



February 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 for the CIHW and FSW when reviewing their agency budget and expenditures following the Medicaid shortfall remediation implementation. Restoring the planned 2% annual rate inflationary increase illustrates that FSSA supports Hoosiers with intellectual and

developmental disabilities and those that support them and continues the efforts started in October 2022 to ensure adequate rates.

### **Employment 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 prevocational services so there is an understanding that this is a systemic industry-wide change, initiated by FSSA, 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.

INARF is cognizant of the fact that difficult decisions are being made at FSSA in light of the December Medicaid forecast and we welcome the opportunity to be a collaborative partner in finding solutions that continue to meet the needs of the people receiving supports while ensuring a sustainable service-delivery system.

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

Sincerely,



Kathryn E. Stafford-Cunningham  
President/CEO  
INARF