



Virginia Network of Private Providers, Inc.

Building Meaningful Lives for Extraordinary People

<http://vnppinc.org>

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An association for persons or organizations with an interest in or that provide support for persons who have mental illness, developmental delay or substance use disorder, and who are licensed by or funded by the Department of Behavioral Health and Developmental Services.

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Thank you for the opportunity to comment on the work of the Transformation Team Recommendations; we appreciate the tremendous effort that has gone into the development and the vetting of the recommendations.

We offer the following comments for your consideration:

- Providers, both public and private, will continue to be the essential catalyst to drive the changes proposed and they need to do so from a position of strength and secure/adequate funding, supported and valued by the Executive Branch agencies and full participants in all aspects of this transformation.
- Strengthening the provider workforce, implementing best practices, requiring organizational self-assessments, establishing quality standards for each core BH service and simplifying documentation are, among other items listed, all good goals. The provider community has the capacity and commitment to implement these as long as there is adequate funding.
- We, as providers and advocates, are concerned that the effort to “transform” will over-shadow the very basic elements of providing adequate support for the system already in place. While access to services is partly a function of identifying the “right services for the right person at the right time” it is equally a function of supporting the services both with funds and with policies/regulations that facilitate rather than hamper.
- The emphasis on the provision of Case Management is understandable, but it is fair to say that current requirements, especially for I/DD Case Managers, have rendered them ineffective in doing most of the tasks listed. They have become, instead, sub-regulatory monitors, collectors of data, and movers of paper!
- We are concerned about the lack of specific recommendations to reduce the waitlist for Waiver services. As the wait list increases, more individuals and families experience urgent crises and our system needs supports to assist them. Additionally, we are concerned that the transformation relies heavily on Medicaid funding which does not address those individuals who are ineligible for Medicaid funding. We recommend a commitment to also support these individuals.
- We are concerned, as is evident in the comments above, that it will be difficult to sequence the various recommendations to coincide with funding requested from and approved by the General Assembly while also managing the ongoing need for funding for expanded BH crisis capacity, reducing the ID/DD Waitlists, funding the revised rate structure for I/DD services, etc. It is our grave concern that mandates and/or expectations for transformation will be imposed without the support and funding being in place.

Again, thank you for the opportunity to comment.

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