August 13, 2019
Appropriations Committee Human Services Public Hearing Testimony
Julie Peters, Executive Director, Brain Injury Alliance of Connecticut

Chairpersons and Members of the Appropriations Committee. My name is Julie Peters, Executive Director at the Brain Injury Alliance of Connecticut. I am submitting this testimony regarding the renewal application for the Acquired Brain Injury II Waiver (ABI II) and amendment to the Acquired Brain Injury Waiver (ABI I).

BIAC supports the amendments to Waivers I and II because we believe that these changes are positive and will serve to enhance overall service provision and outcomes to waiver participants. Specifically for Waiver II:

1) Mandatory annual training for Independent Livings Skills Trainers (ILST) of 6 hours:
   BIAC supports this requirement. This is the minimum we should expect from those who are working with individuals with brain injuries. Most professions have CEU requirements for credentialing, and it is not unreasonable to expect that all professionals maintain ongoing education and professional development on an annual basis. Every day we learn more about brain injuries and it is imperative for all providers to stay current on the most up to date information and best practice models.

2) ABI Group Day – BIAC supports the addition of the new provider credential of Certified Adult Day Health Provider to be added to the list of authorized providers of ABI Group Day Services. This will expand those who can provide this service. Allowing for more approved credentialed provider entities is a benefit to waiver participants. It is our understanding that DSS has had difficulty attracting providers to develop and implement this waiver service, and this change will make the service available to more people. We believe that ABI Group Day is an important and viable option for many waiver participants, and we support any change that will facilitate greater utilization of this service. Having a greater pool of authorized vendors from which to choose is also in direct alignment with CMS and CT DSS mandates for person-centered choice.
3) Changing the name of Specialized Medical Equipment & Supplies to a new name of Assistive Technology – BIAC supports this change. This new title better reflects the scope of service and coverage that is currently available to waiver participants. Nothing is being taken away from people. Individuals will still have access to medically-necessary medical equipment under the Medicaid state plan.

BIAC also supports the proposed amendment to add 10 reserve slots for current ABI Waiver I participants who are unable to self-direct their Personal Care Services and choose to move to Waiver II so that they can secure agency-based PCA services. We support this amendment because it is in full alignment with person-centered choice and will directly benefit the waiver participant who is unable to manage his/her own PCA services. There is no obligation nor forced transition involved – this change will allow a person to choose to make this transition from Waiver I to II if they wish.

Our biggest concern regarding ABI Waiver II is not addressed in these proposed amendments, however. There continues to be a significant waitlist for Waiver II, with over 85 people currently waiting for an available slot, and the average wait time is over two years. This is almost double the number who were on the waitlist when ABI Waiver II was enacted in 2014. This is unacceptable. Ever since the Olmstead Act was passed in 1999, the State of Connecticut has recognized that individuals with disabilities have a right to live in their own homes with appropriate services. We also know that Connecticut’s long-term care facilities are unable to serve individuals with brain injury appropriately. In many instances, individuals have no other option than to go into institutions to access the Waiver through MFP. I strongly ask the legislature to consider adding additional slots to Waiver II so that more people can safely remain in the community.

Everyone deserves the right to live in the community with appropriate supports. Please approve the ABI Waiver II renewal with amendments to ABI Waiver I and increase the number of slots so this can be a reality for more Connecticut citizens.

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Executive Director
Brain Injury Alliance of Connecticut