



Suzanne Sewell
President & CEO

Barry Pollack
Board Chair

January 13, 2010

James DeBeaugrine, Director
Agency for Persons with Disabilities
4030 Esplanade Way
Tallahassee, FL 32399

Dear Mr. DeBeaugrine

In September 2009, Florida ARF's membership's adopted the position that the iBudget process could offer promise for Florida's DD System providing certain conditions are met:

- iBudgets must be based on assessed need using a valid assessment tool.
- Implementation of iBudgets must include a Safety Net factor similar to what the Georgia system featured to prevent drastic changes in cost plans and should not increase or decrease more than 5% during year one as a result of iBudget adjustments. Out years should have graduated reductions until implementation is fully achieved.
- A provision must be in place to allow for individual changes in life circumstances.
- Any systems change should only be based on enrolling new individuals through attrition until additional dollars are available to financially support new enrollees. The Association cannot support the philosophy that everyone on the wait list should be served within the existing DD Medicaid Waiver appropriation. The addition of new individuals to the waiver should be based on adequate funding that accompanies new enrollees.
- The current service system does not cover the actual cost of care which means the iBudget process must be implemented cautiously. While factors such as living site and diagnoses will certainly influence service plans, the State's effort to ratchet down service rates has compromised the integrity of the rate structure adopted in July 2003. This is of particular concern for individuals who require residential care.

Our membership appreciates the work that has occurred and the opportunity to provide input; however, we must see additional information to resolve questions and concerns before we can sign-on as supporting the iBudget process. Specifically, we request the following information:

- A definition of "off-the-tops" referenced in the draft report including proposed set asides for deficits.
- Definitions and or data to identify or categorize "outliers" and projected cost plan totals for those classified as outliers.
- Projected set asides to address errors in placements or life changes and projected expenditures to cover administrative functions such as a new data system.
- Data showing anticipated changes in cost plans by geographic area.

- The algorithm that has been developed, the weight of the variables used in the algorithm formula and an explanation as to how the assessment process will generate data that supports the variables used in the algorithm formula.
- An explanation of how “allocated equitably” is to be determined.
- Systems change assumptions that are being factored in to the process such as: Will there be a maximum amount APD will pay for waiver recipients?

Considering today's economic climate, this is a very challenging time to roll out new budgeting models, and we encourage the Agency to move cautiously to ensure that the iBudget system is implemented in a manner that truly benefits individuals with developmental disabilities. We also encourage APD to conduct impact evaluations and give consideration to the system the State of Washington ran which was to conduct a “paper demonstration” alongside its existing service system for one year to compare actual service costs to the new system, thus giving decision makers the opportunity to objectively weigh the impact of the new budget process.

We look forward to discussing these issues with you at our February meeting in Clearwater Beach on February 2, 2010. If you have questions about the above, feel free to call me at 850-877-4816 (#123).

Sincerely,



Suzanne Sewell
President & CEO

Cc: Dr. Sherry A. White
Florida ARF Representative