June 11, 2019

To: Colorado Medical Services Board
From: Alliance
Re: MSB 19-04-16-A
cc: Bonnie Silva, Brittani Trujillo, Heather Fladmark

Dear Madame Chair and members of the Medical Services Board,

On behalf of Alliance, I write today to express concerns about the HCPF provider-search website as you consider MSB 19-04-16-A, a rule articulating processes for case management services for waiver participants including people with intellectual and developmental disabilities (IDD). Over the past year, we have been discussing these concerns with the HCPF case management division. We would like to thank HCPF for listening to our initial concerns and making some changes to the "Find a Doctor" website. Unfortunately, it still needs significant improvements or a complete redesign in order to be effectively used.

Given that the rule before you today would reduce the use of what is known as the request for proposals (RFP) process and encourage the use of the provider search website, we believe it is imperative to fix or redesign the search tool by the time the rule takes effect. We previously shared more than 10 pages of identified issues with HCPF staff. This letter summarizes those concerns. We have also shared a variety of recommended changes to the proposed rule language with HCPF staff and look forward to working with them between now and July on those changes.

Proposed Provider Selection Rule

The proposed rule would alter the provider selection process by dramatically reducing the use of the RFP process in favor of what, in an ideal world, would be more tailored assistance from case managers. We can all agree the current RFP process is not perfect, and we understand the good intention behind the proposal. However, in the absence of a robust provider-search tool, the RFP process provides the most thorough, timely, and unbiased information about the choices available to an individual seeking services. Without such a tool (either web-based or an RFP), we believe that case managers will have difficulty providing individuals with true informed choice because they will be unable to know which of Colorado's ~500 PASAs can provide support to meet their needs. The current "Find a Doctor" webpage and CDPHE's list of PASAs are not sufficient tools to assist case managers in effectively matching individuals with qualified providers.

We have identified the following primary concerns with HCPF's existing provider search tool:

- **Medical model terminology for those receiving waiver services**. The landing page, titled, "Find a Doctor," perpetuates a medical model of service delivery that home- and community-based IDD services have been moving away from for decades. The site lumps waiver services in with all other medical services and uses culturally inappropriate terms such as "patients", "mental retardation", and "developmentally disabled" as labels for people and services. The use of these terms is inconsistent with the department's own person-centered philosophy and national trends to move away from such language.

- **An unintuitive search mechanism that is difficult to navigate.** In order to know which boxes to check to filter provider results, one must know technical waiver language which is not familiar to the general public. For instance, if a person knows their family member needs help with getting dressed in the morning, they would need to select between "Personal Care – CCT", "Personal Care", and "Pers Care/Home Svcs", with each likely yielding different search results. This perpetuates the need for people to rely on professionals in the system to access even a basic list of providers in their area. In a day when we all have numerous applications that allow us to filter results tailored to our every preference and need, this is a disservice to waiver participants and, we believe, makes a statement that Medicaid undervalues the desire and ability of people and families to meaningfully participate in the provider selection process.

- **Inaccurate search results.** The bulk of the 10+ pages of issues we submitted to HCPF centered around the numerous inaccuracies that we encountered when we tried to use the tool. For example, one IDD provider is listed as a surgical center. Some providers aren't listed at all or are listed under the incorrect name. For some, the incorrect services are listed, or the site reflects only one of their several locations. There is no way for providers to update information about the services they currently provide versus the array of services they are approved to provide. Given these issues, chances are low that the site's search results will yield even a few leads, not to mention the full array of choices available to searchers.

As a result of these issues, we worry that Case Managers will, not out of a lack of integrity or effort, but purely out of lack of resources, develop a list of "preferred providers" that they know and will refer individuals to only those agencies. This natural human tendency is even more likely in a field that suffers from high turnover and increasingly complex job responsibilities. For these reasons, we are concerned that there will be an abbreviated, biased provider selection process with the potential for conflict of interest, and people with IDD and their families will not be aware of all the choices available to them.

Alliance wants to ensure provider selection is a fair and unbiased process that puts maximum control in the hands of the person accepting supports and their family. We believe the best way to accomplish this is to create a statewide, person-centered, IDD-specific, web-based provider search tool that can be used by case managers, providers, advocates, families, and people receiving services.

Alliance cannot promote or support the "Find a Doctor" website until most of the described issues are corrected. Alliance is willing to work with HCPF and our IDD partners to explore third-party vendors that could create an effective and user-friendly tool for the IDD community. As we noted in past meetings, Ohio's Division of Developmental Disabilities created an effective tool specific to the IDD community that could be a model for Colorado. Please visit ProviderGuidePlus for more on the Ohio tool.

As always, Alliance is willing to partner with HCPF and our IDD advocate partners to help strengthen the supports and services for people with IDD. Feel free to contact me, or the Alliance Board President Cheryl Wicks cheryl.wicks@mosaicinfo.org, if you have any questions.

Sincerely,

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