The Developmental Disabilities Alliance of WNY (DDAWNY) thanks OPWDD for the opportunity to comment on the draft Administrative Memorandum regarding Certified Residential Opportunities (CRO) issued on July 19, 2022. While we recognize and agree with the intention to standardize the process for residential referrals and placement throughout the State, we have many concerns with the guidance as written. DDAWNY believes the directive lacks consideration for person-centered thinking, fiscal issues, workforce and the rights of people already living in established homes. Below is a listing of our concerns:

ADM specific concerns:

* Face to face referral should not be required.  Some referrals clearly won’t be a fit at a home (e.g. Deep suctioning, wheelchair bound in non-accessible home).  Also, the ADM should include virtual interviews.  Many providers successfully admitted people during COVID relying on virtual tours/interviews
* The proposed weekly Emergency Need list should include the Significant Need list.  Those on the SN list are one step away from a crisis and likely should not wait till the crisis occurs
* There should be mention of negotiation for admissions, so that someone can be chosen who will be a good match for the current residents in the home and can be successful based on the composition of the home
* The ADM focuses on voluntary provider accountability, but accountability on the part of the AROC and CCO are critical for this to be successful
* Do regional offices have the resources to follow the ADM?
* Consider using CHOICES for housing the referral packet/documents.  CCOs would upload the documents, and providers could access the documents themselves
* Packets should not be sent back to an agency every 90 days, it should be 180 days
* The links in the ADM don’t work
* A two week turnaround for referral responses is not realistic, it can take much longer to connect with the care coordinator, and schedule interviews and tours
* Lacking criteria to move individuals between residential support categories (e.g. when an individual/family on EN list turns down several opportunities offered)

AROC specific concerns:

* Providers have a large number of vacancies
* Vacancies are taking a long time to fill and causing voluntary budget shortfalls
* There are multiple repeat rejections to get to a bed filled
* AROC sends referrals that are contrary to an agency’s Site Profile, time could be saved by referring based on site profile parameters.  This results in very long delays in admissions, examples include HUD requirements, children’s home requirements, geographic preferences of families
* Agencies get referrals without HCBS or Social Security enrollment, and/or lacking an assigned care coordinator
* AROC meetings should include DDRO State Ops residential providers as some referrals require a State Ops admission
* Supportive Apartment referrals are very sporadic, and the beds stay open a very long time
* Do the Regional Offices have the resources necessary to follow the ADM?
* There are multiple repeat rejections to get to a bed filled
* Emergency Need list should include the information it used to include: ambulation ability, desired geographical area, some basic health or behavioral information – that will assist agencies in requesting appropriate packets

AROC and CCO specific concerns:

* Referrals are outdated, including old assessments and old information
* Referrals are missing necessary information to make an appropriate decision on a potential admission
* Referrals lack current care coordinator information
* Referrals lack CAS assessments, social security enrollment, and HCBS enrollment
* Admissions can occur based on old or inaccurate information, which can lead to very rocky placements without a mechanism for reassessment of placement
* CCOs at times require additional HIPAA sign-offs for a provider to review referral documents

DDAWNY believes that this ADM will further complicate and slow down the ability of agencies to support people in need. We suggest that the statewide CRO Workgroup re-convene to review all comments and make necessary revisions to OPWDD and voluntary agencies must work together to create a process that will be efficient and equitable for all.

Please direct any questions to:

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