



MISSISSIPPI DIVISION OF
MEDICAID

Public Comments

Mississippi Division of Medicaid

State Plan Amendment 20-0002

Private Duty Nursing (PDN) and Personal Care Services (PCS)



Good morning Ms. Wilson

First, I would like to thank DOM for being so helpful over the past few weeks as we work through the new guidelines and provider re-enrollment package. Our company has been providing the PDN services since 1993. There have been many changes over the years and we have worked side by side with Medicaid as well as the MCO's to provide the highest quality of care possible to the individuals we serve.

The new requirements bring additional oversight as well as services to the program which are welcomed and much needed however with these new requirement also comes additional costs involved that are not accommodated for in the current fee schedule. There has not been a rate increase in this program since 2009. Many other programs have received rate increases such as the Elderly and Disabled Waiver Program as well as the IDD Program as recently as 2017.

If you look at the new requirements and compare the LPN rate with that of the IDD Program you can see just how low the reimbursement is for PDN. The rate for hourly LPN on the IDD Program is currently \$35.72 an hour in comparison to the LPN rate on PDN of \$26.00 an hour.

The E&D Services which do not require a CNA nor do they require a supervisor visit by an RN are reimbursed at the same rate as the proposed rate for the CNA PDN services however there is a greater

cost involved for the supervisor visit as well as the additional training and the average wages of a CNA are typically higher than that of a direct support personnel. Will providers be able to bill for the supervisor visit? Also, during the COVID 19 crisis all other programs have waived the in-person supervisor visits in lieu of telephonic supervisor visits, will this also be the same for PDN?

For comparison purposes the IDD hourly rate is \$24.72 an hour for HCBS Services and as you can see the DSP hourly reimbursement is very near the rate of the LPN private duty nursing reimbursement. It isn't that the rate for the IDD services is high, rather that the LPN rate is low. The Mississippi Workers Compensation Fee Schedule rate for LPN is \$34.00 an hour and Alabama has a reimbursement rate of \$32.00 an hour for LPN PDN services.

The individuals on this program require the highest level of care in the home and we are competing for the same staff as hospital, home health agencies, nursing homes etc. that have a much higher reimbursement and pay scale than we can afford to pay at the rates we have currently.

Our goal is to provide the highest quality of care possible to all individuals however we must also have the funding to support the requirements of the program.

Sincerely

Debbie Garner

Debbie Garner

Regional VP

Help at Home/Formerly Oxford Healthcare

7/22/20
