

Date: December 29, 2015
To: Commissioner Murray, DDS
From: Paul M. Rosin
Position: Executive Director
Organization: Community Residences Inc.

Re: STS Recommendations

Over the past four years, Community Residences Inc. has opened three Community Living Arrangements for people that are leaving Southbury Training School. CRI is scheduled to open two additional STS homes in 2016. In addition to this, CRI has in the past moved people out of STS into Community Companion Homes (CCH) and currently serves many people from STS in community based Day Options. Given this CRI has an informed perspective as to what works and what does not work in terms of moving people from STS into the community.

Recommendation 1: In order to decrease the cost of the operation of STS and increase the pace of movement into the community, privatize the programmatic operation of STS cottages on an incremental basis utilizing freed up public staff to cover vacancies in cottages not privatized.

Justification: The cost of the operation of STS continues to consume a significant portion of the DDS budget. This is in part caused by staff vacancies and consumer special needs that are covered by overtime. In the event that DDS contracted with not-for-profits to operate a cottage(s) it would free up public staff to work in other cottages cutting down significantly on overtime costs. In addition to this, families/ guardians/ consumers would develop relationships with not for profit providers. This would facilitate the move of these people into opportune vacancies in the not-for-profits existing programs and/or developed CLAs that could support them in the community.

Recommendation 2: In order to increase the rate of the development of group homes to support people coming out of STS, incentivize the development and placement of consumers by allowing not-for-profits to pay a higher rate of pay to staff that are employed in these programs.

Justification: All not-for-profits are struggling to find and keep the type of high quality staff necessary to provide for the needs of the people that are coming out of STS. As a result, many not-for-profits defer making the commitment to open STS homes out of fear that they will not be able to hire the staff necessary to open the programs in a timely fashion. By agreeing to pay a higher rate of pay, more agencies will agree to open programs for STS residents, increasing the number of beds available, facilitating the closure of the facility.

Recommendation 3: Increase from 30 days to 60 days the amount of start-up funding provided when opening a STS CLA and open the window for when an Agency can spend this money from 45 to 90 days.

Justification: It is costly and time intensive to open a house for people coming out of Southbury Training School due to the needs of the individuals being placed and the amount of coordination that is required with staff from STS/Guardians/ Advocates/ Consumers. Start-up funding is utilized to pay for staff recruitment, training, furniture, utilities, house supplies, etc. For the last five homes that CRI opened, the agency was disallowed \$180,787 or average of \$36,157/house. This was due to the amount of money allowed for start-up but it was also due to the fact that you can only utilize these funds within a 45-day window prior to moving the first resident into the home. Increasing the amount and the window is, given the complexity of opening these homes, fair and appropriate.

Recommendation 4: For DDS to work with DSS to set interim Room and Board Rates for the development of new STS homes that are more realistic and accurate.

Justification: When a not-for-profit opens a licensed Community Living Arrangement (CLA) the Agency submits to DSS an *Application for Room and Board Rate*. From this application DSS generates an interim rate for the room and board costs of the house. Frequently, DSS will generate a rate that is significantly below what is requested on the Application. While it is true that this is an interim rate that is trued up when a permanent rate is established 18-24 months subsequent to the date that the home opens, there is a significant hit to the agencies cash flow over this period of time. This is a disincentive for agencies to open homes and slows the process of closing STS.

Recommendation 5: Review and determine the cost/benefit of requiring I-2 fire suppression systems in Licensed group homes as opposed to R-13 fire suppression systems.

Justification: In recent years, Agencies that are developing homes with four (4) or more residents have been required to install institutional level (I-2) fire suppression systems. These systems frequently cost in excess of \$125,000 to install, are institutional in nature and are a significant on-going cost to maintain. R-13 fire suppression systems are in literally hundreds of group homes around the State, cost approximately \$25,000 to install and have not been proven to be ineffectual. It is recommended that the State make a final determination whether or not I-2 level systems are required for small community residential homes.