



Achieve with us.

*For people with intellectual
and developmental disabilities*

The Arc of Florida welcomes the opportunity to offer comments and share concerns on the iBudget Redesign Final Plan. The Arc of Florida began in 1953 as a grassroots support organization designed to allow individuals with intellectual and developmental disabilities to live their lives as valued members of their community despite prevailing societal expectations for institutional placement. Today the Arc is the most enduring advocacy organization for persons with intellectual and developmental disabilities and has blossomed into a statewide network composed of 38 Chapters that collectively serve and support more than 10,000 people engaged and living successfully in their communities.

We recognize the overarching theme of the report and that the original intent of the Medicaid program was to provide critical health coverage to extremely low-income families, elderly, and individuals with disabilities. Individuals with intellectual and developmental disabilities are often in need of, and dependent on, lifelong services provided by the state from the time of their birth until their death. This is often referred to as the true long-term care system. As support for the needs of the most vulnerable members of society is the original, core mission of the program, we urge policymakers to dedicate the resources necessary to achieve the original intent of the program and to closely examine any proposed changes to the program.

We appreciate inclusion of the public's suggestions that we see as helpful, but also note that some parts of the plan could adversely impact people who receive services under the iBudget Waiver. The iBudget program serves over 34,500 people, but there are still more than 21,000 people on the waiting list. Current iBudget clients are eligible for institutional care and if everyone invoked their entitlement to this care, the cost to the state would increase by \$3.4 billion annually.

The 2019 Implementing Bill requires the redesign of the iBudget waiver program to:

- Improve budget predictability;
- Maintain or improve the services needed for health and safety;
- Ensure flexibility of clients to select services that meet their needs; and
- Improve the support coordination services that promote management of service utilization.

We provide the following comments on the finalized proposal for the iBudget Redesign Plan submitted to the Legislature on September 30, 2019. We have organized our responses under the applicable provision of the implementing bill to align with the requirements detailed above.

THE BEST PATH TO IMPROVE BUDGET PREDICTABILITY REQUIRES:

ARC SUPPORTS:

- Arc supports the recommendation contained in the redesign report to direct the principals of the Social Services Estimating Conference to forecast expenditures for the iBudget waiver consistent with Federal law as interpreted by the courts and consistent with current administration by the Agency for Health Care Administration and Agency for Persons with Disabilities. This will require the principals to develop forecasting models based on relevant data and give policy makers and stakeholders a realistic estimate of the cost of the program based on current law and current administration.
- Arc supports, in principle, the recommendation in the redesign report to adopt an improved client assessment instrument. However, since the new assessment instrument is not yet developed and we are not privy to how the results will be used, the Arc defers further comment on the specific instrument to be developed and how it will be used in conjunction with or as a replacement for the algorithm pending the availability of more complete information.

ARC SUGGESTS:

- Arc respectfully points out that Florida, by far, has the highest percentage of aging caregivers in the nation. Compounding this issue, one out of every five people in Florida is 65 or older. Data from the US Census Bureau and other sources suggest that this will significantly drive future need for services as the capacity for caregivers to provide natural supports decreases while the needs of their aging loved ones increase. Not preparing for the reality of an aging population will lead to a systemic failure of any effort to assess or predict the future needs and costs of this vulnerable population.

TO MAINTAIN OR IMPROVE SERVICES NEEDED FOR HEALTH AND SAFETY REQUIRES:

ARC SUPPORTS:

- Arc supports the finding in the redesign report that the iBudget remains the most cost-effective way to deliver services and that managed care is not an effective approach for individuals that need ongoing and lifelong services. Given the overwhelming needs that remain unmet in the system, the State of Florida can ill afford to direct new or existing resources to administrative overhead and maximizing the profits for a managed care organization when those resources could instead go to direct services. Further, Federal law requires the iBudget to deliver medically necessary services. The same demographics which translate into increased service requirements will lead to future cost increases regardless of how the system is organized and managed. The iBudget Waiver is truly the best option, being both cost-effective and service effective for people.
- Arc supports continued funding for Significant Additional Needs which are determined to be necessary as personal circumstances change.
- Arc supports an ongoing commitment to bring people to be served off the wait list, including the 1,000 currently proposed and to respond to our growing population.

ARC OPPOSES:

- Arc is opposed to transitioning to a managed care system. There is no evidence that managed care would save money and there has been widespread dissatisfaction among clients and family members in many states that have adopted managed care to serve the long-term care needs of this vulnerable population.
- Arc is strongly opposed to any changes to Significant Additional Needs, including its definition, which result in service reductions, limitations, delays or denials.

ARC SUGGESTS:

- Arc strongly suggests that, in addition to the recommendations contained in the redesign report, that there be a serious effort to simplify the overly complex iBudget Handbook to emphasize quality of service over ineffective compliance measures. The APD service delivery system operates on razor thin margins and any diversion of resources from client care to bureaucratic compliance activities that add no value in terms of quality of care or health and safety should be eliminated.
- Arc strongly suggests that the most important consideration in maintaining services needed for health and safety is to provide rates that will allow for competitive wages to those delivering direct care. There is a well-documented crisis in recruiting, hiring and retaining the qualified, hands-on, direct care staff who are the most critical link in ensuring client health, safety and well-being.
- Arc strongly suggests that increases to the federal and/or state's minimum wage be reflected in a proportional service rate increase that will be applied to the wages of direct service professionals.

TO ENSURE FLEXIBILITY OF CLIENTS TO SELECT SERVICES THAT MEET THEIR NEEDS REQUIRES:

ARC SUPPORTS:

- Arc supports maintaining the iBudget which is designed to maximize client choice in meeting their needs. The flexibility to maximize the impact of state funded services based on personal circumstances and needs represents the most cost-effective and desirable means of supporting individuals in their communities where they have access to family, friends, community amenities, and other natural supports.
- Arc supports shifting funding from AHCA to APD as funding for certain services is required to be shifted from the Medicaid State Plan to the iBudget waiver.

ARC OPPOSES:

- Arc is opposed to limiting Life Skills Development services which are often the lifeline allowing caregivers to remain employed and keep their loved one in the community. This includes all reductions, limitations, delays or denials that create barriers to access at any time during the year.
- Arc is opposed to capping cost plans at \$205,000 for those with the most intensive needs. The capping of rates serves to disproportionately limit the availability and/or quality of services. It then shifts the unfunded costs onto those remaining providers attempting to offer support the most vulnerable.

***TO IMPROVE SUPPORT COORDINATION SERVICES THAT PROMOTE MANAGEMENT OF SERVICE UTILIZATION
REQUIRES:***

ARC SUPPORTS:

- Arc supports improved training, oversight and accountability for Waiver Support Coordinators. Support coordinators are a critical link in successful community living and a failure to maximize natural supports or provide appropriate representation of their client can have a devastating impact which often results in personal hardship and higher costs.

ARC OPPOSES:

- Arc is opposed to any provision for Waiver Support Coordinators that significantly disrupts established relationships, reduce overall staffing or other changes which result in service reductions, limitations, delays or denials.

The Arc appreciates the time and effort of those who contributed to the iBudget Redesign. The Arc of Florida and Chapters located throughout the state stand ready to provide support in working with APD staff and other stakeholders to effectively implement the proposed solutions and would welcome the opportunity to share our expertise in this endeavor is advanced.