



STATE OF TENNESSEE
COUNCIL on DEVELOPMENTAL DISABILITIES
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August 4, 2015

Patti Killingsworth
Assistant Commissioner
Bureau of TennCare, Long-Term Services and Supports
310 Great Circle Rd.
Nashville, TN 37243

Dear Patti:

Please accept these comments from the Council on Developmental Disabilities in response to Amendment 27 to the TennCare 1115 Waiver.

We enthusiastically support Amendment 27. The level of best practice, vision and leadership in moving Tennessee's Intellectual & Developmental Disabilities service system forward is apparent in the proposal.

The Council joins The Arc Tennessee and Disability Rights Tennessee in suggesting the following changes to Amendment 27:

- Update concepts around community transportation, assuring that current options like Uber, cabs and even helping friends with gas costs are options used by people with disabilities and are reimbursed services under the ECF CHOICES Waiver. **(Att. G, pg. 15)**
- Update concepts around use of assistive technology to encourage use of current day devices such as smart phones and iPads. Dozens of apps, including day schedulers, meal planning, maps, and other support programs can be tailored to an individual's support needs. These devices have been highly successful in increasing independence in students attending postsecondary education programs in Tennessee. **(Att. G, pg. 17)**

The Council offers the following additional suggestions:

- Require MCO's to **develop policies and procedures for serving people with limited communication**. The purpose of the recommendation is to advance knowledge and practice in assuring that person centered services and systems are successful to the greatest extent possible when serving individuals who don't speak, are limited in expressing themselves and participating in planning their services. The goal is to challenge ourselves and our service system to learn more about the science of receptive and expressive

language, take the time necessary to learn about each individual's communication tools. Typically we depend on a family member or personal assistant to speak for a person who doesn't speak themselves. If we are willing to take time and to understand each individual's communication skills, we might unlock new levels of communication that will advance our goals for a person centered system. **(Part 1, pg. 10: Person Centered Planning)**

- **Form a technical assistance task force on ECF CHOICES employment services** to develop implementation procedures, identify and problem solve issues, and to review data and evaluate success of the program. **(Att. G, pg. 1: Essential Supports for Employment)**
- **Establish incentives for MCOs to certify their staff as person-centered trainers.** The Council will work with TennCare and DIDD to provide intensive person-centered organization training and certification through SDA Associates. In order to understand and embrace person-centered principles and deliver person-centered services to customers, MCOs should adopt person centered principles from top to bottom within their organization. New managed care organization regulations from CMS require that person-centered practices be adopted to support new CMS settings rules. Tennessee should go beyond requiring person-centered training for MCOs and support the organizations to become person-centered organizations with their own cadre of trainers to train their staff, provider staff, and customers as well. Partnerships between MCOs and the Dept. of Intellectual & Developmental Disabilities' certified person centered trainers will strengthen our system overall. **(Part 1, pg. 10: Person Centered Planning)**
- **Formalize a Wait List system.** Perhaps a task force could be formed to oversee design and evaluation of a unified wait list system. The wait list system would be organized around specific criteria (age, caregiver situation, and other relevant criteria). The task force could meet biannually to review an analysis and report about wait list members, and any progress on the member's situation. Include a plan within enrollment caps that would ensure equitable enrollment of people with intellectual disabilities from the wait list and individuals with developmental disabilities who have access to services for the first time. The purpose of the recommendation is to further carry out requirements in Title 33 to plan for the needs of citizens with intellectual and developmental disabilities by being aware of and reviewing the status of citizens who have applied for assistance. **(Part 1, page 12: Enrollment Targets and Wait List)**
- **Require training on Supported Decision-Making,** with the expectation that this support is available to all members and is utilized in person centered planning processes. Care Coordinators could receive training on supported decision making through the National Resource Center for Supported Decision-Making. Supported decision-making is a new concept and alternative to conservatorship for seniors and people with disabilities. This approach allows people to use trusted friends, family members, and professionals to help them understand the situations and choices they face. People are supported in making daily life choices about where they live and who they interact with, their finances, and their health care. When staff are trained in how to facilitate Supported Decision-Making, people are enabled to make their own decisions as often as possible. **(Att. G, pg. 23: Conservatorship Counseling)**
- **Develop a 'No Wrong Door' model for Program Administration and Operation.** With the DIDD Regional Offices serving as entry points for the ECF CHOICES program, Tennessee has

an excellent opportunity to develop and test the much discussed 'no wrong door' approach, including the use of a virtual portal. Entry should be customer friendly, easy to understand and maneuver, and continually evaluated for improvement. **(Part 1, pg. 4: Program Administration)**

- **Develop a memorandum of understanding with the Dept. of Education** that lays out a process for providing employment services for students when they turn 18 years of age. Many students with intellectual and developmental disabilities choose to leave public school at age 18 to pursue postsecondary programs, including employment training, rather than remain in school through age 22 as provided through IDEIA. An interagency process to provide a smooth transition, coordinating services as best we can, would be a great benefit to individuals with developmental disabilities and their families and make the best use of resources. **(Part 1, page 4: Eligibility)**
- **Add Assistive Technology Services** to the section on Assistive Technology, Adaptive Equipment and Supplies, to include instruction in the use and maintenance of the specific technology, equipment and supply. Consider requiring a 6 month or at least annual review of the successful use of the assistive technology, equipment or supply to make sure that it is working properly and that it is a benefit to the individual. **(Att. G, pg. 17: Assistive Technology)**
- **Require MCO's to develop a communication plan for keeping members in the ECF CHOICES program informed.** Individuals and families who receive services express frustration at not understanding the service system that supports them and not being informed about changes. Communication should occur frequently, utilize multiple modes of communication, be free of technical language, acronyms, etc., and should go to great lengths to enhance awareness of the people receiving services or those seeking services. **(Part 1, pg. 4: Program Administration)**
- **Establish a 'think tank' for the Essential Family Supports program** to evaluate and align services and practices of the program with concepts of the national Supporting Families Initiative. Tennessee is one of 5 states participating in the systems change Community of Practice for changing how we support families who have a family member with a developmental disability. Specific "LifeCourse" planning tools and training are available to help support families. Use of these resources further advances our goal of a person centered system. **(Part 1, pg. 9: Essential Family Supports)**

Further comments:

- **Enrollment targets.** We support prioritizing enrollment for "young adults transitioning from school into integrated, competitive employment." As mentioned in response to the Concept Paper, it is critical for Tennessee to take a policy stand and provide postsecondary services to students when they leave high school. This helps students immediately put to use and build upon skills gained during school years and helps moderate the growing waiting list. The Council appreciates the mention of Project SEARCH graduates. Project SEARCH is providing the greatest employment outcomes to high school seniors in Tennessee and across the country. Schools are embracing the model but there is reluctance to move forward too aggressively if students don't have some source of support in place. We need to support the expansion of Project SEARCH across the state. **(Part 1, page 12)**

- **Participant Safeguards.** We strongly support the intent to build upon the State's protection from harm system, particularly the proposal to develop a process for data analysis to identify systemic issues that can be addressed to make our programs safer and offer more support to staff in carrying out their responsibilities. **(Part 1, pg. 14)**

Thanks so much for providing ample opportunity for everyone to review and comment on Amendment 27. I look forward to continuing discussions and working with TennCare on the implementation of the ECF CHOICES program.

Sincerely,

A handwritten signature in cursive script that reads "Wanda Willis".

Wanda Willis
Executive Director