



Pennsylvania Association of Elder Law Attorneys (PAELA)
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July 28, 2019

Via Email: RA-PWRFICOMMENTS@PA.GOV

Kevin Hancock, Deputy Secretary
Michael Hale, Bureau Director, Contractor and Provider Management
Department of Human Services
Office of Long-Term Living
Commonwealth of Pennsylvania
Harrisburg, Pennsylvania

RE: OLTL Application and Enrollment Services RFI - Cover Letter and Comments

Dear Secretary Hancock and Mr. Hale:

The Pennsylvania Association of Elder Law Attorneys (“PAELA”) appreciates the opportunity to Provide comments on the on the Office of Long-Term Living’s Request for Information.

PAELA’s members provide legal services to many of Pennsylvania’s older adults who access the important benefits provided through our important MA home and community-bases services, administered by the Office of Long-Term Living (OLTL). Our 179 members represent all parts of the Commonwealth.

The contact information for PAELA is set forth above and supplemented as follows:

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Very Truly Yours,

Linda M. Anderson

PAELA Comments - OLTL Application and Enrollment Services RFI

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Readiness Review: The proposed 90-day period gives a competitive advantage to the existing IEB. This period should be extended to at least six months.

Enrollment Services/Local Presence: It is essential for the IEB to have a local presence. We support the change to local based (county based preferably) enrollment case manager services that provide in-person assistance to applicants relating to the physician certification and completing the application process medical and financial eligibility.

In-Person Visits: Initial in-person visits are essential. Given the complexity of the process and the amount of information involved, additional visits may be needed by the consumer. The IEB should be required to provide additional meetings to ensure an efficient and effective enrollment process.

BSS v. IEB: Combining the Beneficiary Support System (BSS) with the IEB activity creates an inherent conflict of interest. These functions should be separated. Complaints and oversight connected to the enrollment process should not be handled by the IEB itself. Rather, these services should be provided by an entity or group of entities which are community-based and have a track record of advocacy for older adults and people with disabilities.

MIS Ownership: It is essential for the Commonwealth to own the Management Information System (MIS) to allow for independent monitoring and performance reviews.

Support for Comments of Community Legal Services of Philadelphia: We support the comments of CLS and request the Department give careful consideration to the concerns outlined in their comments.