

Transition Management and Transition Services

DOCKET NO. 16-0310-1802

Public Comments and Department Responses

Public Comment Period: September 5, 2018 through September 26, 2018

Verbal and written comments were submitted by the following individuals/organizations: James Price, State Hospital South; Marilyn Sword, Idaho Caregiver Alliance; Chris Johnson; Karen Westbrook, Adult Developmental Disability Services.

| W-Written V-Verbal | Comments | Responses | Policy Change |
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| W | <p>“Eligible participants include those who have been in a qualifying institution for 45 “Medicaid-reimbursed” days. IMDs are listed as qualifying institutions. The only adult patients in an IMD, however, who are actually reimbursed by Medicaid are those minor adults aged 18 to 21 and elderly patients aged 65 or more. As I read the proposed rule, then, adults aged 22 to 64 who are in an IMD would not qualify for the transition services. If the intent was not to exclude that population, the wording may need to be changed to include them.</p> <p>The 45 day rule will also limit those who qualify. Our median length of stay for adults is 35 days, so more than half of our patients would not qualify for the services.”</p> | <p>The Department is unable to offer Medicaid-reimbursed services to participants aged 22 to 64 who are residing in institutions for mental diseases (IMD) due to limitations defined in the Social Security Act.</p> <p>The grant currently offering these benefits included a defined 90-day length of stay requirement We are proposing a shortened length of stay requirement to 45 days. We have successfully transitioned participants from IMDs during the grant and hope to continue to assist more individuals with the proposed benefits.</p> | No change required. |
| W | <p>The Department received a comment requesting the addition of “unpaid family caregivers if available” to draft rule text regarding Transition Management and provided a definition of caregiver as “<i>“Caregiver” means an individual at least eighteen (18) years of age who is designated as a caregiver by a patient pursuant to this chapter and who provides unpaid aftercare to a patient living at home.</i>”</p> | <p>We will include a modification to our proposed rule text to define that participants have the option to involve other individuals in the transition process.</p> | Yes, modified proposed rule 16.03.10.350. |

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| V | The Department received verbal comments from a public hearing attendee in support of the proposed rules. The attendee commented that she has been a Transition Manger since the beginning of the program and has seen the benefits positively impact participants in numerous ways, such as enabling people to return to their communities and sustain partial employment. She commented that whatever Idaho can do to sustain the program and increase the momentum would be wonderful. She also specifically noted that transition service funds were vital to helping participants get their household set up again, and that transition management has played an important role in helping participants to navigate and leverage appropriate resources in the community. | Thank you for your comments and support of the proposed rules. We agree that the current program has an important impact in increasing the ability of individuals to successfully move to and remain in the community. | No change required. |
| W | The Department received written comments indicating IDAPA 16.03.10.703.15 refers back to a service definition for “Transition Services” outlined in IDAPA Subsection 326.17. Modifications to proposed rule text in IDAPA 16.03.10.703.15. were requested to ensure clarity for the Adult Developmental Waiver program. | We will modify the current proposed text for IDAPA 16.03.10.703.15. to incorporate the service definition for Transition Services as outlined in IDAPA 16.03.10.326.17. | Yes, modified proposed rule 16.03.10.703.15. |
| W | The Department received written comments indicating IDAPA 16.03.10.705.15 refers back to provider qualifications for “Transition Services” described in IDAPA 16.03.10.350. Modifications to proposed rule text in IDAPA 16.03.10.705.15. were requested to ensure clarity for the Adult Developmental Waiver program. | Reference to IDAPA 16.03.10.350. is necessary in IDAPA 16.03.10.329.22. and 16.03.10.705.15. to define that Transition Services cannot be furnished by any provider that is not a Transition Manager. | Yes, clarified the citation to be more specific. |
| W | The Department received written comments proposing minor text revisions to IDAPA 16.03.10.350. | We will include some of the suggested revisions for IDAPA 16.03.10.350. as appropriate. | Yes, modified proposed rule 16.03.10.350. |