



STATE OF CONNECTICUT
DEPARTMENT OF SOCIAL SERVICES

January 6, 2016

Mr. Richard R. McGreal
Associate Regional Administrator
Department of Health and Human Services
Centers for Medicare and Medicaid Services
JFK Federal building, Government Center, Room 2275
Boston, MA 02203

Dear Mr. McGreal:

On October 13, 2015, the Centers for Medicare and Medicaid services approved the Department of Social Services' (DSS') evidence package for the waiver for adults with Acquired Brain Injury (ABI) (CT 0302. R03). DSS identified three areas that fell below the required eighty-six percent (86%) compliance threshold. These included: evidence that waiver participants were advised of the full range of services; timely completion of annual reassessments; and the presence of emergency backup plans.

Within the body of the evidence package, DSS cited significant staffing shortages and a statewide hiring freeze, both of which continue to affect performance to date, as the root causes of our inability to meet the performance targets specified in the waiver. As you are aware, we proposed to remedy the above deficiencies by competitively procuring qualified providers of care management and transitioning to a fully outsourced model of care management. In doing so, we will be adopting a model that has worked successfully for other Connecticut waivers.

As is required, DSS staff published notice, held a 30-day comment period and went before our legislative committees of cognizance on December 17, 2015, seeking approval to submit amendments to both of our ABI waivers CT- 0302 and CT-1085. Unfortunately, based on procedural concerns relating to contracting externally for these services, the committees denied DSS' request to submit the amendments.

While we expect to again pursue committee approval of the amendments, we feel that it is important to inform you that, on the basis of the above referenced staffing constraints, we do not expect to be able to meet the quality measures outlined in the waiver, and may even see a reduction in our level of performance. Further, we are not presently able to provide sufficient staff support to activate new clients on the 13 new waiver slots that would otherwise be made available, on the basis of availability of funds, over the course of 2016. This will mean that the involved individuals will remain on the waiting list.

DSS acknowledges our accountability to the waiver performance standards and to activate new clients on available waiver slots as funding allows. Notwithstanding, we do not have present staffing capability to meet these obligations. We hope to resolve this with the committees in the near future, but want to clearly communicate our current circumstances. Please let me know if I can provide any additional information or if you wish to discuss this further.

Sincerely,

A handwritten signature in black ink that reads "Kathy Bruni" with the initials "(KB)" in parentheses to the right.

Kathy Bruni, MPA, LCSW
HCBS Program Director

KB:scs