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**Perspective from an Expert or Advocate in a Given State**

*We have some state association leaders who will send these, but this could be helpful for other folks who might be connected to our space and concerned about restricted access.*

**STATE THE ISSUE**

Tell readers what you are writing about and why it’s important.

**Example:** A historical inadequacy of Medicaid funding has led to a long-standing recruitment and retention crisis among disability service providers. Now, a proposed rule from the U.S. Department of Labor (DOL) could further impede workforce improvements.

**PROVIDE CONTEXT FOR THE ISSUE**

What do readers need to know about the rule?

**Example:** Over the summer, the DOL proposed a significant increase – up to 70 percent – in the salary threshold determining eligibility for overtime pay. Although disability service providers stand for policies that could increase wages for care professionals, they are restricted to following service prices dictated by Medicaid. Without accompanying federal directives to augment their available funding, providers face a serious threat to maintaining service availability. This poses a substantial risk to an already fragile network of community services for people with intellectual and developmental disabilities (I/DD).

**DESCRIBE THE IMPACT**

Detail what the effects of the proposed rule would be.

**Example:** With one [recent study](https://www.ancor.org/wp-content/uploads/2023/11/Memo-to-ANCOR-on-Cost-Impact-of-Proposed-DOL-Overtime-Rule.pdf) estimating the rule could lead to over $1 billion in additional costs to provider organizations, cuts to services and staffing would be inevitable. Providers face the option of either paying more in overtime costs or of raising salaries to bring employees above the new threshold. The repercussions of this are significant. Finding the necessary funding for either of these responses is likely to arise in the form of facility closures, shift time restrictions, and converting salaried employees to hourly wages at the risk of lost benefits. All of these harm not only the prospects of the disability services workforce, but also the independence and lives of the individuals with I/DD who benefit from these services.

**CLOSE WITH A SOLUTION**

From your point of expertise, highlight alternative options.

**Example:** Community providers cannot cover the costs of this proposed rule without an increase in resources. Better compensation for the care workforce should be an ongoing policy concern, but without sufficient Medicaid funding no federal regulation can truly uplift workers in an adequate way. The DOL should connect with other agencies and stakeholders to discuss appropriate funding mechanisms for fair wages so future proposals can match financial realities.