



**Disability  
Advocacy  
Alliance**

Via Electronic Mail

August 12, 2022

Director Maureen Corcoran  
Ohio Department of Medicaid  
500 W. Town Street, Suite 400  
Columbus, Ohio 43215

Director Kim Hauck  
Department of Developmental Disabilities  
30 E. Broad Street  
Columbus, Ohio 43215

President Steve Licciardi  
OACB Board of Trustees  
73 E. Wilson Bridge Road, B-1  
Worthington, Ohio 43085

Director Adam Herman  
OACB  
73 E. Wilson Bridge Road, B-1  
Worthington, Ohio 43085

Dear Director Corcoran, Director Hauck, President Licciardi, and Executive Director Herman:

We write in regard to your latest initiative to improve services for individuals with intellectual and developmental disabilities. On July 13, 2022, you announced that the County Boards, with a federal match, will invest an additional \$143 million annually to provide retention bonuses to direct service professionals (DSPs) who care for individuals receiving home and community-based “waiver” services. We are curious as to your plans for a commensurate funding increase to retain DSPs who work in intermediate care facilities for individuals with intellectual disabilities (ICFs). The ICF program is an important component of the DD system, but your July 13<sup>th</sup> communication did not mention it. ICF residents are your constituents and count on your dedication and open hearts to also ensure their care needs are properly supported. Likewise, the DSPs who care for ICF residents perform particularly difficult work often addressing highly complex care needs. DSPs in ICFs are equally deserving of a competitive wage. We ask, then, why are DSPs in ICFs excluded from efforts to address high turnover? There is a grave disparity here that gives the appearance of an effort to promote one form of care over another. Ultimately, this has the effect of discriminating against the most severely and profoundly disabled members of your service system who need intensive supports in ICFs.

Families are told that the County Boards of DD are the “front door” to the DD System, but that front door, at least at present, appears to be closed to ICF residents. By increasing funding for DSPs in HCBS settings while not giving a commensurate increase to DSPs in ICFs, the State and County Boards incentivize DSPs to leave ICFs to work in HCBS settings. To propose such largesse for one group of constituents without addressing the equally compelling needs of another group is disheartening to families who support DD Boards with our volunteerism and tax dollars.

Unfortunately, this oversight is but a manifestation of a County Board system that is rife with conflicts of interests. DD Boards receive case management fees for individuals who receive waiver services and for ICF residents who commit to move out of an ICF. As such, the \$143 million investment by County Boards will come back to the Boards in dollars and cents to the

extent that the investment expands opportunities for County Boards to provide case management, whether through increased HCBS services or closures of ICFs. OACB is benefited indirectly because County Boards fund OACB with membership fees. As long as Ohio's "front door" is so heavily weighted towards one form of care, the interests of ICF residents are not protected. It's fair to ask, when this latest initiative was negotiated, who at the table, if anyone, represented ICF residents' interests?

The past few years have been a particularly difficult time for all Ohioans. Arguably, the DD community has been particularly hard hit. We were told that we are all in this together. We ask you to show us that this is not just words. We would like to meet with you to hear how you will also protect the interests of ICF residents in the wake of the disparity that has been created.

We urge the State of Ohio and its local Medicaid agents, the County Boards, to open your hearts to individuals who reside in ICFs, just as you shower love on individuals residing in community settings. As parents, guardians, and family members, we can attest to the love and enrichment you will receive in return.

Sincerely,

Caroline Lahrman  
Rich Klein  
Dan Jones  
Disability Advocacy Alliance  
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CC: The Honorable Mike Dewine, Governor of Ohio  
Chairman Mark Romanchuk, JMOC  
Vice Chairman Thomas Patton, JMOC  
Ranking Member Thomas West, JMOC & House Finance Subcommittee on HHS  
Chairman Matt Dolan, Senate Finance Committee  
Ranking Member Vernon Sykes, Senate Finance Committee  
Chairman Scott Oelslager, House Finance Committee  
Ranking Member Phil Plummer, House Finance Committee  
Chairman Bill Roemer, House Finance Subcommittee on HHS