



Office of Developmental Programs Updates

ISAC
October 20, 2026



- 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.

- 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.

- 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



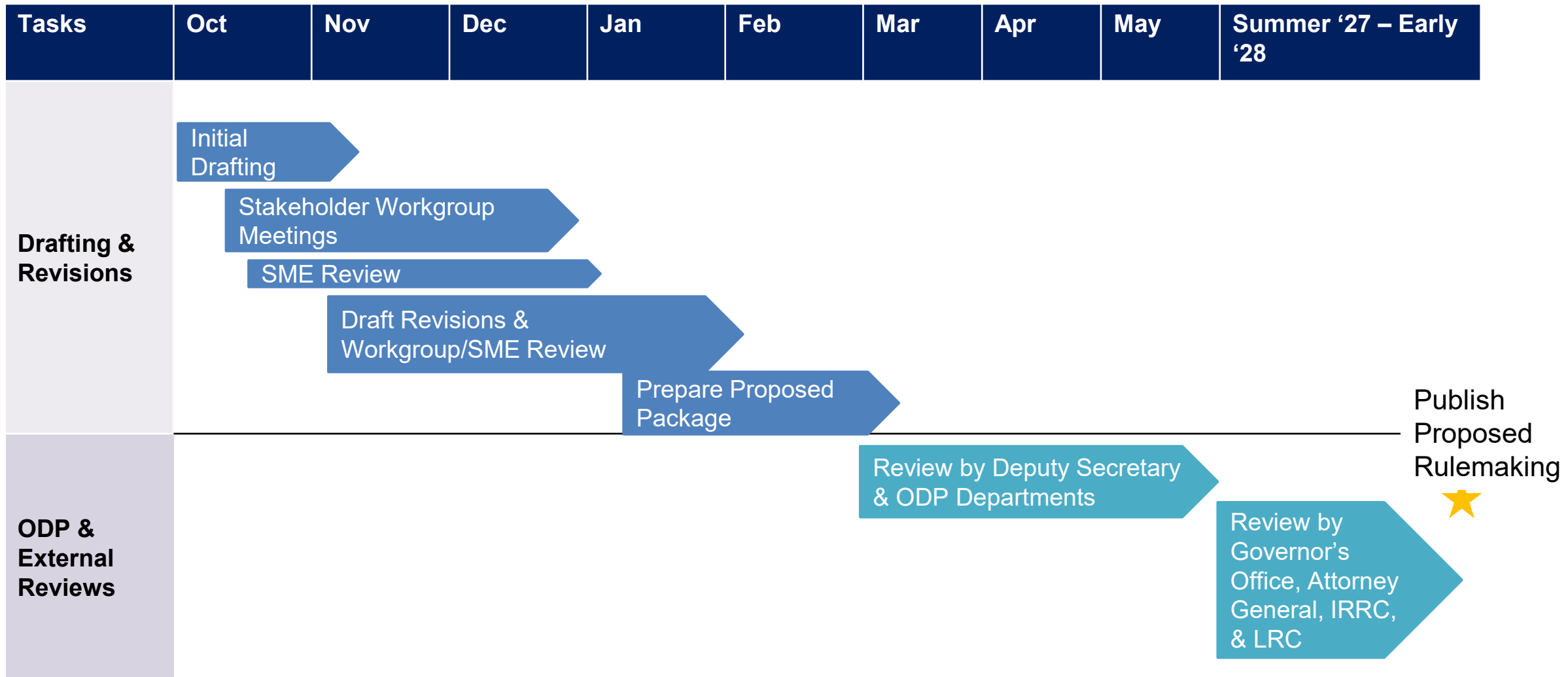
Section	Updates
55 Pa. Code § 6100.45 - Quality Management (QM)	Changes in ODP's policy and to adopt best practices, including annual review of Quality Management plans.
55 Pa. Code §§ 6100.681 – 6100.694 – Room and Board	Clarifications, including payment of board expenses when an individual is in reserved 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



pennsylvania
DEPARTMENT OF HUMAN SERVICES

Regulatory Amendment Anticipated Timeline





Pennsylvania
Department of Human Services

Federal

Access Rule: Compensation Reporting



Pennsylvania
Department of Human Services

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



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



Pennsylvania
Department of Human Services

- 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

The screenshot shows a document titled "Keep Your Medicaid" with the subtitle "A Helpful Guide for ODP Participants". It is from the Pennsylvania Department of Human Services. The document is divided into several sections:

- Don't Miss Your Medicaid Renewal**: Includes a section "Look for the PINK Envelope!" explaining that participants must complete renewal paperwork and submit it to the County Assistance Office (CAO) to maintain coverage. It mentions a "large PINK envelope" in the mail.
- Submit Your Renewal**: Lists three methods: via COMPASS, by mail, or in-person to the CAO.
- Preparing for Medicaid Renewals**: Includes "Sign up for COMPASS" (create account, download app, sign up for text messages) and "Pay attention to communications" (respond to CAO requests, renew on time).
- Report address changes**: Lists the Customer Service Center (1-877-395-8930 or 215-560-7226), COMPASS, and the MYCOMPASS PA mobile app.
- Report language needs**: Lists the Customer Service Center, writing needs on documents, and asking for interpreters.

A purple box on the right side states: "ODP Participants MUST maintain Medicaid coverage to receive necessary medical, behavioral and ODP services."

A blue box at the bottom says: "Be Aware of Your Renewal Date(s)!"

ODP Communications:

Why Use COMPASS?

- 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](#)



Pennsylvania
Department of Human Services

Why Use COMPASS?

A Helpful Guide for Office of Developmental Programs (ODP) Participants



What is COMPASS?

COMPASS is a single access point for benefits including:

- Medicaid
- Supplemental Nutrition Assistance Program (SNAP)
- Cash Assistance
- Low-Income Home Energy Assistance Program (LIHEAP)

Why should I create a COMPASS account?

• Reduce Errors	• Upload documents electronically
• Save and Return Later	• Conveniently report changes
• Track application or renewal status	• Secure recordkeeping
• Available anytime, anywhere	• View Balance and past transactions
• Faster Delivery	• Available in English and Spanish

Submitting applications, renewals, and other documents online means notices are immediately available reducing delays caused by mail delivery!





Pennsylvania
Department of Human Services



PA
Commonwealth
of Pennsylvania



COMPASS
CLICK. APPLY. BENEFIT.

Upcoming H.R. 1 Changes



January 1, 2027 – Major Changes to Medicaid:

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

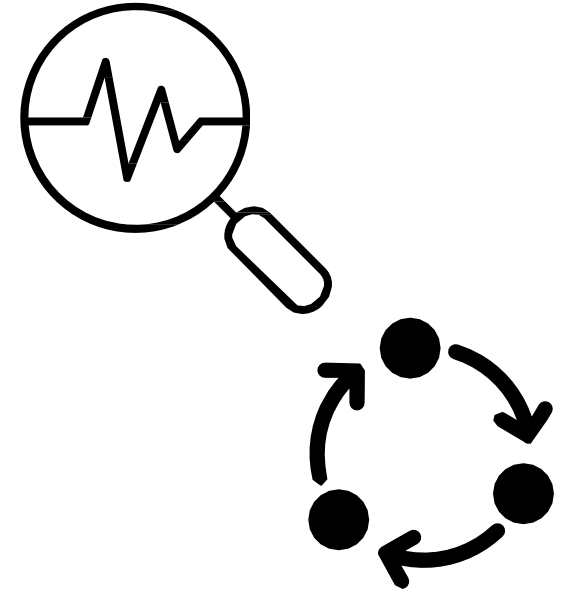


Goals:

- **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

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.

Changes Coming to Medicaid in Pennsylvania in January 2027

Find more information about HRI changes by calling the HRI 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.)



- 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)



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