

## **Partnership for Hope and Missouri Children with Developmental Disabilities Waiver Renewal Public Comment Summary**

This document contains a summary of the public comments collected in response to the Partnership for Hope (PFH) and Missouri Children with Developmental Disabilities (MOCDD) Waiver Renewal Applications. Public comment was taken from February 9, 2018 through March 11, 2018. A notice regarding the PFH and MOCDD Waiver Renewal Applications was posted in the Columbia Tribune, Independence Examiner, Kansas City Star, and The St. Louis Post Dispatch on February 9, 2018. The PFH and MOCDD Waiver Renewal Applications were available to the public on February 9, 2018. A public forum was held in Jefferson City on February 20, 2018. In accordance with Centers for Medicare and Medicaid Services (CMS) guidance, the PFH and MOCDD Waiver Renewal Applications were made available for public comment for 30 days after February 9, 2018 to allow all self-advocates, providers and stakeholders an opportunity to provide input to the applications. Paper copies of the State's PFH and MOCDD Waiver Renewal Applications were distributed to Missouri Regional Offices and at the public forums. During the public comment period, MO HealthNet Division (MHD) and Department of Mental Health (DMH) received comments from:

A Pediatric Home Health Provider

Missouri Association of County Developmental Disabilities Services (MACDDS), which is comprised of 65 county boards and 19 Related Private Organizations that provide local services for people with developmental disabilities.

The following addresses the questions, comments, and letters received during the public forum and public comment period.

**Appendix B Participant Access and Eligibility** - Comments and questions in this section center on the requirements of Appendix B of the waiver application regarding target group(s) of Medicaid beneficiaries that the waiver serves, its scope (i.e., how many persons the waiver serves), and processes associated with entry into the waiver. No changes were made to the waiver application as a result of any comments in this section. There was one comment received for Appendix B.

**Individual comment:** Can there be a parental income cap or income asset based decision on the MOCDD waiver so when families' stature improves then they can leave the waiver? This would allow the waiver be given to other families with more needs? There are so many children that need the MOCDD waiver and most children remain in the waiver until they age out at 18.

**Response:** No, because considering parental income and resources is waived for children who participate in the MOCDD waiver. The financial eligibility is determined solely on the income and resources of the child. It is required for individuals that participate in the waiver to be assessed and re-determined annually to still be eligible for the waiver and have identified needs that can only be met through the waiver.

**Appendix C Participant Services** – Comments in this section center on the requirements of Appendix C of the waiver application regarding the services that are provided in the waiver. No changes were made to the waiver application as a result of any comments in this section.

**Comment:** The proposed change that impacts beneficiaries and providers is the new limitation on Community Integration. Community Integration is a home and community based service designed to assist or teach participation in community activities such as “becoming a member of social events/clubs, recreational activities, volunteering, participating in organized worship or spiritual activities.” The purpose of the benefit is to encourage persons with disabilities to engage and interact in the community with persons who are not paid to provide services to them. In the prior renewal of the DD Comprehensive Waiver, this benefit was limited to 25 hours/week, but in a provider bulletin dated March 23rd, 2017, the Division added another limitation of no more than five hours per day. The overall limit of 25 hours/week was not changed, but a daily limitation was added. (See MoHealthNet Division Provider Bulletin – Volume 39 Number 43, dated March 23rd, 2017.) As providers, we understand the need and authority of the Division to impose reasonable limitations, but to add another layer of restriction to this service, which has no impact on the cost to the program since the weekly limit has not changed, only serves to impact the ability of the individual to fully engage in his/her community. Further, this limitation imposes an unequal burden on beneficiaries and providers in rural areas where engagement in community activities frequently involves considerable travel time.

**Response:** There is no change in the 25 hour per week limit for Community Integration service in the PFH and MOCDD renewals. This limit is in all of the Division’s CMS approved Waiver applications. MO HealthNet’s billing system currently allows for daily limits, not weekly limits. The Division will work with providers and individuals who need to exceed 5 hours of Community Integration service in one day to ensure appropriate services and billings can occur.

**Comments:** General comments about Medicaid state plan services including private duty nursing and personal care were received.

**Response:** No response needed as this was not related to the waiver application renewal.