



May 2, 2018

Becky Phillips
Administrative Rules Coordinator
Ohio Department of Developmental Disabilities
30 East Broad St., 12th floor
Columbus, Ohio 43215-3414

Ms. Phillips:

The Arc of Ohio thanks the Ohio Department of Developmental Disabilities (DODD) for the opportunity to provide testimony regarding the proposed rule OAC 5123-9-04 on behalf of people with intellectual and developmental disabilities, their families, friends, interested citizens and professionals in the disability field.

People with developmental disabilities and their families have repeatedly told us Ohio's waiting list for Home and Community-Based Services (HCBS) waivers is overly complex and in need of simplification. The current waiting list confuses people with developmental disabilities and their families, misleads advocates, and hinders efforts by policymakers to direct resources to where they are needed most.

To better serve Ohioans with developmental disabilities, The Arc of Ohio has been collaborating with people with developmental disabilities, family members, and organizations representing guardians, county boards, and providers for more than 17 months to modernize Ohio's Medicaid Waiver waiting list as a part of the Fix The List coalition. We believe replacing the current system will greatly improve the way Ohio's waiting list for HCBS waivers operates.

The Arc of Ohio supports the proposed changes to OAC 5123-9-04 because of the positive effects it will have for people with developmental disabilities and for the families who depend on DODD and local county boards of developmental disabilities for support.

The requirement that Service and Support Administrators (SSA) must have a conversation with people with developmental disabilities and their families to discuss their needs is a welcome change from the current waiting list system. These conversations will allow people with developmental disabilities and their families to express their service and support needs in a timely manner and give their SSA the opportunity to either find a service that will address their need that may have been previously unknown to the local county board of developmental disabilities or place them on the waiting list based on their need for waiver services. These conversations are crucial to the success of this new process. Ample time should be given to educate and train SSAs so they may accurately and efficiently administer the assessment for people with developmental disabilities and their families across the state.

A clear order of waiver enrollment from the waiting list is very important to people with developmental disabilities and their families. This rule outlines a statewide order of waiver enrollment which will ensure those

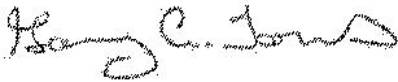
with the most needs are prioritized to receive the services and supports they need from a waiver. It also requires that county boards of developmental disabilities identify how many people they plan to enroll in each type of locally-funded HCBS waivers and make that plan available to anyone who wishes to have it. The new order of enrollment and the publicly available plan from county boards of developmental disabilities will increase the trust in the waiver enrollment process that is currently unclear and too complex for most people to understand.

The new process will individually recognize those who have an unmet need for waiver services through a uniform statewide use of the Waiting List Assessment Tool. The same tool will be used to assess needs across county lines to ensure consistency throughout the state. Because of the uniformity and clarity introduced by this rule, we believe these changes will improve the waiver enrollment process and lead to a more efficient use of resources to provide services for people who need them.

This new waiting list for HCBS waiver services that will identify people who have a current need for services and match those people to resources that will meet their unique assessed need(s) is necessary. This will allow DODD and local county boards of developmental disabilities to more effectively plan to meet current and future needs of people with developmental disabilities as well as their families.

Through the efforts of the coalition and informed by the feedback of people with developmental disabilities and their families, we believe that a new approach to the way Ohio's HCBS waiver waiting list operates is needed. This rule addresses our concerns and provides a solution to the complexity and confusion of our current waiting list system. The Arc of Ohio offers our full support for the adoption of this rule: OAC 5123-9-04.

Thank you for your time and the consideration of these comments.



Gary Tonks, CEO
The Arc of Ohio