

To:

I write today about the injustices that will be caused by HCPF OM 20-099. This Memo/regulation is in direct conflict with the concept of client centered, client directed services that the state of Colorado has been working so hard to achieve in the I/DD population. It also puts our most vulnerable population at risk, as well as Colorado's struggling day and residential providers.

In short, HCPF has capped all SIS levels for SCC and Spec Hab (day program) services at \$5,220-\$29,533 annually. The amount available prior to December 4 was \$15,006- \$49,824 (depending on level and waiver). The previous rate enabled the household heads to be able to go to work full time to support the family safely. Now the families will have to choose someone to stay home with their I/DD family member, slashing the families budget up to half or risk that family member coming to harm when left with insufficient supervision and facing subsequent neglect charges. No family should have to make that choice.

For other individuals with I/DD, this severely limits their access to their communities and peers, resulting in an increase in mental health issues and a decrease in the skills and independence these services helped foster. Additionally, families and caregivers will become fatigued. Provider burnout can only result in increased requests for emergency placements, which are already exceedingly difficult to fulfill.

This is a very short sighted and misguided attempt to regulate what doesn't need regulation. I/DD community members should be allowed to decide how to spend the small amount of money allocated to them for services (approx. \$13 – 15,000) in the manner that serves them best and not be dictated to by bureaucrats.

Additionally, it destroys day programs and causes enormous hardships to host home providers. For Day Program Providers this means for every client they currently serve they will need two more, without increasing staff costs, to maintain the same revenue they had in 2019. Even if delivery of these services was not already significantly impacted due to Covid-19 creating a huge financial shortfall, this scenario is not workable and is going to lead to short staffing for large Day Programs and **will put small Day Programs out of business quickly.** Programs were already suffering from staffing shortages due to low pay and high burn out/turnover rates. It is not possible to increase the number served without increasing the number of staff needed to ensure the health and safety of individuals. How will any program be able to be person centered and provide quality service under this type of economic pressure?

HCPF OM 20-099 is a menace to the I/DD population, their families, their Day Program providers, DSP staff, and host home providers! **PLEASE** do everything you can to undo the injustice of HCPF OM 20-099.

Sincerely,