



July 13, 2017

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

Ms. Phillips:

On behalf of the people with intellectual and developmental disabilities, their families, friends, interested citizens and professionals in the disability field whom we represent, The Arc of Ohio thanks the Ohio Department of Developmental Disabilities (DODD) for the opportunity to provide testimony regarding the proposed rules OAC 5123:2-9-23, 5123:2-9-30 and 5123:2-9-33.

The Arc of Ohio supports the proposed changes to the rules referenced above because of the positive impact they will have for the people who receive the services referenced in these rules and for the families who depend on DODD and local county boards of developmental disabilities for support.

5123:2-9-23 Increased Environmental Accessibility Adaptations Limit

Increasing the IO Waiver Environmental Accessibility Adaptation payment limit to \$10,000 per project increases the types of accessibility projects that will be available to the people who need modifications made to their living environment to stay in the community, in the residence of their choice. Families will be able to better care for their loved one in an accessible environment without further jeopardizing their financial stability. More service options will become available to families as more providers of this service will be enticed into the market with an increased limit amount to fund multiple project types that were not previously available under the previous budget limitation.

5123:2-9-30 Complex Care Rate Modification

In many cases, Ohioans with complex care needs are currently unable to retain the service of providers due to the extreme physical demands of their care and low reimbursement rates for this service. DODD's proposed Complex Care Add-On rate to the Homemaker Personal Care service rate will give independent and agency providers of this service an increased incentive to continue providing the complex supports and services people need as well as give families the increased training and stability of direct support professionals they desperately require for the support of their loved ones with complex care needs. As this new rate brings more options and stability to those who meet all the criteria listed in (F)(5)(a), our request is that DODD consider how the same options and stability could be extended to those who may not meet all the listed criteria, but still have the complex care needs which require an increased reimbursement rate to incentivize the providers of this service to continue.

5123:2-9-33 Shared Living

The new Shared Living service, with the increased rates for both related and unrelated providers of service, will attract more service options for people who may be looking for an alternative to the traditional service delivery of Homemaker Personal Care within the IO Waiver. Shared Living is expected to provide a stable living environment for those who choose it as a part of the rhythm of life which tends to naturally occur when people live together in the same home and is being explored more and more by families throughout the state. The introduction of the Shared Living Rule, which replaces Adult Family Living and Adult Foster Care, not only simplifies these two similar service categories into one service, but it also sets the reimbursement rate families are paid for this service equal to that of unrelated caregivers which will begin to move Ohio's system away from the antiquated idea that families with adult children should be expected



to do the same work with the same qualifications at a lower reimbursement rate. While this new service and corresponding reimbursement rates are a move in the right direction, The Arc of Ohio encourages DODD to examine how the results of the Ohio Developmental Disabilities Profile (ODDP) places families in lower funding ranges and creates a predisposed unfairness for families who are caring for their loved ones in their homes. Because the ODDP is the foundation on which IO Waiver funding is determined, the built-in bias against families caring for their adult children must be removed for families to truly be on an equal level as unrelated providers of the same service.

We thank DODD for their continued willingness to listen to the concerns of Ohioans with intellectual and developmental disabilities as well as their families. We believe the thoughtful and purposeful rules referenced above will move Ohio's services in the direction of addressing those concerns and providing more support options for those who need them.

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

A handwritten signature in black ink, appearing to read "S Beha".

Steve Beha
The Arc of Ohio
Associate Director