

Nursing on the IO Waiver: Who, What, Where, When and How?

The Office of Health Transformation's summary of Executive Budget proposals for the Developmental Disabilities service system states that "a nursing service will be added to the IO Waiver to provide direct services from a licensed nurse to individuals with complex medical needs who require skilled care."

How this licensed nursing option will be provided remains a mystery...

- The federal government allows for ancillary services to be added to a waiver, but it also makes clear that a waiver recipient's Medicaid card state plan services must be exhausted before ancillary services can be tapped.
- Therefore, individuals on the IO Waiver who require licensed nursing must use up the 14 hours per month of nursing available through their Medicaid card with a home health care agency.
- It is unclear what approval process IO Waiver recipients will undergo to access licensed nursing through the waiver once their 14 hour per month Medicaid state plan service has been used.
- It is equally unclear what the certification process will be for waiver providers to add nursing to their existing IO Waiver certification.
- The State has proposed to pay the state match for individuals transferring from Intermediate Care Facilities (ICF) homes to the IO Waiver and for new IO Waiver recipients coming off the waiting list. The County Boards would be responsible to pay the match for existing IO Waiver recipients.

Additional challenges to consider...

- Licensed nursing is very difficult to find for individuals with developmental disabilities through a home health care agency as licensed nurses prefer positions with hospitals, ICF homes and nursing homes. Additionally, these agencies specialize in elder care and rehabilitation.
- It would be especially hard to find licensed nursing through waiver providers since nursing has not been available on the IO Waiver previously.
- Given these challenges, it is unclear how individuals requiring 24-hour licensed nursing, or other significant amount of nursing, will access this service through the IO Waiver. Furthermore, there is real concern that, in practice, this "licensed nursing" will take the form of delegated nursing.

DAA is deeply concerned that the Department of Developmental Disabilities (DODD) and Disability Rights Ohio (DRO) are actively encouraging parents, guardians and ICF providers to transfer their children and residents from an ICF home setting to an IO Waiver setting when so many questions still surround the provision of licensed nursing through a waiver. That DODD and DRO have proposed policies in the Executive Budget which will lead to the elimination of ICF beds, the closure of ICF homes and the forced dislocation of ICF residents is greatly disturbing given that a commensurate IO Waiver service in the community has not been established, let alone even tested.

These actions demonstrate a callous disregard for the health and welfare of ICF residents and reinforce the reason parents and guardians have the legal right to determine residential placement for their vulnerable children.

DAA urges legislators to listen to the voices of concerned parents, guardians and ICF providers who fear for the health and safety of their fragile children and residents under the proposed Executive Budget. Please remove policies from the Executive Budget which seek to "close the front door" of ICF homes and divert ICF home admissions.