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LeadingAgeOhio.org

September 17, 2025

Director Maureen Corcoran  
The Ohio Department of Medicaid  
50 West Town Street, Suite 400  
Columbus, Ohio 43215

Director Corcoran;

Thank you for the opportunity to provide comments on **ODM: ERF 219270, the Personal Needs Allowance (PNA) Increase** proposed rule draft. LeadingAge Ohio is an association representing nearly 400 member organizations serving older Ohioans across the buckeye state. These include affordable and market rate senior housing, life plan communities, nursing homes, assisted Living, home health, hospice, and palliative care, as well as adult day services.

LeadingAge Ohio strongly supports the increase to Ohio's personal needs allowance and spoke to it in testimony before House and Senate committees the budget process. We are grateful that the Administration recognized the impact of rising inflation on individuals residing in long-term care settings, and the importance of increasing the PNA to keep pace with these higher costs. Ohio's personal needs allowance is used for small purchases that greatly enhance dignity of individuals, including haircuts and stylings, going out to dinner with a loved one, buying new clothes that suit their preferences or purchasing a new phone or device that helps them stay connected with loved ones.

Increasing the PNA is one of the most broad and impactful changes that was included in the SFY 2026-2027 budget, as it channels funds directly to individuals and will have an immediate impact on their quality of life.

That said, we do have one concern related to the rule, which is that it only applies to non-MAGI individuals residing in a medical institution, and not those that reside in community-based care settings, like assisted living. To the extent possible, we believe it is important to have parity across Medicaid long-term care settings, and it does not make sense to increase the PNA for one portion of the long-term care population and not another.

It is for this reason that LeadingAge Ohio encourages the Department to amend the rule to reflect that the new PNA level also apply to individuals residing in assisted living facilities. Assisted living residents have experienced similar increases in costs resulting from inflation as nursing home residents, and they wish to have similar access to incidental purchases, just like their counterparts.

Furthermore, we believe that just as the state has budgeted for the increase in the personal needs allowance for nursing facility residents, so too it should the Medicaid program be responsible for covering the cost of the increased PNA for those residing in assisted living. That is, we request the state not "pass the buck" to providers by decreasing the amount for the room & board paid to assisted living providers.

We appreciate your incorporating these changes into the rule and look forward to continued discussion and partnership.

Kind regards,

A handwritten signature in black ink, appearing to read "Susan V. Wallace". The signature is fluid and cursive, with a long horizontal stroke at the end.

Susan V. Wallace

President/CEO