



**AADD**  
**ALASKA ASSOCIATION ON**  
**DEVELOPMENTAL DISABILITIES**  
**P.O. Box 241742**  
**Anchorage, Alaska 99524**

***To facilitate a united provider voice for best practices, advocacy, partnerships and networking.***

March 30, 2016

Dear Representative Vasquez and Representative Seaton,

The Alaska Association on Developmental Disabilities (AADD) is the voice of over 30 providers offering developmental disability services through the Home and Community Based waiver system. The members of this association offer services to individuals of all ages in communities throughout Alaska.

AADD has serious concerns related to HB315 which would require electronic visit verification (EVV) for providers of personal care services and home and community-based services. We strongly feel this requirement would increase the cost of providing services without demonstrating cost savings to the State of Alaska or service providers. While HB 315 may be a logical direction for consumer-directed PCA services, we do not agree that this a logical requirement for Home and Community-Based Services.

To be compliant with the requirements of American Recovery and Reinvestment Act 2009, Home and Community Based providers were required to maintain electronic health records. Agencies have invested in different forms of electronic record-keeping and workforce management systems at a significant cost, not just in the initial purchase but the ongoing operational cost, including staff training and quality assurance systems. The Division of Senior and Disabilities Services (SDS) has indicated that there are sufficient controls in monitoring the agency-based service records available for compliance purposes. If a separate EVV system were required by the Department, the agency electronic records systems could not be simply replaced as they also provide HR and other agency support modules. Requiring duplicative systems would be a hardship across the system, especially on SDS which has experienced significant staffing reductions during the past year. Duplicative reporting processes will escalate administrative burden for the State of Alaska and medical assistance providers as they attempt to reconcile multiple systems. For small providers, particularly for those in rural and remote areas, real-time access to an EVV would be extremely difficult and possibly result in agency closures. This requirement will undoubtedly increase the cost of doing business.

The requirement for HCB service providers to document each visit with both the agency's electronic record and at the EVV site (as Texas required) is unreasonably demanding in a time of all of us having to "do less with less". Additionally, the increased cost to providers of EVV compliance will require a rate of reimbursement enhancement through the Office of Rate Review, and will therefore, increase the overall Medicaid costs for the State of Alaska.

Examples of fiscal "costs" requiring Medicaid rate enhancement are:

1. Training for a new data system
2. Who pays the providers for that additional training time that is not billable?
3. Must each employee have his/her own portable electronic device or telephone? If so, will the State of Alaska reimburse a portion of their bill? Who pays if they don't already have one?
4. Who purchases the new system and at what cost?
5. Administrative time required to reconcile differences between dual systems.
6. If SDS receives notification of missed visits in real time how are they to respond? Additionally administrative time would be required of providers to respond to SDS research.
7. If a visit is missed and SDS responds with the direct service worker are they a joint employer?

8. Would every individual direct support provider have to be enrolled with Medicaid with their own provider number? If so, additional provider enrollment costs and administrative time incurred by agency based providers.

The Association recommends that the requirement for "home and community based services" be removed from the bill, and a pilot project limited to consumer-directed services, such as PCA or chore services.

Sincerely,



Lizette Stiehr  
Executive Director, AADD

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