To: Josh Anderson, DODD

From: Anita Allen, OPRA

Subject: CareStar Options Counseling Feedback

Date: November 20, 2015

Thank you for the opportunity to provide feedback on the draft options counseling materials provided by CareStar. As discussed in the Process Work Group, the differences in service packages are complex and nuanced. We want to insure that the examples presented are detailed enough to give individuals and their families the complete picture, so that they can make a truly informed decision. The following summarizes OPRA’s feedback.

**My Day**

“A person at the county board will help you choose where you want to work” does not tell the full story. The board may assist with this (as in providing names of providers), however community employment choices are generally made with the help of OOD or a private provider as part of the supported employment service.

If you choose a facility, they *may* choose the day service program for you. However, they may offer choice. This is something that should be asked of the provider when considering service options.

There are ICF residents who are employed in the community. Again, this is a question that should be explored when individuals are choosing providers.

**My Care**

There was some confusion about the comment “Your care providers are chosen by the facility”. For medical providers reimbursed via a Medicaid card, choices are limited to available Medicaid providers. This is the same regardless of where a person lives. People who reside in ICF’s have choice in medical/dental providers. They do not all use the same providers. If the care provider comment was in reference to direct care staff, it is again, not completely accurate. In both ICF’s and waiver settings, the agency hires the staff. Both will work with individuals to find the best fit, given the availability of staff and the number of hours of service needed. The only time an individual chooses a single provider is in a situation where they are hiring an independent provider for their services.

The differences in availability/access/continuity of nursing/therapy services in waivers and ICF’s needs to be included.

The differences in medical and behavioral supports (add-ons, for example) should be explained.

Night time supports: 24/7 staff vs. no staff or on-site/on-call services should be explained.

Under Facility, there is a statement “you may not be able to change your care providers”. We are not sure what this means. You can change your Medicaid card providers, based on availability. You can request a change in direct service providers in a facility. Or if you wish, you can give notice and move. This statement needs to provide more detail to accurately reflect the reality.

**My Money**

There were numerous comments concerning the personal financial realities of ICF’s and waiver settings. The financial obligations of waiver recipients are much broader than for those who reside in ICF’s. Waiver recipients are expected to cover their cost to live, which includes food, utilities, rent, furnishings and community participation. They may need to access food stamps and other public assistance programs. We feel that this section needs more detail in order for individuals and their guardians to fully understand what the true financial obligations are in a waiver setting.

Some ICF residents do retain more money than the personal allowance. Depending on the circumstances, ICF residents can accumulate quite a nest egg. The statement “your money goes to the facility every month” isn’t accurate and needs some revision.

We recommend some description of the patient liability, Medicaid spend down and Medicaid Buy-In programs and how these could affect services.

**My Housing**

The comment that “you can choose to live alone or with other people” in waiver settings may be misleading in that many individuals do not have the financial resources to live alone. In addition, the ODDP range may not fund the amount of services needed in a 1:1 ratio, resulting in a person needing to live with others in order to get their needs met. More accurate language could be “in some cases, the possibility of living alone can be considered”.

The term “facility” of and by itself doesn’t provide the full picture. There are licensed waiver settings and ICF’s of all shapes and sizes. Some are large and stand out as specialized residences. Some are indistinguishable from other nearby homes. Maybe a description of facility could be included in the document.

It was suggested that information be added regarding finding housing in the open market: budgeting, figuring out what is affordable and picking location as well as information about roommates sharing expenses (should that be the situation).

**General Comments**

There should be a summary page (similar to the one developed by Cuyahoga and revised by the Process group) that lists all the services and explains the differences in funding streams.

Under “What is a Service and Support Administrator” we would suggest including a description of a QIDP and what their role is in an ICF.

The document does not seem to take into account that families and guardians may be assisting an individual with decision making. We had a few suggestions that two distinct documents – one for individuals and one for families/guardians might be more helpful.

We also had several comments about adding more “meat to the bone”. Some of the descriptions seemed generic and lacked the detail necessary to paint the full picture.

Dr. Chip Kobe provided us with *Guidelines for Researchers when Interviewing People with an Intellectual* *Disability*, which we feel provides helpful guidance. Although this isn’t a research project, the same principles apply. I have attached a copy of this document as well.

The document does not mention the individual’s team or consider the team process in either setting. This should be added.

The document does not address transportation at all. This should be added.

We understand that CareStar representatives have been invited to visit ICF and waiver settings to better assist them in understanding the differences in service packages. OPRA members would be happy to arrange visits and discuss services with CareStar. Please let us know if we can be of assistance.