



6-12-24

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Budget Authority Workgroup Agenda

1. Welcome

Tonya Schwerin, Melissa Frash, Angela Martin, Marie Eagle, Tayler McQuay, Courtney Trunk, Sheryl Kuenzer, Stephanie Laird, Laura Demeuse, Jill Gerrie



Angela asked us all whether we liked the warm weather or not.

2. Write Comments about the Waiver Changes

Comments below.



Date: 6/17/24

To: MDHHS/Behavioral and Physical Health and Aging Services
Administration, Program Policy Division
PO Box 30479
Lansing MI 48909-7979.
MSADraftPolicy@michigan.gov

RE: **Submissions of Renewal Applications for Children's Waiver Program (CWP), Habilitation Supports Waiver (HSW), Waiver for Children with Serious Emotional Disturbances (SEDW); Section 1915(i) State Plan Amendment (SPA), Parent Support Partner (PSP) SPA, and Targeted Case Management (TCM) SPA**

From: Self-Direction Budget Authority Workgroup Advocates

Thank you for the opportunity to comment on the above-mentioned Medicaid renewal applications.

HAB Waiver

- **Overnight Health and Safety**

Thank you for expanding the use of Overnight Health and Safety Support in all waivers and the (i) SPA.

- There is some confusion in the field about how to code this service. It would be helpful if the Department would issue a letter to CMHs with instructions.

- **Prevocational Services**

Prevocational Services should be **time limited with documentation required about people's progress**. Studies for years have shown that people learn best on the job, not by learning skills in isolation.

- **Quality Improvement Performance Measures**

- Thank you for changing site reviews from every other year to yearly for all services. It will provide better monitoring and quality.

- Thank you for including a time frame for remediation. It will be good for all CMHs/PIHPs to follow the same.

- **Goods and Services**

Thank you for the removal of the phrase "to replace human assistance."

- Thank you for including adaptive clothing.

- While Goods and Services cannot be used to pay for vacations or staff, would you please consider adding staff transportation to the vacation location? It is understood there would need to be a limit on the amount spent. Direct Care Workers and those who rely on them do not have extra money to cover staff travel.

- While we understand the **internet** is considered a utility by CMS, we beg MDHHS to **look at flexibilities used by other states**. EVV requires internet and people are using telehealth

more often. Additionally, because of the staffing crisis people are using online services to connect with family and friends because they are not able to get out. Peer support is also done through the internet, particularly in rural areas and because often transportation is an issue. The internet is also used by those receiving services to connect with and schedule their staff.

- It is understood that goods and services should not be used for tutoring or other services available through the Rehabilitation Act or IDEA. However, please direct CMHs to make sure that the person in question has not been told they don't qualify for these services. Unfortunately, it is still common for people to be told they are unemployable.
- **Please make goods and services available in the other waivers and the 1915(i) SPA.**

- **Supported Employment**

Do not limit supported employment services to 24 months in any of the waivers or the (i) SPA.

- It has always been understood that MRS pays for services initially and CMH pays for long-term supports. This is especially a problem for the HAB population which needs the most support to accommodate their disabilities as they are eligible for institutional care. Many people need lifelong ongoing or periodic support to maintain their job.
- To require a 90-day review of the plans of people who get an exception to this rule is overly punishing and burdensome.
- The above comments also apply to the fading of support. To assume people will always learn quickly to do their job does not match reality.

- **TEFRA**

Thank you for including the TEFRA population in the waiver.

- **Environmental Modifications**

Thank you for removing the phrase "finding alternative housing."

- **Assessment Tools**

Thank you for making sure that the person who does the assessment is not the person providing services in all waivers and the (i) SPA.

- **Other Items**

- The state is experiencing a Direct Care Worker crisis. Please **pay legally responsible relatives** to provide direct support in all waivers and the (i) SPA. Other states do it and it would alleviate some of the support issues people are experiencing and the problem of people not using their services (underutilization gives an inaccurate picture of a person's needs).
 - Please clarify who can get paid. There is confusion about whether back-up guardians, people with Powers of Attorney, spouses of guardians, etc. can be paid.
 - There is also confusion about who makes the decision about who can get paid. Please clarify.
- Please **wrap Home Help Services into the CLS rate**. It is done in the MiChoice Waiver and would eliminate a barrier to self-directed services.
 - Having Home Help combined with the CLS rate will improve staffing options. Right now, Home Help pays less than CLS wages, so no one wants to do those hours.
- Thank you for making the PIHPs responsible for utilization and management in all waivers and the (i) SPA
- Thank you for including the conflict-of-interest rules in all waivers and the (i) SPA.
- Please include **housing assistance** in all the waivers. Housing remains one of the biggest barriers to living in the community.
- Thank you for requiring PIHPs and CMHs to follow the Department's Conflict-Free Access and Planning policies in all waivers and the (i) SPA.

1915(i) SPA

Comments not included under the HAB Waiver.

- **Housing Services**

- The requirement that direct support staff, peer support specialists, and peer recovery coaches must have two years of experience in providing services to tenants in a supportive housing or other social services setting or lived experience of homelessness and/or supportive housing seems excessive. This is particularly true in the current staffing climate.

- **Skill Building Assistance**

- Thank you for clarifying the services available.
- Thank you for making sure people do not have to receive skill building services prior to receiving supported/integrated employment services under this section.
- Thank you for clarifying students may receive supported/integrated employment services in addition to school employment services.

- **Self-Directed Services**

Thank you for making sure the contract between the MDHHS and the PIHPs contains the Self-Directed Services Technical Requirements Self-Determination Policy and Practice Guideline in all waivers and the (i) SPA.

- **We need enforcement of these requirements.** Currently, they are not followed by many CMHs.

CWP Waiver

- **Specialty Services**

- Thank you for adding Equine Therapy to the CWP and SEDW.
- Please make Equine Therapy available for adults in the 1915(i) SPA and the HAB Waiver. They would receive equal benefit.

➤ Thank you for allowing flexibility regarding provider board certification.

- **100 CWP “Slots” Added**

➤ Thank you for the additional “slots,” however many more are needed.

SEDW

There are no comments that are not included elsewhere.

We ran out of time and ended before Laura’s report. Sorry!

3. MDHHS – Laura



4. Other



Future Meeting Dates

- 07/10/24 - Brokers
- 08/14/24
- 09/11/24 for all PAS teams
- 10/09/24
- 11/13/24
- 12/11/24

