



West Virginia Developmental Disabilities Council

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WV Developmental Disabilities Council's Comments on Proposed Amendment to I/DD Home and Community-Based Services Waiver Application

The WV Developmental Disabilities Council (WVDDC) appreciates the opportunity to provide comments on amendments being proposed by the Bureau for Medical Services (BMS) to the I/DD Home and Community-Based Services Waiver (IDDW) application.

The Council is pleased to see the changes that were being proposed in the IDDW application out for comment in the spring were not included in this amendment. It is our understanding the BMS decided to renew the waiver application under which the State was already operating for another five-year period and make these amendments instead.

The State plans to rename the service currently called “service coordination” to “case management” and implement conflict-free case management, as required by the Federal government effective January 1, 2021. It appears case load limits have also been removed. Since the role of case manager will be the same as the role of service coordinator under the current system, the Council is concerned about what this will mean for those served by the program. What assurances will be in place to assure caseloads are reasonable and manageable?

It is a positive step to see the BMS will be developing a certification process/case-management training which will be required of individuals seeking to provide case-management services who have a four-year degree in a human service field but are not licensed social workers.

The Council has advocated for a change to a monthly fee rather than the billing of 15-minute units for case management services for more than a decade. We appreciate this change but are interested to know what safeguards will be in place to assure the appropriateness of the billing.

The Council has no opinion on the implementation of Electronic Visit Verification (EVV). It is a federal mandate.

We are happy to see the addition of several services (Physical, Occupation, Speech, and Dietary therapies, along with Environmental Accessibility Adaptation for Home and Vehicle) to the self-directed option. This moves West Virginia in the direction of having a true self-directed program, although there are still several challenges to it.

As mentioned earlier it is a relief to see the BMS did not include several of the ideas proposed in the earlier application which the Council strongly opposed. Those included things such as the prohibition on billing respite services while the caregiver works and moving therapy services from the Waiver to ESPDT or State Plan services.

We are sorry to see other proposals made then that did not make it into this amendment, such as the restriction placed on the use of cameras in bedrooms and bathrooms.

The Council also feels more can and should be done to encourage the competitive employment of people served by the program, including training requirements and higher compensation for individuals employed to assist in obtaining and supporting people in competitive employment settings.

Finally, the rates listed for the five-year period are hard to understand. Some rates appear to have increased by a few cents from the previous application while others decreased. Some rates, for instance Job Development, begin and end at less than the published current rate. Is the BMS proposing a decrease in rates for some services?

The Council continues to advocate for higher rates for those workers who are providing direct support services to increase the likelihood of attracting and retaining qualified individuals to the workforce and to demonstrate the work they do is valued.

We thank you for this opportunity to provide comments on the proposed amendment, and we remain available to discuss any of these comments further.