood through tragic accidents. Many have complex medical problems that require 24-hour skilled nursing care.

In the State of Illinois, **only ten facilities are licensed as Medically Complex Facilities** for Persons with Developmental Disabilities. All of our residents are completely dependent for all activities of daily living and require an extensive staffing support system 24 hours a day.

The state approved a tiered rate structure specific to the MC/DD communities in 2019 to provide additional funding for residents who receive nourishment via a feeding tube, receive tracheostomy care or are on a ventilator. The additional funding was extremely beneficial to organizations such as ours, as the care for these higher acuity residents obviously comes at a higher cost than other residents in a DD long-term care environment. **Tier rates are not considered “base rate” and are not “in addition to” base rates and have remained unchanged since August 2019.**

Residents at base rate and residents at tier rate receive support from the same frontline staff – with the tier rate individuals requiring additional staffing support. MC/DD’s have about 18% higher nursing staff hours per resident day than SNFs, and more than twice that of other DD facilities (based on data from 2019).

Omission of the tier rates in the increases significantly minimized the effectiveness of the incremental increases of the last two years, and has created an unintended financial burden on our ability to sustain competitive wages which results in a staffing crisis.

Marklund has seen significant wage increases in the last two years, so applicability of the rate increases across all of our residents is crucial to meet staffing needs. We believe any increase in the base rate should be applied in the same manner to the tiered rates for the MC/DD facilities to provide the intended funding for care provided for all of our residents.

Thank you for feel free to reach out with questions at gfonger@marklund.org.

Sincerely,

Gil Fonger
President & CEO
Marklund