

## **Public Comments**

## SPA 19-0002

## Prescribed Pediatric Extended Care (PPEC)

September 11, 2019 To: Margaret Wilson RE: Public Notice for SPA 19-0002 Prescribed Pediatric Extended Care Center

This request is being submitted on behalf of eight of the fifteen MSDH licensed PPEC facilities in Mississippi. The represented facilities are Delta Pediatric Care, DeSoto Pediatric Extended Care, Meridian Pediatric Extended Care, Gulf Coast Pediatric Care-Gulfport and Pascagoula, Personal Pediatric Care, Caring Hands PPEC of Vicksburg, and Caring Hands Prescribed Pediatric Extended Care.

We are writing to formally request an extension to the effective date of October 1, 2019 for SPA 19-0002. The purpose of our request for extension is two-fold:

- 1. The public notice for this amendment was posted September 5, 2019. The time frame between public notice and effective date is three and a half weeks. This is a very short time frame for evaluation of our current business model and comparison to a future model shaped by the proposed change to the reimbursement methodology. Upon development of a new model, we require time to implement operational changes in our facilities in order to continue to provide the highest quality services without interruption to the patients we serve and their families. In providing transportation to 90% of our patients this requires a great deal of communication with families, staff members, local schools, therapist, etc.
- 2. The proposed savings in state dollars was calculated using survey data supplied by (13) PPEC centers. We are requesting to review the survey methodology used prior to determination of the state plan amendment.

On behalf of all of the centers mentioned above,

Warmest Regards

## Ginger McBride, RN

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