

Service Provider (other than DSP)	No page number provided
I don't think people should have to leave their home in order for providers to bill. In home should be available. I know that no one is forcing consumers to leave their home. But the fact is, the residential rates providers are paid were never intended to cover for a 24 hour period. That is not how it works. If a person wants to retire and not ever leave their house, they should have that option and providers should not be penalized for it. We are penalized now if a person refuses or wishes to remain in the home all day. This practice does not achieve more choice and rights for people. It simply is not fair to the provider. Some providers will take a loss rather than insist a person get out for 2 hours. That is a commendable ethic. Some providers however will force the issue to get the person out so that they can bill. People should have the dignity of choice and not be told that they should leave. Providers should not be forced to take less funding because of this choice. Back up, take another look at it. Community connections are useful and admirable. But riding around for 2 hours to justify billing is what you are creating.	
Thank you for your comment. Changes to the Homebound supports are not part of these amendments, but we will take your feedback into consideration for any future changes.	
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Regarding the flexible provider rate. There was not enough detail about it to actual comment about it. It appreciated that the state understands we will have to be creative in solving the workforce problem. But it is being rushed through. Advocates, providers and especially people in supports and their families have no idea what DIDD is planning to do. Only small pockets of providers. A pilot should have been done first. It is still not too late. Do a pilot before making it rule. Thank you.	
Thank you for your feedback. Information on the Residential Habilitation and Supported Living VBP Flex rates and incentives will be shared with providers and stakeholders as part of the implementation of the new rates. Although we encourage providers to strive to meet the flex rate and incentive outcomes by demonstrating exceptional, innovative, and person-centered service delivery, the proposed rates and incentives are not a requirement and are optional for providers based on their initiative to deliver supports in ways that align with TennCare and DIDD's system transformation values.	
Advocacy Organization	No page number provided
There should be more flexibility around the wrap-around services and/or homebound services to accommodate individual specific medical, behavioral, and/or retirement needs/desires such as allowing the service to be billable on days the individual does not/cannot get into the community without requiring a doctor's order or an extensive approval process with complex parameters. We recommend that reasonable be clarified within this statement - For Supported Employment – Individual Services-Job Coaching, fee for service job coaching rates are based on a prospective rate model that reflects a sufficient wage for the level of qualified staff required to deliver the service and all other reasonable and anticipated costs involved in providing the service.	
Thank you for your comments.	

Changes to the Intermittent Employment and Community Integration Wraparound and Homebound supports are not part of these amendments, but we will take your feedback into consideration for any future changes.

The Appendix I waiver language is intended to provide a high-level overview of the rate structure for certain services. More information on reasonable costs included in the Job Coaching service can be found in the Job Coaching service definition and limits in Appendix C.