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Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS-2296-P
P.O. Box 8016
Baltimore, MD 21244-1850

To Whom It May Concern:

The Idaho Council on Developmental Disabilities commends the Centers for Medicare and Medicaid for the proposed rules changes in CMS-2296-P. These rules appear to strengthen HCBS by providing greater specificity and guidance about what is and is not a home and what constitutes true community integration and participation.

The National Association of Councils on Developmental Disabilities (NACDD) has submitted comprehensive comment on these rules from the perspective of state councils. Our Council is in full agreement with those comments. In particular, we would like to emphasize three points:

- The value and importance of setting out standards for community living that address not only the physical facility in which a person lives but the ability of an individual to exercise choice and control in their lives, and the recognition that the use of waiver services is intended to support those community living arrangements not congregate settings that exist in the community.
- It is critically important that any combination of waivers not minimize or diminish the needs of people with developmental disabilities when compared to other disabilities nor allow the reduction in individual budgets that might occur; please keep cost comparisons separate.
- Requiring that a state's Medicaid program seek input from consumers, including DD Councils, when changes are sought in programs that serve people with developmental disabilities will ensure that the consumer's voice is integral to the process.

Thank you for your efforts on behalf of people with developmental disabilities and their families. We look forward to the system improvements that we feel will be the result of these rules.

Sincerely,

Marilyn B. Sword

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Executive Director

cc: Michael Brogioli, NACDD