



November 27, 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 5123:2-9-24, 5123:2-9-32, 5123:2-9-37 and 5123:2-9-40.

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.

5123:2-9-24 Transportation

Including the same transportation service in the Self Empowered Life Funding (SELF) Waiver as is already available in the Individual Options (IO) and Level 1 Waivers simplifies the services provided in the three waivers and reduces the complexity that many people and families experience when making service and support decisions. Aligning this service in all three waivers is also a positive move towards combining Ohio's waivers into a less complicated and more straightforward system which is fully supported by people with intellectual and developmental disabilities and their families.

5123:2-9-32 Participant-Directed Homemaker/Personal Care (HPC)

The addition of Participant-Directed HPC in the IO and Level 1 Waivers as well as the SELF Waiver gives people with intellectual and developmental disabilities as well as their families the ability to choose the person they wish to provide their services and have more direct control over what those services entail. The Agency with Choice service within the SELF Waiver will provide people with more options for the co-employer model and the Common Law service within the IO and Level 1 Waivers will allow for more autonomy and self-determination to be exerted in this service category and will also more closely align these waivers with the SELF Waiver which reduces the complexity of the systems and services people rely on for their health and safety. We look forward to opportunities Participant-Directed HPC will provide those who wish to access it.

5123:2-9-37 Waiver Nursing Delegation

The creation of a reimbursable Nursing Delegation service within the Level 1, SELF and IO Waivers will be an incentive for more willing and able providers to serve the people who rely on Nursing Delegation to provide for their health needs. Currently, people with intellectual and developmental disabilities or their families struggle to find providers of this mandated service without a system to pay the provider for this function. This new rule and payment system will help to alleviate that issue and give the people who need Nursing Delegation to meet their needs more options for their services.

5123:2-9-40 SELF Waiver Administration

The addition of Participant-Directed HPC, Transportation, and Waiver Nursing Delegation to the services available in the SELF Waiver, again, aligns services in all three waivers and is a positive move towards combining Ohio's waivers into a



less complicated and more straightforward system which is fully supported by people with intellectual and developmental disabilities and their families. Please see our comments above regarding each individual service.

We sincerely 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