

Mountain Valley's Position on Implementation Timelines for the CMS Rule

Mountain Valley has joined with 17 of Colorado's CCB's in an attempt to obtain additional time from the Centers for Medicare and Medicaid for the implementation of new Case Management systems within Colorado. The reason for this is that we truly fear that the impact on the people that we serve and their families from a premature massive change could be devastating. We have served almost 4,000 individuals or families over the past 30 years with only two complaints that were not resolved locally. We believe that one of the reasons that organized advocacy has never succeeded in our region is due to the fact that we, as the CCB, have been able to work with families in a mutually respectful manner to not only solve any disagreement but more importantly prevent problems from occurring. We do not deny that there may be isolated issues in some parts of the state, but truly resent efforts by Front Range activists, who have no knowledge of the reality of services within the mountain communities, to generalize these as universal throughout the state.

While we do not oppose change and feel that some TCM issues such as eligibility, resource allocation, RFP's, etc. can and should be moved to another entity as soon as possible, we do not trust that the more critical person centered functions can be moved from the CCB without considerable up front research and planning. Frankly, we have little trust in the State's ability to implement some new system without harming persons served and their families. It would be worthwhile to consider the disastrous roll out of the transfer of dental services from the CCB's to DentaQuest, as an example of why we all should be concerned. We have no confidence that this even more important transition could be accomplished without similar or greater problems.

We empower our case managers to see advocacy for the needs of the individuals that they serve as their number one priority. Since there is no organized advocacy in our area, without our case managers these individuals and their families would have no one to look out for their needs and interests. There has never been a complaint regarding this nonsensical perception of "conflict of interest" because in reality our case managers have never and will never act in a conflicted manner.

It is true that we have developed an array of services during our 40 year existence. While all services for children are provided in community inclusive settings by independent providers, we continue to be the provider for most of the services for adults. However, the reason that we have invested millions of dollars to develop this capacity is simply that had we not they would not exist. At the present only three Program Approved Service Agencies have come forward and currently serve a total three individuals in our area. The fact

is that Mountain Valley's service area is the most expensive in the State and as a result the PASAs, particularly the for-profits, have no desire to meet needs within our area because they cannot make money doing so.

Independent surveys consistently show a very high level of satisfaction with the Case Management services provided by Mountain Valley and other CCB's. Families from our area continue to passionately advocate against the destruction of the system that has worked so well for them. There may be no better example of the real value of our case management system than a statement given by one of Mountain Valley's case managers at a public hearing regarding this issue:

"I held the hand of one of the individuals that we serve as she passed away ... there was nobody else who would or could do it".

This powerfully exemplifies the fact that our case managers see each individual as valued and the extent to which they will go to help them. It is but one example of the genuine commitment of our system to meeting the needs of the people that we serve. We have seen nothing in the various replacement models that would provide for this kind of real commitment to their needs. However, when those who are advocating for the destruction of our system can provide assurance that new alternative systems will provide this level of personal commitment, we will be the first to support it.

We acknowledge the fact that any system can be improved. However, we will continue to work to assure that the strengths of our current system are perpetuated in any new model. This is a very complex task and any "quick fix" to meet Federal requirements could very well cause harm to the individuals and families that we serve. Therefore, Mountain Valley supports a reasonable extension in the implementation timeline.