Pennsylvania
Department of Human Services

Office of Developmental Programs Updates

ISAC

October 20, 2026



55 Pa Code Chapter 6100

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- Pa. Code Chapter 6100, Services for Individuals with an Intellectual Disability or Autism governs the programmatic, operational and fiscal aspects of:
  - Home and community-based services (HCBS) provided through 1915(c) waivers;
    - Consolidated, Community Living, Person/Family Directed Support, and Adult Autism Waivers
    - Adult Community Autism Program (ACAP) is NOT included
  - Medicaid State plan HCBS for individuals with an intellectual or developmental disability, or autism (Targeted Support Management), and
  - Services funded exclusively by grants to counties under the Mental Health and Intellectual Disability Act of 1966 (ODP Base-Funding).

- The code is intended to strengthen community services by promoting person-centered approaches, community integration, personal choice, quality in service delivery, health and safety protections, competitive integrated employment, accountability in the utilization of resources and innovation in service design.

Rationale for Amendments

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- In the 7 years since 55 Pa Code Chapter 6100 was promulgated, ODP's programs and services have evolved significantly to meet changing population needs, reflect best practices, and address sustainability issues.
- February 2026, the Commonwealth Court of Pennsylvania issued two opinions which require ODP to undertake regulatory amendments.
  - **Dunkleberger v. Department of Human Services** (Pa. Cmwlth., No. 1236 C.D. 2024) and
  - **Errickson v. Department of Human Services** (Pa. Cmwlth., No. 1237 C.D. 2024)

- The Court found that policies constituted unpromulgated regulations and were unenforceable by the Department. It further found that policies originating from the Waiver Agreements were only enforceable if they are based on federal or state statutes which were not identified by the Department.

Rationale for Amendments (Cont.)

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- September 2026, Public Interest Law Center filed suit (**Byrne v. DHS**) and while the litigation is pending, it underscores the need for ODP to undertake regulatory amendments.
- As a result, ODP is amending regulation to establish regulatory authority to set limitations for HCBS to address:
  - Health & safety
  - Program integrity
  - Conflict of interest
  - Fiscal constraints including federal financial participation

Amendments

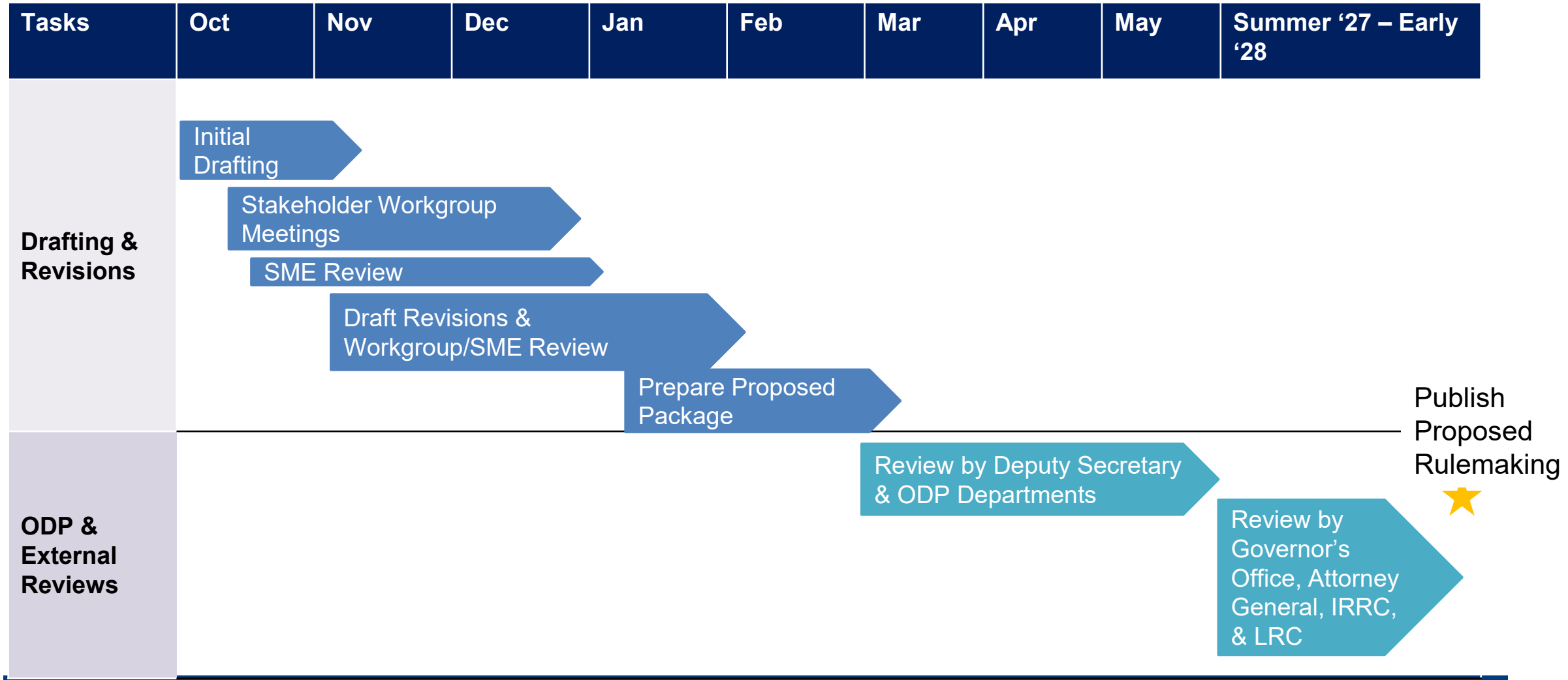
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Section	Updates
55 Pa. Code § 6100.45 - Quality Management (QM)	Changes in ODP's policy and to adopt best practices, including annual review of Quality Management plans.
55 Pa. Code §§ 6100.681 – 6100.694 – Room and Board	Clarifications, including payment of board expenses when an individual is in reserved capacity status.
55 Pa. Code §§ 6100.401 – 6100.405 – Incident Management (IM)	Updated policies through the IM rebalancing initiative, including changes to category structure, definitions, and review process. * Updates to IM require amendments to Chs. 2380, 2390, 6100, 6400 & 6500.
New Regulatory Sections	• Performance Based Contracting • Service limitations • Program integrity • Services by relatives • Services rendered during participant travel • Conditions for participation

Regulatory Process Anticipated Timeline

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Regulatory Amendment Anticipated Timeline



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Federal

Access Rule: Compensation Reporting

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Requirement:

eCFR :: 42 CFR 441.311 -- Reporting requirements. - Except as provided in paragraphs (e)(2)(ii) and (e)(4) of this section, the **State must report to CMS annually** on the **percentage of total payments** (not including excluded costs) for furnishing **homemaker services, home health aide services, personal care, and habilitation services**, as set forth in § 440.180(b)(2) through (4) and (6), that is spent on **compensation or DCWs**, at the time and in the form and manner specified by CMS. The State must report separately for each service and, within each service, must separately report services that are self-directed and services delivered in a provider-operated physical location for which facility-related costs are included in the payment rate.

When:

July 9, 2027

ODP will be using the **National Core Indicators State of the Workforce Survey** to comply with this Rule

H.R. 1 Implementation

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October 1, 2026:

- **SNAP administrative cost sharing:**
  - Generally been shared 50-50 by states and the federal government, changes mandated by H.R. 1 will cause the state's share of administrative costs of the SNAP program to rise significantly, to a 75-25 split starting FFY 2026-27.

- **SNAP ED Closes**
  - $29M funding for this program was cancelled in H.R. 1
    - DHS will use carryover funding to continue through FFY26

- **Medicaid Noncitizen Eligibility Changes**
  - Certain categories of noncitizens (refugees, lawfully-present immigrants) are no longer eligible for Medicaid/CHIP

- **Ongoing in 2026: SNAP Payment Error Rate**

ODP Communications:

Keep Your Medicaid Guide

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- **Most individuals enrolled in Medicaid services administered by ODP are not subject to Community Engagement Requirements (CER)**
  - However, Direct Support Professionals and relative caregivers may be
- **2025 ODP informational campaign on re-determinations**
  - **ODPANN 25-097: Maintaining and Verifying Medicaid Eligibility**
- **OIM/ODP communications workgroup on CER**
  - Outreach strategy
  - Materials



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Keep Your Medicaid

A Helpful Guide for ODP Participants

Don't Miss Your Medicaid Renewal

Look for the PINK Envelope!

Participants served through the Office of Developmental Programs (ODP) MUST complete their Medicaid renewal paperwork and submit the necessary documentation to the County Assistance Office (CAO) in order to maintain healthcare coverage and continue receiving critical ODP services. The CAO has made it even easier to recognize the arrival of your benefit renewal packet. Simply watch for a large PINK envelope in the mail and submit your renewal by the due date indicated.

ODP Participants **MUST** maintain Medicaid coverage to receive necessary medical, behavioral and ODP services.

What is Medicaid?

In Pennsylvania, Medicaid is called Medical Assistance. Medicaid provides access to essential healthcare needs and daily living support, including services provided through the Office of Developmental Programs' (ODP) Home and Community-Based Waivers and Targeted Support Management (TSM). Medicaid eligibility is determined by your local CAO.

Submit Your Renewal

- Via COMPASS
- By mail in the return envelope, or
- In-person to your CAO.

Preparing for Medicaid Renewals

Sign up for COMPASS

- Create COMPASS account
- Download MyCompassPA app
- Sign up for text messages through COMPASS

Pay attention to communications

- Respond to the CAO information requests
- Renew **ON TIME!**

Address potential eligibility issues NOW

Be Aware of Your Renewal Date(s)!

Report address changes

- Customer Service Center at 1-877-395-8930 or 215-560-7226 (Philadelphia) or to your local CAO
- COMPASS or MYCOMPASS PA mobile app

Report language needs

- Customer Service Center
- Write language needs on all documents submitted to the CAO
- Ask for interpreters if necessary

ODP Communications:

Why Use COMPASS?

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- ODP developed a guide to help ODP stakeholders learn about COMPASS and get started with account creation
- 10% of people with ID/A use COMPASS for benefits enrollment
- <2% have accounts
- Why Use Compass. A Helpful Guide for Office of Developmental Programs (ODP) Participants



Upcoming H.R. 1 Changes

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<u>January 1, 2027 – Major Changes to Medicaid</u>:

Affecting approximately **800,000 Pennsylvanians** in the Medicaid expansion group (Adults 19-64)

- **Work Requirements**
  - Adults ages 19-64 without dependent child under 14 years old must show that they are meeting or exempt from work requirements.
- **Six-month Eligibility Checks**
  - Medicaid expansion adults ages 19-64 renewal every six months
- **Retroactive Coverage**
  - Decreases from three months to:
    - One month for expansion adults.
    - Two months for all other Medicaid.

PA Approach to Medical Frailty

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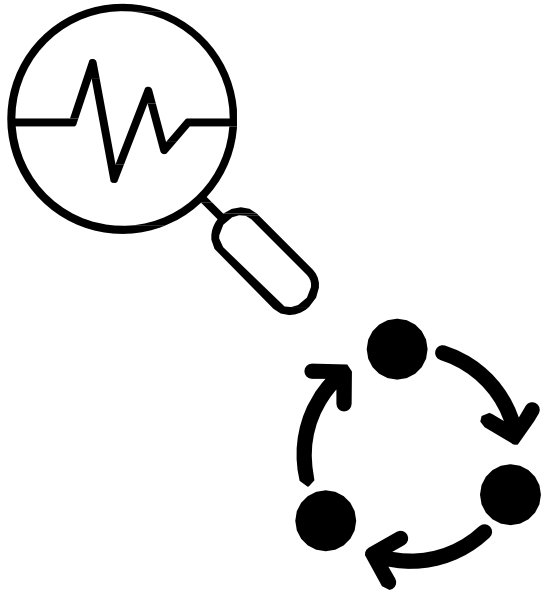
Goals:

- **Maintain coverage** for those that remain eligible
- **Minimize paperwork** burden for beneficiaries, clinicians, caseworkers



Process:

- Leverage **existing data** sources to the extent possible
- Utilize a **continuous improvement framework** with rapid-cycle innovation methods to evaluate and improve our approach in year one



Impact and Risk of H.R. 1

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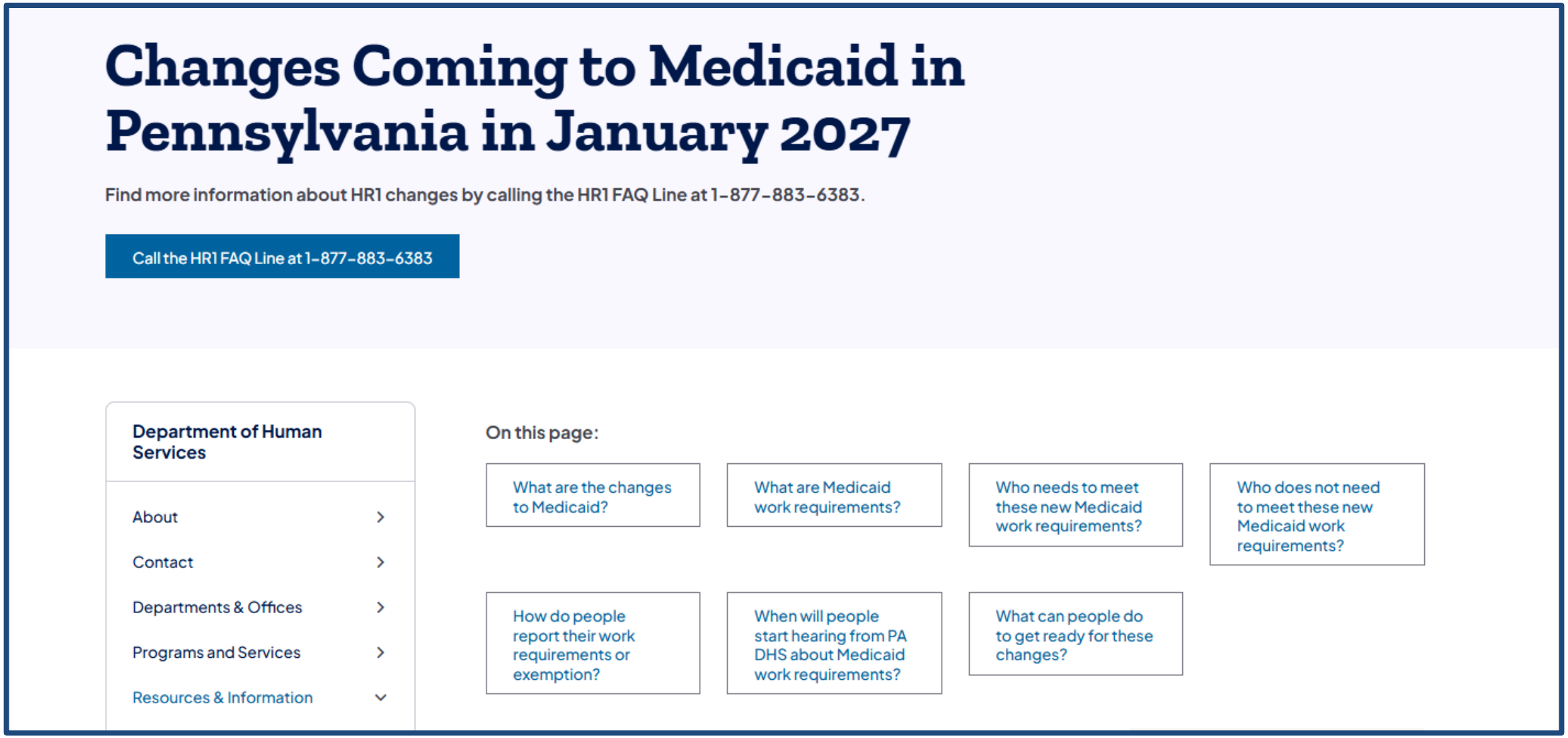
To date, approximately **89,000 Pennsylvanians have lost SNAP benefits** since September 1, 2025.

These are unprecedented changes for our Medicaid recipients, DHS is concerned that **310,000 Pennsylvanians** could lose their health care coverage because of these changes.

Our concern is not that people will lose coverage because they're not eligible, but because more hurdles are being put in their way.

Helpful Resources

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Changes Coming to Medicaid in Pennsylvania in January 2027

Find more information about HR1 changes by calling the HR1 FAQ Line at 1-877-883-6383.

Call the HR1 FAQ Line at 1-877-883-6383

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On this page:

- What are the changes to Medicaid?
- What are Medicaid work requirements?
- Who needs to meet these new Medicaid work requirements?
- Who does not need to meet these new Medicaid work requirements?
- How do people report their work requirements or exemption?
- When will people start hearing from PA DHS about Medicaid work requirements?
- What can people do to get ready for these changes?

Helpful Resources (cont.)

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- Visit www.dhs.pa.gov/medicaidchanges for a media toolkit including:
  - Sample newsletter messages
  - Social media posts and graphics
  - Print flyers
  - Examples of client outreach texts
  - FAQ on upcoming changes
  - Screener, videos, and more coming soon!
- As additional materials, notices, and direct outreach is finalized, copies will be available on PA DHS' website
- Limitations on paid marketing require assistance from community – what kind of materials will be helpful to each of you? Think platforms, print vs. digital, etc.
- Email suggestions & needs to ra-pwdhspressoffice@pa.gov

Helpful Resources (cont.2)

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Share resources with your community

- Websites:
  - www.dhs.pa.gov/FederalCuts - Details all H.R. 1 changes
  - www.dhs.pa.gov/MedicaidChanges - Details Medicaid work requirements & six-month renewals
  - www.dhs.pa.gov/Work - Details SNAP work requirements
  - www.dhs.pa.gov/Data - Medicaid and SNAP enrollment data
- Call the H.R. 1 FAQ helpline at 1-877-883-6383
- Sign up for Human Services Helpers Substack – get regular updates about programs and services from PA DHS, including suggestions on how you can help.
  - pennsylvaniadhs.substack.com