

**Department of Social Services
Home and Community Based Services Unit
55 Farmington Avenue
Hartford, CT 06105
Attention: Kathy Bruni, Director**

**ABI and ABI II Waiver Amendment
Julie Peters, Executive Director
Brain Injury Alliance of Connecticut**

Response to Notice of Intent to Amend the Acquired Brain Injury Waivers.

Brain Injury Alliance of CT would like to take the opportunity to provide feedback in regard to the DSS proposal to amend both ABI Waiver I and Waiver II for the purpose of changing the case management service currently provided by department social workers to independent, contracted entities.

BIAC is in support of the amendment as written. We do not believe that the current system of providing CM services within the Department under the domain of the DSS social worker is most beneficial to the waiver participant nor is it effective. Due to lack of ability to adequately respond secondary to split roles and competing priorities and lack of accountability, department social workers are unable to effectively regularly review, monitor and oversee the service plan.

The CM plays a pivotal role in the person centered process. It is essential that the CM has the ability to fully commit his/her time and attention necessary for full oversight of the plan. This all equates to optimizing individual's overall positive outcomes, satisfaction levels and health/safety within the community.

It is also BIAC's understanding that waiver participants will have increased access to case managers via the required 24/7 on call system inclusive within this proposed model of service. This is essential for health/safety and quality assurance standards.

We had previously provided feedback and support the changes in language. We support the language that includes requiring brain injury training and experience for the designated CM staff, not solely experience in case management by the agency providing the case management. We support the added language to require that, in addition to a mandatory comprehensive one-day initial training, case managers will also be required to complete at least two additional brain injury specific trainings throughout the course of the first year of contracted services. In addition, as BIAC requested, this amendment includes language to widen the potential case management applicant pool to include those with masters in social worker, rehabilitation counseling, counseling, or human services.

Most importantly, we support the proposed change for CM because satisfaction survey results specific to the Danbury Pilot Project indicated that 93% of the participants surveyed indicated overall satisfaction with operations as excellent or good. In a truly person-centered process, participant satisfaction must be of utmost importance.

In a perfect world, with appropriate funding, DSS social workers would have the time, experience and the resources to effectively provide care management to all individuals under the ABI Waiver program. However, recognizing the extreme limits on the DSS budget, BIAC believes that contracting case management services, including appropriate evaluation and assessment of those services, will better serve those under the Waiver.

I would like to recognize the efforts of the Department in seeking a solution that will better serve these individuals.