



Maryland Developmental Disabilities Council

EMPOWERMENT • OPPORTUNITY • INCLUSION

December 11, 2017

Bernie Simons, Deputy Secretary
Developmental Disabilities Administration
201 West Preston Street- 4th Floor
Baltimore, MD 21201

Re: Community Pathways Waiver federal application

Dear Mr. Simons:

The Maryland Developmental Disabilities Council (Council) submits the following feedback and recommendations regarding the Developmental Disabilities Administration's Community Pathways Waiver application to the Centers for Medicare and Medicaid Services (CMS). The Council appreciates that numerous changes have been made that reflect previous recommendations about the service definitions. Thank you for the opportunity to comment on the waiver application.

EMPLOYMENT SERVICES & SUPPORTED EMPLOYMENT

Recommendation 1: Add language to clarify the definition of On-going Job Supports within Employment Services compared to Supported Employment activities and services. It needs to be clear that while On-going Job Supports are only available when people start a new job, get promoted, or change positions or circumstances, Supported Employment includes, and will continue to include ongoing support to keep a job (when merged with Employment Services in July 2019).

Recommendation 2: The Council continues to advocate and recommend the revision of the requirements for staff to allow demonstrated competencies associated with the outcomes for each services instead of requiring certain certificates.

COMMUNITY DEVELOPMENT SERVICES & DAY HABILITATION

Recommendation 3: Add language from earlier versions of the service definitions so it is clear that the following are acceptable activities in both CDS and Day Habilitation: "meeting new people, making friends, and going to classes or activities for fun, fitness, or to learn."

SELF-DIRECTED SERVICES

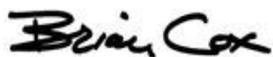
Recommendations 4: We understand that individuals who wish to self-direct some services must self-direct all of their services. We recommend that this policy be reconsidered to determine if a reasonable implementation policy could be designed that would allow individuals to self-direct some services while utilizing a traditional model for others. In particular, an individual whose needs are predominately met through the purchase of Goods and Services only has the option to self-direct. They, therefore, must self-direct all services they receive or forego the goods and services they most need. They may not have the time or ability to self-direct these other services, which could be much more involved than self-directing just goods and services. If this change is not made, we urge DDA to monitor the transformation to the new service configuration to determine any negative impact due to this type of scenario and the need for a modification to the policy to appropriately and cost-effectively accommodate all service plans that include goods and services.

INDIVIDUAL & FAMILY DIRECTED GOODS & SERVICES

Recommendation 5: The Council is pleased that the cap on Individual & Family Directed Goods & Services was raised from \$2000 to \$5500. We again recommend DDA allow the amount be higher if pre-authorized by DDA and justified in the individual's plan. Some individuals and families have for years received goods and services that total more than \$5500 through Family Support Services and Individual Support Services. For some of these individuals and families, the only way to continue to receive the same type and amount of DDA-approved services is through Individual & Family Directed Goods & Services; that is, none of their current supports and services will align with any other service in the new application. The result will be a loss of supports with the \$5500 cap. At a minimum, an amount above \$5500 should be allowed for those currently in services – grandfathering them in.

The Maryland Developmental Disabilities Council remains ready to support and monitor implementation of the waiver renewal to ensure the best outcomes possible for Marylanders with developmental disabilities.

Sincerely,



Brian Cox
Executive Director