

Advocate. Educate. Connect.

November 21, 2014

John Martin, Director
Ohio Department of Developmental Disabilities
30 E Broad St, 12th Floor
Columbus, OH 43215-3434

Director Martin:

OPRA is committed to ensuring that Ohioans with disabilities have the same opportunities at life as all Ohioans. This includes promoting integrated, community employment through properly aligning our system's resources and incentives. OPRA appreciates the opportunity to work on this alignment, through our participation on the DODD Funding System Redesign Workgroup (workgroup).

The policy direction of the workgroup has been to make significant changes to day array supports that promote meaningful inclusion within the community. OPRA is excited about enhancing choice and providing an opportunity to change our current systems to ensure civil liberties are afforded to people with developmental disabilities.

We offer this letter as a candid, and hopefully helpful, assessment of the current progress of the workgroup. The experience and expertise of workgroup members and leadership are noteworthy and the commitment to systemic change is evident. However, the workgroup does not yet appear to be addressing the root causes of our current system deficiencies that have the potential to derail any attempt at substantive change. It is also apparent that the workgroup's main focus is on CMS and DOJ compliance. It seems like the workgroup is attempting to fit new models of service supports into old processes and procedures thereby adding additional complexity and mitigating our genuine opportunity for creative systemic change.

OPRA is committed to the success of the workgroup. The workgroup leadership and membership are clearly strong enough to collectively produce the desired outcomes, but only with a thoughtful course correction now that addresses the following issues.

Utilize lessons learned from existing committees/subcommittees

There are other concurrent DODD directed committees/subcommittees that have been completing specified work for some time now. Many of these groups have developed, tested and implemented some very creative strategies towards employment, transformation and best-practices. This work is valuable, yet the workgroup has not incorporated some of that success or lessons learned into their discussions.

DODD-ODD system's integration

Essential to the workgroup's efforts is a fundamental integration of the OOD and DODD systems that will require more than a memorandum of understanding between the two agencies. It will require a continual and invested dialogue between people with disabilities, OOD, DODD, private providers in both systems and county boards. The results, we believe, can be a fluid movement of traditional DD and OOD providers between systems and the creation of innovative partnerships between providers never before imagined that result in the desired outcomes.

Foster person-centered, creative and effective approaches

We need to ensure that we promote creativity for providers so they can deliver true person-centered outcomes. By not addressing the rigid system we already have, adding new services only limits the needed level of creative planning that will be essential to ensuring full community inclusion. We need to be vigilant in identifying and remediating our current system complexities and be careful not to add new bureaucratic barriers that lessen our chance of success.

Ensure rate methodologies support desired goals

The rate methodologies need to align with the desired outcomes for people with disabilities and our system. The workgroup has yet to address rate methodologies.

Address competitive employment for people living in an ICF-IID

While it is understood that the system redesign has an HCBS focus to address CMS regulations through a state transition plan, the workgroup needs to discuss the individuals who live in an ICF and would like to be competitively employed.

Statewide system

Providers and others are challenged by the lack of consistency in interpretation, process, priority and operation across counties. The workgroup needs to address how we bring about a more consistent, statewide, coherent, cost-effective and responsive administration and coordination of supports throughout Ohio.

We have a rare opportunity to fundamentally redesign employment and day service for individuals with developmental disabilities in Ohio in a person centered framework. We hope we will take advantage of this opportunity by addressing the challenges and opportunities in a holistic, collaborative approach. I would enjoy talking with you further about this. Thank you.

Sincerely,



Mark Davis
President

cc: Kevin Miller, Director, OOD
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