



July 19, 2021

Dear Director Davis,

The Ohio Provider Resource Association would like to thank you and the staff at DODD for the partnership, diligence and thoughtfulness put into the many proposals emerging from the Blueprint workgroup. It has been our privilege to serve on the committee, and we look forward to many of the system changes proposed for Ohio's array of day, vocational and employment supports for people with developmental disabilities. We are broadly supportive of the work and goals of the committee and, now more than ever, feel Ohio needs to invest and create meaningful policy changes to support day and vocational providers and the thousands of Ohioans with disabilities they collectively serve.

We do, however, remain concerned about the timelines for implementation proposed by DODD, especially as Ohio's DD providers find themselves in an especially precarious situation, trying to build capacity and safely serve people in this 'new normal'. As we have shared in previous feedback, as well as during several committee meetings, we remain concerned about and opposed to Basic Employment Skills Training (BEST) as the first of the service proposals to be implemented. There are many proposals developed through the blueprint committee that expand access to meaningful community and employment supports, and those should be considered prior to, or at least in conjunction with, the BEST service.

We at OPRA remain deeply committed to community and competitive integrated employment supports for Ohioans with disabilities and work closely with members through our Employment services and Day Array committees to advance initiatives and share best practices that help people with disabilities achieve community employment. Additionally, as OPRA staff and members participated in the years-long 'Payment in Adult Day' workgroup, as well as the blueprint committee, we understand the level of time and commitment that went into developing the BEST proposal. This time commitment alone cannot be justification for advancing a policy that is ill-timed and still in need of further refinement and development.

Given the events of the last year and the especially challenging situation that day and vocational providers currently find themselves in, we believe that BEST should be one of the last items prioritized/implemented, as opposed to the first. The impact of the pandemic will be felt for years by providers and the people and families they serve, and at this time, any rule change that limits the ability to provide or receive a needed support should be heavily reconsidered. Additionally, the introduction of the Transformation to CIE act on the Federal level potentially makes many of the changes proposed in BEST moot as wage requirements in prevocational services will have to change along with that legislation. Additionally, many of the intended goals of BEST were to address Ohio's historical reliance on pre-vocational services and sheltered work settings. The COVID-19 pandemic has completely changed that dynamic and disrupted Ohio's service system, leaving many people no longer engaged in traditional pre-vocational services. Combined, we believe the BEST proposal is now attempting to solve a problem that basically no longer exists.

Additionally, we feel there is more work to be done on the BEST rule itself, ensuring our pre-vocational and vocational supports can serve those who, through no fault of their own, are unable to achieve competitive integrated employment, or who need to reenter pre-vocational

supports after losing or leaving a job in the community. For these reasons we feel strongly that BEST be reconsidered as the leading proposal coming out of the committee. Ohio is a national leader in community employment of people with developmental disabilities. We believe that success should speak for itself and justify delaying this type of policy change until we are safely through this pandemic and post-pandemic period.

Given our belief about this service proposal, we would like to offer the following alternative approaches;

-Revise the implementation timeline to consider the advancements on Group Employment Supports, Integrated Employment Supports and Career Planning for July of 2022. The proposed changes on these services would allow providers to expand capacity in community employment supports by instituting an appropriate and progressive reimbursement structure and simplify the supports that help people prepare for competitive employment. We believe these proposals will bolster the aims of BEST; helping people advance on their person-centered journey towards community employment.

-Reconvene BEST policy development workgroup to refine and revise rule language, incorporating the new contexts and realities that people and providers find themselves in as we emerge from the pandemic. We believe the rule language must include options and opportunities for those who are unable, through documented means, to achieve CIE to pursue meaningful employment. We also believe there is an opportunity, through further stakeholder discussions and workgroup collaboration, to truly make BEST a 'workforce development' service that helps people advance on the path to competitive employment.

-Allow for Providers to establish their own implementation timeline, with the ability to implement BEST within 2 years of the rule officially 'going live'. This transition would allow providers to internalize the rules and make appropriate business plans for how to provide services sustainably and meaningfully under the new rules. This kind of flexibility has been provided to county boards as Ohio looks to implement the Ohio Individual Service plan, giving counties a year to put the new plan in place.

We thank you for the opportunity to serve on the committee and share this feedback. We hope you will consider this request and alternative approaches for moving forward with the Blueprint workgroup. We look forward to continuing to work with you and the team at DODD on implementing the Blueprint framework.

Sincerely,



Pete Moore

Ohio Provider Resource Association