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*Jenney Samuelson, Secretary
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Date: October 10, 2023

Re: Response to Public Comments for Global Commitment Register notice GCR 23-115: Designated and Specialized Service Agencies (DA/SSA) Workforce Investment

The Agency of Human Services (AHS) response to public comments on this policy change, as well as a summary of the comments received, is below. AHS received six public comments on this proposed policy for the DA/SSA workforce investment. Comments were submitted by six individuals/organizations.

Comment:

The State of Vermont received five comments from parents, family members, and other stakeholders on the importance of including direct support professionals as qualified providers for the reimbursement benefits. Concerns raised included not properly supporting this essential sector of the workforce and leaving Vermonters without critical access to care.

State Response:

AHS appreciates these comments and the concern of stakeholders regarding the inclusion of direct support professionals as a part of the tuition reimbursement benefit outlined in this investment. AHS recognizes the important role that direct support professionals have in providing essential care across Vermont and has included direct support professionals in the updated version of the DA/ SSA Workforce Investment.

Comment:

I am submitting input on the proposed changes for conflict free case management as a parent and guardian of an adult with developmental disabilities and complex clinical profile. I have discussed this proposed change with my adult son, and I'm including his thoughts, too. Thank you for the opportunity to provide our input as stakeholders.

I am responding using a benefits and concerns format regarding proposed changes for conflict free case management. Unfortunately, there are many assumptions needing to be made because of missing details.

Benefits:

1. Vermont's proposal seeks to return to compliance with CMS.
2. The plan is person- centered.

Concerns:

1. The proposal is far too general and conceptual and more specification is needed to truly understand the details of how this will work.
 - 1A. How to have a more detailed job description with roles and responsibility defined for case manager.
 - 1B. How to know what the client: case manager ratio is proposed to be.
 - 1C. How to have a more detailed job description of the service coordination at the DA/SSA level and the relationship to the client's case manager. What are the qualifications needed for this position?
2. Only one proposal is being offered up for Developmental Services by the State and we would have preferred to have had the opportunity for having choice amongst other options under consideration.
3. How to have more than 2 entities that offer case management across the state.
 - 3A. How to know whether these proposed 2 entities will have the local knowledge of resources that are available in the client's area of residence. How not to lose the local connection DA's and SSA's have for what is available for adults with developmental disabilities in their local area.
 - 3B. Although 2 options for case management entities are being offered by the State and there is "choice", the proposal doesn't provide the number of options for choice that we desire (I.e. would like more than two options).
4. How to maintain the local support and specific knowledge of the client provided by DA's/SSA's today when under the new proposal.
 - 4A. How to know what a transition plan will encompass to provide client stability when case management changes. How to consider that many of those with developmental disabilities struggle with change/transitions.
 - 4B. How to ensure future definition of case management still provides in person connection on a monthly basis. We learned during Covid how critical this is to maintain our son's mental health stability. What is the plan for this to be addressed by having only 2 entities across the state handling case management?
 - 4C. How to understand where behavior management responsibility and intervention will fall. Will it be with the local DA/SSA or with the case manager? Will on call services be available at the case manager level, if needed?
 - 4D. For adults with developmental disabilities and comorbid diagnoses, how will consistency of case management be encouraged and maintained.

5. Other

5A. How to know how many others states are using a similar model to what is being proposed?

5B. How to know whether current DA/SSA case managers will be lost to the 2 new entities contracted with by the state given the current staffing crisis.

5C. How to know whether this proposal will negatively impact direct support workers supporting DS because a career path option has been removed at the local level, especially given the crisis staffing situation that exists today.

5D. How to know whether this proposal will create a check and balance to the quality and amount of services being delivered in the future. I am hopeful but not yet convinced it is a definite. The staffing crisis of direct support workers needs to be addressed with viable solutions that will encourage/incentivize the hiring and retention of direct service professionals.

Thank you for consideration of our input into the stakeholder response. Please be in touch if you have any questions on our comments.

State Response:

AHS appreciates the time, effort, and concerns raised by this commentor. However, this comment relates to Conflict-Free Case Management, which is outside of the scope for GCR23-115. Opportunities to comment on Conflict-Free Case Management can be found here: <https://vermonthcbs.org/>.