

#115 URGENT – NOW-COMP Disability Waivers – Public Comment Needed for Rates

Dearest Advocates:

As many of you are aware, a few weeks ago we became aware of some proposed rate changes for the NOW/COMP Home and Community Based Disability Waivers and because of **YOU** speaking up and stating your concerns....the Dept of Community Health (who is responsible for the Medicaid) is now having a public comment period where you can either go the meeting on April 27, 2011 (see below for details) or can have your concerns **MAILED** into them by **April 29, 2011** to **Board of Community Health, Post Office Box 1966, Atlanta, Georgia 30303**.

For all the past information and the actual presentation with proposed rates, please go to my website at <http://www.heidijmoore.com/newsletter/index.asp> (Issue #112 and 113).

DCH's public notice and current rates can be found at:

http://dch.georgia.gov/vgn/images/portal/cit_1210/13/57/170284434PublicNotice-NOWCOMPRates040811.pdf

PLEASE take a minute a write a letter to DCH (if you can't attend) letting them know about your concerns. We need to unite our voices to make sure individuals with disabilities and their caregivers are represented and properly cared for under these waivers! There is good news and bad news with the proposal but unfortunately it does look like families who choose to go self directed are affected the most by some of the rates.

Here are just some of the concerns that I have heard and need to be voiced (there are many more but this is just a sample):

Communication with families. Unfortunately, how this entire process has been handled is not acceptable. There needs to be a better system for families to know what is going on and what changes are being considered to allow us fair representation of issues. One solution is to have the Support Coordinators be responsible for making sure ALL families know of these changes and how to get involved. It is not acceptable for DCH and DBHDD to just post on their website about these changes and have the responsibility for families to check it often to see. As parents, we are too busy taking care of our individual with disabilities to check a website and see what is going on....

Communication in general. Even for this public comment, DCH did not allow for families to submit their concerns via e-mail – only via postal mail. This is not fair. They post their notice electronically so they should be able to accept comments electronically!

Families should be considered “**Stakeholders**” in the process. Based on the study, it looks like they **ONLY** took providers input into account and **NOT** families who are self directed with the NOW/COMP waivers.

Reduction in Community Access Individual & Behavioral Consultation Rates: Unfortunately, many of the proposed rates are a reduction and we are already having difficulty finding providers now. Specifically, Community Access Individual (which a lot of our families who are self directed have issues with finding providers that accept the low rate now) is proposed to be reduced by 4%. How can families that are self directed think “outside of the box” for supports and services when the rates are so low? In addition, Behavioral Supports consultation is proposed to be reduced by 11.9%!

SIS – Tiered Based Rates: Several services have been proposed to be a “tiered based” on consumers Supports Intensity Scale (SIS) levels. How is this going to be administrated based on children under the age of 16 yrs who don’t have a SIS? Families have NEVER been told what their tier is and what it means. Clearer definition is needed BEFORE this is considered as a rate model. In addition, the SIS system needs to be revisited. The scores that were determined two years ago are subjective and many who where performing the interview where not trained properly. SIS scores are subjective and inconsistent and based on a funding algorithm that has never been explained to everyone involved. How can this been the final method for developing rates when there is no consistency to the process of developing those scores?

How does **Person Centered Planning** come into the process? Based on the SIS, this is not looking at truly what the person needs in order to accomplish their dreams and skill sets.

Support Coordination rate was determined to be “hold harmless” at \$149.88 (remain the same). How can a category not be reviewed in the study? Especially when those services that directly impact families are being reduced? Doesn’t seem fair!

Positive note about rate study and proposed changes:

1. **Community Living Supports Individual** are being proposed to increase by 18.7% and respite overnight increased of 98%- this is a long time over due! Who is going to watch our children with disabilities overnight for \$98/night? This is a positive step for both of these areas.

Below is the actual public notice by DCH and specific information on where to send your comments and/or attend the public hearing.

Please get involved or you have no right to complain about not being able to find good providers due to low rates! You have only one week to submit your comments via mail.

In addition, please send your letter that you mail to DCH to the following e-mail addresses:

Beverly Rollins, GDBHDD Executive Director of Developmental Disabilities
bdrollins@dhr.state.ga.us

Frank Shelp Commissioner of GA DBHDD FESHELP@dhr.state.ga.us

Jerry Dubberly, Chief Medicaid Division for DCH jdubberly@dch.ga.gov

Donald Cole, Chairman of the DBHDD Board of Directors Donald.cole@rttassociates.com

Include in your letter the following information:

Indicate if you are a family member and what your child's diagnosis is.

Indicate if your child is currently receiving NOW or COMP waiver services or will require these services in the future

Indicate what you would do if your service provider closed or if you are having problems finding providers under the current rates.

Unfortunately, I will not be able to make the public hearing next week. Jacob has chemotherapy at the hospital but I will be submitting my concerns in writing

United – We Will Make A Difference!

Heidi J. Moore

(Proud Mother to Jacob - 11 years old with Down syndrome & Leukemia and Jared - 9 years old)

PUBLIC NOTICE

Pursuant to 42 C.F.R. § 447.205, the [Georgia Department of Community Health](#) is required to give public notice of any significant proposed change in its methods and standards for setting payment rates for services.

DEVELOPMENTAL DISABILITIES WAIVER PROGRAMS

The two waiver programs for people with developmental disabilities, the New Options Waiver Program (NOW) and the Comprehensive Supports Waiver Program (COMP), began operations on November 1, 2008 under a configuration of new services and rates created by unbundling services that had been delivered previously on a per diem or monthly basis. The unbundling of the service was supported by CMS and continues to be supported through waiver amendment and renewal approvals. The NOW and COMP Programs' current rates are attached to this public notice.

The purpose of this notice is to establish maximum rates for services provided under the NOW and COMP Waiver Programs. This public notice is available for review at each county Department of Family and Children Services office. **An opportunity for public comment will be held on April 27, 2011, 1:00 p.m., at the Department of Community Health, 2 Peachtree Street, N.W., Atlanta, Georgia 30303,**

in the Fifth Floor Board Room. Individuals who are disabled and need assistance to participate during this meeting should call (404) 656-4479.

Citizens wishing to comment in writing on any of the proposed changes should do so on or before April 29, 2011, to the **Board of Community Health, Post Office Box 1966, Atlanta, Georgia 30303**. Comments submitted will be available for review by the public at the Department of Community Health, Monday - Friday, 9:00 a.m. to 4:30 p.m., in Room 4053, 2 Peachtree Street, N.W. Atlanta, Georgia 30303.

Comments from written and public testimony will be summarized and provided to the Board of Community Health prior to the May 12, 2011 Board meeting at 10:30 a.m. at the Department of Community Health, 2 Peachtree Street, N.W., Atlanta, Georgia 30303, in the Fifth Floor Board Room.

NOTICE IS HEREBY GIVEN THIS 14th DAY OF April, 2011
David A. Cook, Commissioner

If you would like to receive Jacob Moore's updates or post a prayers, please go to:
<http://www.caringbridge.org/visit/prayforjacobmoore> or www.teamjacob.org. To make a donation in Jacob's honor for childhood cancer research, please go to:
<http://www.active.com/donate/jumpingforjacob>. To watch Jacob's Cancer Journey video:
www.youtube.com/watch?v=2GjPfmIZ76g

For disability information and previous newsletters, please go to www.heidijmoore.com .

"Help The Children Now, So They Can Help Themselves Later!"

The material contained in this e-mail is for general information only. It is not intended in any way to provide or offer legal advice. To obtain legal advice please consult with your attorney or a qualified legal representative.

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