



2/16/2024

Director Cora Steinmetz
Office of Medicaid Policy and Planning
Indiana Family and Social Services Administration (FSSA)
402 W. Washington St.
Indianapolis, IN 46204

RE: Proposed Family Supports Waiver and Community Integration and Habilitation Waiver Changes

Director Steinmetz:

Thank you for the opportunity to comment on the proposed changes to the Community Integration and Habilitation (CIHW) Waiver and Family Supports (FSW) Waiver. INARF appreciates FSSA and Division of Disability and Rehabilitative Services (DDRS) for their continued partnership throughout this process and looks forward to strengthening that partnership in the future. INARF commends the State for the importance it places on obtaining public input from a wide range of stakeholders in developing the proposed waiver changes, and we are confident that the feedback received will be carefully considered in the final development of the applications prior to submission. Please know that INARF is dedicated to assisting the state in any way appropriate to improve systems and services for individuals with disabilities.

INARF is the principal statewide trade association representing agencies that serve Hoosiers with intellectual and developmental disabilities. INARF members often play a lifelong role in the lives of those they serve by providing a continuum of services that, in many instances, stretch from birth to death and across all facets of life in their chosen community. Further, INARF and its members are committed to ensuring Indiana's system of services and supports for individuals with intellectual and developmental disabilities offers maximum options, access, and choice.

2% Annual Inflationary Adjustment

In reviewing the FSW and CIHW amendments, it states that FSSA may provide an annual rate adjustment of "up to 2%". INARF appreciates FSSA's foresight in ensuring that a future rate adjustment will not be a substantive change and is therefore easier to implement for providers and FSSA. INARF also appreciates FSSA's strong desire to continue the work initially started with the rate review matrix project. INARF asks that FSSA prioritize the full 2% inflationary increase when reviewing their agency budget and expenditures. Families, individuals that are served, and agencies are surviving on razor-thin margins. Permanently implementing the 2% annual rate inflationary increase illustrates that FSSA supports Hoosiers with disabilities and those that support them.

Behavioral Support Services

As the State continues to focus on competitive, integrated employment, it is imperative that individuals and families receive regular communication from FSSA regarding the changes being made to facility-based pre-vocational services so there is an understanding that this is a systemic industry-wide change, not a change driven solely by the organizations. INARF would be happy to partner with DDRS on communication tools providers can use to ensure there is consistent messaging regarding this important change.

DDRS has several large initiatives and projects occurring simultaneously and INARF understands communication is key for our providers to be able to accurately represent the goals that DDRS is striving to achieve for the industry. INARF is looking forward to partnering with DDRS to provide accurate, helpful, and timely communication tools to providers to ensure consistent messaging regarding DDRS goals.

Thank you for your work and the opportunity to share this feedback with you.

Sincerely,



Kathryn E. Stafford-Cunningham
President/CEO
INARF