



To: Morna A. Murray, J.D., Commissioner, Department of Developmental Services

From: Gian-Carl Casa, President & CEO, The Alliance

Re: DDS Five Year Plan 2017 – 2022

Date: December 22, 2016

The Alliance is a membership association representing more than 500 nonprofit agencies and is the largest advocacy organization representing nonprofits in Connecticut. The following testimony is presented on behalf of The Alliance members who contract with the Department of Developmental Services (DDS) to provide services and supports to individuals with intellectual and/or developmental disabilities.

Each year, community nonprofits serve more than half a million people in Connecticut, thousands of whom are people with intellectual and/or developmental disabilities. Programs and services provided by nonprofits are a vital part of our cities and towns, allowing individuals and families to live productive lives in the community, and contributing to making Connecticut an exceptional place to live and raise a family.

Community providers currently serve over 90% of individuals in the DDS system with residential, in home, day and employment supports, offering services of the highest quality. Tens of thousands of dedicated, exceptional workers provide care for these fellow citizens every day.

The Alliance thanks the Department for providing the opportunity for the public to submit comments on the DDS Five Year Plan 2017 – 2022. We appreciate the progress the Department has made in the last five years, as highlighted in the document.

This document can be a starting point for creating a more specific and targeted plan to use community nonprofit providers as a way to serve more people. Currently, thousands of families are waiting for services, and there is an opportunity to reduce the number of them who are entitled to, but are not yet receiving, services. With adequate financial support from the State, nonprofits can provide high-quality, cost-effective services to more people and families, while saving significant state dollars.

The five-year plan should include an action plan to do that.

The Alliance supports the overarching recommendations and concepts as presented in the Five Year Plan, and commends the Department for the Plan and the progress it describes. The following recommendations are presented on behalf of the Intellectual/Developmental Disabilities Division of The Alliance. We look forward to the opportunity to continue to serve as a resource and partner with the Department to achieve the goals of the Five Year Plan moving forward.

CT Community Nonprofit Alliance

Hartford Office: 75 Charter Oak Ave, Bldg One, Suite 1-100, Hartford, CT 06106 | 860.525.5080

Rocky Hill Office: 35 Cold Spring Road, Suite 522, Rocky Hill, CT 06067 | 860.257.7909

Recommendations for Consideration

1 Acknowledgment of the Value of the Partnership Between DDS and the Nonprofit Provider Community, and the Quality of Services Provided:

While the Plan includes descriptions and narratives related to many areas of services, it is critically important to acknowledge the value of the nonprofit provider community, and the significant role that they play in the delivery and quality of services and achievement of goals of the Department. Community providers serve the majority of individuals in the DDS system with residential, day and employment services, offering services of the highest quality. Tens of thousands of dedicated, exceptional workers support these individuals every day.

The Alliance recently released the 2017 Legislative Briefing Booklet, [*The Nonprofit and State Partnership: Building Healthy Communities and a Thriving Connecticut.*](#) It explains in a simple and straightforward way the issues and concerns of community nonprofits going into the 2017 legislative session. Included in the Briefing Booklet is a brief entitled: '**Nonprofits Provide Exceptional Services.**' The Brief, which begins on page 4, specifically speaks to the quality of services provided by DDS funded, private agencies.

The Brief includes supporting data from the 2012 Legislative Program Review and Investigations (PRI) study, as well as many testimonials from family members of individuals successfully served by nonprofit providers of I/DD services. There are eleven testimonials included in the Appendix, which begins on page 20. These incredibly powerful testimonials speak to the quality of services received in the nonprofit sector and the impact that the services and staff of the nonprofit provider network have had upon the individuals served. (Additional testimonials are available upon request.)

2 Streamlining DDS – Recommendations of The Alliance Regarding Unfunded Mandates & Duplicative Processes:

In October 2015, (the former) CT Nonprofits submitted to DDS a [summary of concerns and recommendations](#) related to unfunded mandates, as well as recommendations related to streamlining the process of service delivery and reporting, etc. In addition the committee included a “crosswalk” connecting (wherever possible) the unfunded mandates to areas within the DDS contracts where these mandates may be found. Recommendations refer to the following topics/areas of concern:

SECTION I: DDS UNFUNDED MANDATES FOR FURTHER CONSIDERATION:

1. Health & Safety
2. Agency Staff: Program Coverage, Training, etc.
3. Administrative & Overarching

SECTION II: RECOMMENDED AREAS FOR STREAMLINING DDS PROCESS

1. Quality Service Review (QSR)
2. Health & Safety
3. Finance & Human Resource

Subsequently, in 2015 and 2016, Commissioner Murray and the DDS Executive Team committed to considering the recommendations in the summary, in DDS' efforts moving forward. To this end, The Alliance respectfully requests that DDS work with representatives of The Alliance to explore ways in which we may be

Recommendations for Consideration – Continued	
	<p>#2 Continued:</p> <p>able to implement the recommendations to best serve all stakeholders. You may access the recommendations as follows: Recommendations to DDS (Includes a cross-walk/corresponding location in DDS Contracts.)</p>
3	<p><u>Acknowledgment of the Role of Conversions in the Accomplishments of the Past Five Years:</u></p> <p>While the Plan outlines many key accomplishments of the Department since 2012, the ongoing, successful conversion of services from the public to the nonprofit sector is certainly an area of significant success. It is critical to continue to showcase the successes within the conversion process, as a way to enhance the process and ensure that all stakeholders involved in future conversions are able to make informed decisions. In addition, plans for future conversions should include increased efforts by the Department to inform and educate the individuals and families involved before the conversions are announced.</p>
4	<p><u>Overarching Need for Additional Clarification – Action Steps & Timelines:</u></p> <p>While the Plan includes many areas of critical importance, there is a need for clarification in terms of steps necessary to achieve goals as outlined, as well as anticipated timelines.</p>
5	<p><u>Prioritization Process:</u></p> <p>With so many critical and competing issues at hand, it is extremely important that the Department has a clear process to prioritize goals and objectives. The Alliance would welcome the opportunity to work with you on that.</p>
6	<p><u>Increase Communication with Your Partners in the Nonprofit Sector:</u></p> <p>The strength of the partnership between DDS and the Nonprofit Provider Community is greatly dependent upon ongoing, consistent communication. The Alliance respectfully recommends an increase in consistent, timely communication from the Department. Monthly updates in all areas, in addition to more immediate, time-sensitive updates, would be extremely valuable. Increased communication would help ensure that members of the nonprofit community (a) are as well prepared as possible to support the people they serve, (b) can better plan for impending changes in a thoughtful manner, and (c) are better able to keep their staff as well-informed as possible. It will help achieve the Department’s collective goals.</p>
7	<p><u>Increased Opportunity for Provider Input:</u></p> <p>In addition to communication, the strength of the partnership between DDS and the nonprofit provider community is greatly enhanced by ongoing opportunities to provide meaningful input. The Alliance recommends establishing a revised process for input, to include an increased number of opportunities and participation by representatives from the nonprofit sector. There is a plethora of talent and ideas that would be valuable to moving the five-year plan forward in an effective and expedient manner.</p>

Recommendations for Consideration – Continued	
8	<p><u>The HCBS Settings Rule - Innovation and Transformation (#3):</u></p> <p>While Connecticut has received its initial approval, there is a tremendous amount of work and follow-up required. The Alliance requests an increased effort by the Department around focus, guidance and tools to ensure full compliance with this federal mandate. March 2019 is fast approaching.</p>
9	<p><u>Increased Support and Options for Individuals with Greater Levels of Need Related to Employment:</u></p> <p>The Alliance supports the Department’s engagement in the national movement toward competitive employment for people supported by DDS. However, additional efforts must continue to address the needs of individuals who, for a variety of reasons, either have (a) yet to find meaningful employment placements that fit their capabilities, or (b) expressed a desire to pull back from employment in favor of social and/or recreational opportunities. We must continue to work together to achieve creative solutions to the challenges that remain.</p>
10	<p><u>New Options re: the LON - Universal Tool:</u></p> <p>There is a need for clarification regarding the proposed Universal Tool, and how this evaluation process will compare to the previous Level of Need (LON) tool. Providers have questions regarding whether this tool will be used for fee-for-service, how this change affects or relates to rate development, etc. It appears that this will be determined by DSS, with some type of application. There are concerns regarding DSS applications for services - especially concerns of parents and guardians unfamiliar with the process. They often need assistance to understand the requirements and successfully complete the process.</p>

Thank you again for the opportunity to provide these recommendations.

Please do not hesitate to contact me with any questions or for additional information:
 Julia Wilcox, Senior Public Policy Specialist JWilcox@ctnonprofitalliance.org 860.525.5080 ext. 1025