TennesseeWorks Team and Employers and Providers Workgroup

Comments on the May 30, 2014 Waiver Concept Paper

TennesseeWorks is working to increase the number of young people with intellectual and developmental disabilities (IDD) who are employed in the state. The TennesseeWorks Partnership exists to

1) create a compelling, sustainable collaborative committed to this goal;
2) Raise the aspirations and capacities of young people, their families, educators, service systems, and employers to pursue integrated, competitive work as a first choice;
3) Equip families and educators across the entire state with accessible and relevant resources, training, and supports to enable them to successfully connect youth with disabilities to early work experiences;
4) Develop a shared, cross-agency data system to enable data-driven decision making;
5) Stimulate systems and policy change statewide.

Following are the comments of the TennesseeWorks Partnership and its Employers and Providers Group:

Please tell us the top three things you like best about the proposed plan.

1) We applaud Tennessee’s Department of Intellectual and Developmental Disabilities and TennCare for innovation in providing for the long-term services and supports for persons with developmental disabilities. These new waiver options meet a long unmet need, will lead to better employment outcomes for youth and adults, and better quality of life for a growing segment of the disability community. We are pleased to see this change implemented.

2) We are pleased to see the emphasis on home- and community-based options, person-centered thinking and person-centered options, and the emphasis on choice and self-direction. The success of DIDD Family Support program over the years has shown how powerful small amounts of money can be when the funds are carefully directed by families. We hope these new waivers can be as successful on a larger scale in helping people reach their employment and independence goals.

3) We are most thrilled with the emphasis in this concept paper and in each of the waivers on integrated community employment. We believe this will help us move toward a more integrated society in Tennessee, where people will be valued within their communities.
Please tell us the top three ways you think the proposed plan can be improved.

1) We believe the plan can be improved by providing specificity on what the move to managed care will look like—how will it work? Particularly in the areas of employment, what are the experience models for managed care in the employment area? What success stories can we hear about? What might a flow chart of tasks and responsibilities look like for someone seeking work under an MCO? How would Employment providers work flow and interactions with jobseekers and supported-employment clients change? Would there be employment services provided for those who needed less support than supported employment? Would individuals choose what employment supports they wanted, or would a team help them decide what they needed? Would it be based off a Vocational Rehabilitation’s Individualized Plan for Employment? How would outcome-based payment for supports compare to the way Vocational Rehabilitation is using that approach? Would there be financial incentives and protection from harm leeway enough to allow people to work independently?

2) The proposed plan could be improved with specificity in details concerning expansion to persons with developmental disabilities with more specific details of how TennCare/DIDD plans to integrate the expansion of the new waivers to people with DD other than ID when there are currently over 7000 people with ID on a waiting list for services. Issues would include priorities, definitions, eligibility and meeting their diverse needs.

3) The proposed plan could be improved by specificity in the area of planning and guidance of service plans. It is not clear who will be involved in the planning of services for individuals, who will be responsible for convening a Circle of Support, and who will be responsible for conducting person-centered planning when needed. Are independent support coordinators or case managers going to have a place in the new system? Will there be go-betweens for individuals being served and the MCOs serving them? Who will be responsible for employment-related planning like discovery, guiding and supporting job searches, career planning and career advancement?
Please tell us your top three concerns with the proposed plan.

1) Of major concern are the assessments and functioning levels that will be used to determine whether one qualifies to receive long-term services and supports.

2) To many in the disability community, the frequency of reference in this concept paper to medical facilities, hospitalization and other medical model terms was distressing. TennCare and DIDD did stress their commitment to home- and community-based settings and to reducing the number of people in nursing home settings, and we recognize that the Medicaid funding language is from a medical model. We want to express our DEEP concern that Tennessee not go backwards into viewing people with disabilities as people with diseases to be cured, but rather to stay true to our more enlightened vision of people with disabilities as people first, deserving of person-centered planning and living in the community.

3) While we are thrilled to see such an emphasis on employment, we have concerns about getting the details right. It can be complicated under the current system for a person to move from getting supports from the DIDD system, then from the VR system and back to the DIDD system, then transitioning into workplace Natural Supports. Will the MCOs understand the nuances and systems well enough to navigate those shifts? Or will those shifts be negotiated out of existence? As another example, we are pleased to see the Self-Directed Waiver, but it can also cause some creative budgeting that can impact employment retention. For example, when someone is working and receiving employment supports and also needs Personal Assistance supports, if there is not enough money to go around, the individual/family then has to decide what will be cut back. If they cut back on the employment/job supports and only work 2-3 days per week, then this can interfere with retention. We want to encourage the waiver developers to work closely with VR, TennesseeWorks, TNCO, The Arc and other agencies that have good track records in best practices in employment. We also welcome the opportunity to begin working with the MCOs that will be directing employment services.

Thank you for the opportunity to provide these comments. Should you like to speak with a representative of our TennesseeWorks Partnership Team and the Employers and Providers Workgroup, please contact Lynnette Henderson at (615) 936-0448 or Lynnette.henderson@vanderbilt.edu.