# Rhode Island Disability Law Center, Inc.

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By e-mail: *RhodeIsland1115Waiver@ohhs.ri.gov*
August 9, 2013

Rhode Island Medicaid 1115 Waiver Extension Request
74 West Road
Building 74
Cranston, RI 02920

Re: Comments on the Addendum to the Medicaid 1115 Waiver Extension Request

Dear Sir/Madam:

On behalf of the Rhode Island Disability Law Center, Inc. (RIDLC) I am submitting the following comments regarding the Addendum to Rhode Island's request for an extension of its 1115 Waiver. RIDLC is the federally funded non-profit law office designated as Rhode Island's protection and advocacy agency for individuals with disabilities in Rhode Island. We commented previously on the extension request and appreciate having the opportunity to comment again on Rhode Island's submitted application and this addendum.

Our comments are directed to the expansion of eligibility and services, as well as to evaluation.

Expansion of Eligibility and Benefits

We appreciate the state's efforts to expand eligibility to currently uncovered groups of individuals with disabilities, including those described within Budget Population 20 -- younger adults with Alzheimer's disease or related dementias, Budget Population 21 – children aging out of Katie Beckett, and those described within the clarification to Budget Population 17 – children under 18 with serious emotional disturbance (SED), other behavioral challenges or significant medical needs who live at home. The families of children in this latter population need support to enable their children to be fully integrated and to optimize their functioning. (The services described in Waiver Request Item #6 should also help ensure the well-being of these families and children.) Young adults aging out of Katie Beckett often need services beyond of the scope of traditional commercial insurance (e.g., assistive technology, personal care) in order to have successful adult lives.

We also appreciate the state's recognition that social determinants (such as housing and employment) can have a significant role in health outcomes, and the state's proposal to use funding

to support better social outcomes. Waiver Request Item #8 – Housing Stabilization Services, and Waiver Request Item #9 – the Healthy Works Initiative, are services that could significantly promote community inclusion and integration for individuals with disabilities. We look forward to the funding of these initiatives. Healthy Works could also further the state's Employment First goals for individuals with disabilities, so that more adults with disabilities who choose to work will be better able to access integrated and competitive employment.

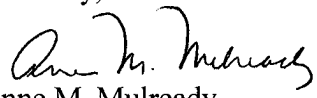
As advocates for individuals with traumatic brain injury (TBI), we support removing the hospital level of care requirement for habilitation services, as described within Waiver Request Item #7. Utilizing a highest or high level of care should enable more individuals, including those with TBI, to be supported in and integrated into their communities.

Evaluation

We appreciate the resources EOHHS expends to engage stakeholders in understanding the goals and outcomes of its health care initiatives. As a Global Waiver Task Force member, we valued learning about the Adult Quality Measures Grant and its potential to increase the state's capacity to track outcome measures, especially with respect to long-term care services. We look forward to learning more about meaningful measures to assess long-term care quality. As an advocacy organization, we hear anecdotally about problems with individual eligibility, timely access to services and provider capacity issues in long-term care programs. Especially as we move into models of integrated care, we hope that future evaluation efforts will include measures that look at these issues, as well as beneficiary self ratings of community involvement, community integration and other social issues that are in line with the goals of long term care.

Thank you for this additional opportunity to comment on the waiver request.

Sincerely,



Anne M. Mulready
Supervising Attorney