

CDCS Waiver Amendment
4/1/02 Version

B1 SERVICE DESCRIPTION

TO ACCESS CDCS:

Bullet 2

"The consumer or their rep may delegate these tasks" refers to 'selecting, training, and evaluating the provider.' What is consumer directed if these tasks are delegated agencies? The choice of the agency seems to be the only consumer directed matter....

Bullet 3

"If.... the rep is not acting in the consumer's best interest... may contact and involve.....other third party." Will they use the established agencies that provide protection for vulnerable people, or does this mean they can muscle parents and people with disabilities into decisions they like by stacking the team? The independent living movement insists that freedom allows people and their families to make mediocre decisions.... that quality is measured only in terms of civil rights and people with disabilities get to make bad choices.

Bullet 4

If this amendment goes over all the waivers, adults on CADI would have to make all of their private, personal activities including those unrelated to publicly reimbursed supports part of the public record. Where are the boundaries?

Bullet 6 and 7

These seem to conflict.... 6 states that consumers/ reps set qualifications while 7 refers to required qualifications. This begs the question, required by whom? This could be a matter of wordsmithing and not intentional limitation, or not...

Bullet 8

Do consumers determine all criminal background check procedures? Will they not comply with the minimum standards of DHS licensing?

SERVICE REQUIREMENTS

Bullet 1

This states the agency determines provider qualifications, not the consumer. See above bullets 6 and 7, TO ACCESS CDCS.

Bullet 2

How will financial fraud history be determined?

Bullet 3

This states that state plan services must not be duplicated. Does this mean that state plan services such as PCA cannot be consumer directed?

Bullet 7

How will this operate for the waivers that include Meals on Wheels?

SERVICES AND ITEMS EXCLUDED FROM CDCS

Bullet 2

This excludes PCA, HHA and PDN from consumer direction

Bullet 3

This excludes Meals on Wheels from consumer direction. This is a service widely used on CADI.

BUDGETS

The first factor listed to determine budgets is service history. For those who have been historically under served considering service history allows the system to perpetuate affects of existing barriers.

PAYMENT MECHANISMS

Why is it consumer direction if the agency hires, trains and evaluates providers? This particular option seems to be a concession to existing PCPOs who have adopted consumer directed language and continued to operate just as before.

B2 PROVIDER QUALIFICATIONS

See above. This seems to conflict with consumer direction since all provider qualifications must comply with "all applicable standards." People who want to train their own human assistants to support them as they choose will still have employees who are trained to do specific tasks and not others... This is the opposite of consumer direction.