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**Perspective from a Provider Organization/Employer**

*It’s critical that the message come across as “we’re doing everything we can to pay more, but new regulations are colliding to make that so difficult we might have to consider other measures (e.g., what’s outlined in the Avalere report) to make that happen, and it makes us concerned about the quality of services or our ability to support everyone in need.”*

**STATE THE ISSUE**

This should tell readers what you are writing about and why it’s important.

**Example:** Disability service providers like [Provider Org] are concerned about a proposed rule from the Department of Labor (DOL) that would drastically impact our ability to provide care for persons with intellectual and developmental disabilities (I/DD).

**SAY WHO YOU ARE**

Add a brief 2-3 sentence paragraph about your organization.

**PROVIDE BACKGROUND INFORMATION**

What does a reader need to know to understand what your organization does?

**Example:** To offer high quality and individualized supports to individuals with I/DD, community providers enlist a dedicated workforce that goes far beyond basic caregiving to empower patients to fully participate in their surrounding communities and networks. Depending on an individual’s needs, the supports provided in Medicaid-funded home and community-based settings can help individuals engage in health advocacy, financial management, housing arrangements, job skill development, and other responsibilities enable them to maintain an independent life.

Direct support professionals, along with our administrative staff, work hard every day to expand the quality and enjoyment of life that individuals with disabilities can experience. While provider organizations actively seek to hire and retain a robust workforce, there is only so much we can do when our Medicaid service reimbursements rates are set by the state and haven’t seen an increase since [year, if applicable]. Increased operating costs are absorbed by providers as we cannot negotiate these rates nor pass along any costs elsewhere.

**EXPLAIN THE ISSUE**

Describe the problem and humanize the impacts of it.

**Example:** The DOL has now proposed to increase the nationwide salary threshold for overtime pay by as much as 70%. Without increased funding, providers will have to find ways to offset these new costs and will not be able to maintain our standards for service availability.

At [Provider Org], that could look like eliminating day programs and transportation services, leaving individuals without opportunities for community engagement and integration. In some cases, it could lead to providers closing down entire services. Other provider organizations have suggested they may have to reduce their staffing numbers, focus on future hiring of entry-level workers, shift salaried employees to hourly pay, or even close group home facilities.

**CLOSE WITH A SOLUTION**

Go beyond pointing out the problem and make a point of how it could be done differently.

**Example:** While questioning how to appropriately compensate workers is progress, jeopardizing the services of persons with I/DD is not the answer. The DOL must collaborate with other stakeholders to determine a path that does not risk cutting care for our vulnerable patient population. The proposed rule is admirable for its intent, but the potential consequences of this policy could inadvertently diminish the support systems it is intended to uphold.