



Office of Policy and Management
Benjamin Barnes, Secretary



Department of Social Services
Roderick L. Bremby, Commissioner

January 13, 2016

Dear Ms. Burns:

All approved Connecticut Medicaid waiver documents, including the Acquired Brain Injury (ABI) Waivers I & II, memorialize the maximum number of slots approved by the Centers for Medicare and Medicaid Services (CMS). Distinct, but related, capacity to fill any and all waiver slots is dependent on sufficient appropriation of the state share of funds for such slots.

The following two examples illustrate this distinction:

- There are many more slots approved by CMS for the Department of Developmental Services (DDS) than can be made available to individuals on the waitlist due to the current level of appropriated funds.
- Under the Katie Beckett waiver, newly approved slots had to be made available on an incremental basis due to availability of budget.

The Department of Social Services (DSS) is not obligated to make all waiver slots available immediately as it is not a guaranteed entitlement. DSS will make available ABI Waiver II slots as budget and staffing capacity permits, over the course of 2016. DSS will continue to adhere to all requirements of the approved waiver document in serving individuals from the wait list. However, it is important to distinguish that at this time the Department is technically out of compliance with CMS. After reviewing an ABI waiver quality report, CMS specifically noted the Department's deficiency in the timely performance of annual reassessments. On October 2, 2015 the Department promptly submitted a remediation plan to CMS specifically outlining the Department's intention to move forward with a Request for Proposals through which a qualified contractor or contractors would be selected to perform the requisite and necessary case management services. CMS approved the Department's responses to this quality report, including the RFP solution on October 13, 2015. As part of the Department's commitment to transparency, the Department has alerted CMS about the legislature's rejection of the waiver amendment to allow the RFP and case management services transition to move forward (see attached).

Further, DSS expects to refresh its request that the committees of cognizance to approve its proposal to competitively procure a conflict-free source of care management support for the ABI Waivers. On that basis, DSS is maintaining its present arrangements with respect to support for current clients.

Sincerely,



Benjamin Barnes
Secretary
Office of Policy and Management



Roderick L. Bremby
Commissioner
Department of Social Services