




COMMONWEALTH OF VIRGINIA
Virginia Board for People with Disabilities

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TO: Teri Morgan
Developmental Disabilities Program Manager
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FROM: Heidi L. Lawyer 

RE: Family and Individual Support Waiver and Building Independence Waiver
Renewal Applications

DATE: March 16, 2018

The Virginia Board for People with Disabilities (the Board) appreciates this opportunity to comment on the draft applications for renewal of the Family and Individual Support Waiver and the Building Independence Waiver. The Board is supportive of the inclusion of Benefits Planning as a waiver service. Fear of losing critical benefits is a commonly cited barrier to employment for people with disabilities, and access to accurate and timely information about the impact of employment on benefits and the tools available to help individuals obtain employment without losing critical benefits is an effective means of mitigating this barrier.

The Board offers the following recommendations to improve the draft applications for renewal:

1. *The Board recommends adding consumer-directed options to the Building Independence waiver.*

The BI Waiver is specifically designed to provide assistance to individuals who are capable of living in the community with limited supports. The stated objectives of the Building Independence (BI) Waiver include the following:

1) Promote independence for individuals through high quality services and the assurance of health, safety, and welfare through a comprehensive quality management strategy; 2) Offer an alternative to institutionalization and costly comprehensive services through an array of community supports that promotes inclusion and independence by enhancing, rather than replacing, existing natural supports; 3) Support individuals and their families in sharing responsibility for their supports and services.

Considering the capacity for independence of those who receive services under this waiver and the Department's goal of enhancing their independence and responsibility, it is odd that this is the only waiver that does not include consumer-directed services. Allowing these individuals to direct some of their own supports and services would help achieve the Commonwealth's goal of enhancing their independence and allowing them to share in the responsibility for their own supports and services. The Board therefore encourages the Commonwealth to include consumer-directed services in the BI Waiver.

2. The Board recommends including data collection and analysis related to rates of usage of new waiver services within its Quality Improvement Strategies for each Waiver.

The Board strongly supports the recent addition of employment and community transportation, as well as the addition of benefits planning to the array of services available to DD Waiver recipients. These services, if utilized, can have a meaningful impact on the ability of waiver recipients to increase their independence and gain greater access to their communities. There have been some concerns raised by members of the provider community however about the workability of these new services from a provider perspective. Questions have been raised about the sufficiency of the associated rate structures and provider liability, among other issues. In order to ensure that these services have their desired impact, the Board recommends including in the Commonwealth's Quality Improvement Strategies a plan to collect and analyze meaningful data about the utilization of these services so that any issues with their implementation can be discovered and remedied quickly.

The Board appreciates this opportunity to comment on the Family and Individual Support Waiver and Building Independence Waiver Renewal Applications. We look forward to continuing to work with DBHDS, DMAS, and other stakeholders to improve the quality of services and supports available to individuals with developmental disabilities and their families in the Commonwealth of Virginia. Feel free to contact me should you have any questions or need additional information.