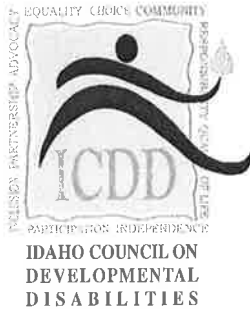


SENATE HEALTH & WELFARE COMMITTEE  
Monday, January 25, 2016

ATTACHMENT 1



700 W. State St.  
JRW Building  
First Floor West  
Boise, ID 83702-5868  
Phone: 208-334-2178  
1-800-544-2433  
Fax: 208-334-3417

C. L. "Butch" Otter  
Governor

Debra Parsons  
Chair

Christine Pisani  
Executive Director

January 25, 2016

Senator Heider, Chairman  
Health and Welfare Committee  
Statehouse  
Boise, ID 83720

**RE: DOCKET NO. 16-0310-1501**

Dear Senator Heider and Committee Members:

The Council on Developmental Disabilities is authorized by federal and state law to monitor systems and policies and to advocate for improved and enhanced services that enable Idahoans with developmental disabilities to live meaningful lives, included in their communities. The Council is comprised of 23 volunteers appointed by the Governor.

The Idaho Council on Developmental Disabilities is in support of this rules docket. The Federal Centers for Medicaid and Medicare (CMS) Home and Community Based Services (HCBS) Rule aligns with the mission and values of the Council. The implementation of this rule supports:

- Enhanced quality in Home and Community Based Services
- Improved quality assurance features for individuals receiving services and supports through Medicaid's HCBS programs
- Full access of individuals to the benefits of community living
- Individuals receiving services in the most integrated setting

Since the passage of these rules at the Federal level in March 2014, the Council worked collaboratively with the Department in the following ways:

- Provided user-friendly language to interpret the rules for people with disabilities and families in Idaho
- Participated in joint meetings with the Division of Medicaid to provide input into the (CMS) Home and Community Based Service Rules
- Provided public comment to both published CMS HCBS Rules State Transition Plans.
- Conducted a focus group with adults with developmental disabilities to learn their specific recommendations on how to improve the quality of person centered planning.

However, our largest investment in the implementation of these rules has been the statewide face to face study currently underway with the Center on Disabilities and Human Development at the University of Idaho.

This statewide study was created to reflect the diverse range of support needs of all participants in the Developmental Disability waiver, an HCBS program. This study intends to establish a baseline of what the service system looks like now through the eyes of adults with developmental disabilities when asked about integration, choice, control, and privacy through HCBS services. The Council and CDHD piloted interview questions and initiated the interview process with 20 participants interviewed in north Idaho (Region 1) and 18 participants in north central Idaho (Region 2). Interviews are currently being conducted in southwestern Idaho (Region 3). The baseline of this initial study will be provided to the Division of Medicaid for use in evaluating service provider compliance within the first year of implementation of the HCBS rules. A follow-up study is intended to take place with the same DD waiver participants in 2019 to provide a comparison between pre and post implementation of the HCBS rules.

The Council believes that the Department should identify face-to-face statewide training as a long-term investment in the service system and the lives it is intended to support. The Council recommends a comprehensive approach to the many components of necessary face-to-face training for meaningful compliance with the rules for service providers. More importantly, face-to-face education is needed for individuals and families to learn about the rules and ways in which they may exercise choice, control, and have the support needed to lead lives of their choosing. As part of this training, the Council strongly emphasizes teaching individuals and families about their rights under Medicaid rules.

Thank you for considering the comments of the Idaho Council on Developmental Disabilities. The Council supports implementation of these rules to ensure true community integration be realized by Idahoans living in HCBS settings.

Respectfully Submitted,

Christine Pisani  
Executive Director