

*Originally submitted as email to Anastasia Dodson, Associate Director for Policy, DHCS*

January 23, 2015 – Ed Roberts Day

Dear Ms. Anastasia Dodson,

The IHSS Consumer Union came out very strongly last year against the ballot initiative requiring 75 hours of mandatory training. Enclosed find our petition statement written by the late John Wilkins, webmaster of the IHSS coalition and arguably one of the most respected IHSS activist California has known.

With that petition you will see 35 pages of remarks of IHSS consumers and providers who will be directly impacted if such a ballot initiative is introduced by any such burdensome, ill-conceived policy is put together without a clear understanding of the destructive potential it could have for the IHSS provider pool. We feel mandatory training undermines the in-home supportive services program which is Consumer Directed cornerstone of the Disability Rights Movement and actually implements the true spirit of the Olmsted Supreme Court decision. The beauty and simplicity of the IHSS independent provider mode has permitted it to be the beloved program that it is and has been for over 40 years.

A similar program to this proposed was implemented in Washington state several years ago and has greatly diminish the provider pool and caused discontinuity of care for IHSS consumers according to the state auditors office. Here's a statement from the auditor's office in Washington state "Many applicants dropped out of the program and of those who became certified only 59% were certified on time."Despite the extension of certification deadline in 2013 many applicants did not complete the process and did not obtain a home care aide certificate. Of those applicants who completed the process 59% obtain their certificates within the specified timeframe. Program managers told us they believe the failure of workers to complete the certification is resulted in higher turnover rate which can affect continuity of care for clients."

Attached please find, in addition to John Wilkins is statement, our 35 pages of comments by the people will be directly impacted by such a potentially destructive policy that will create the largest barrier of all the finding and retaining providers, as it did in Washington state please find likewise authoritative statements By Richard Daggett, President of the Polio Survivors Association, and an excellent position paper by Senior and Disability Action SDA about last year's attempt to put 75 hours of mandatory training on the ballot. We have seen and align ourselves with the excellent letters we know you have received from the Coalition of Public Authorities, the California IHSS Consumers Alliance CICA and Educate Advocate organization for parents of Developmentally Disabled.

I'm sure you will see a chorus of unanimity that a policy like this could be a final blow to the Independent Provider Mode Of Consumer Directed In-Home Supportive Services. One Executive Director of an independent living center put it this way: " this will put people back into nursing homes. People get into this work often for helping family members, friends, or people they know. If you make it this hard for people, they simply can't afford to help anymore and this will drastically shrink the provider pool."

IHSS is a jewel of public policy, when it is permitted to operate simply and elegantly as it has for decades. It is the closest possible representation of an implementation of the spirit of the Olmsted Supreme Court decision and the Disability Civil Rights Movement.

Additionally, attached is the responses from our community to the Anna Gorman piece on her surmised solution to abuse in the home of IHSS consumers being mandatory training of IHSS workers. She mentions in her piece that: "SEIU-United Healthcare Workers West proposed a statewide initiative last year that would have required 75 hours of training, but the union didn't get enough signatures to put the measure on the ballot. SEIU plans to try again for the 2016 ballot."We strongly feel that if the medi cal waiver application includes providing medi cal dollars for "optional" training costs of IHSS workers this will indeed lay the groundwork for SEIU in their proposal for the ballot in California in 2016 to have a funding source of medi cal dollars for mandatory training of IHSS workers.

We are very concerned that we were never asked to weigh in on this process. We are doing so now and forgive us if it is quickly put together because unfortunately our self-

determination is routinely violated by fast moves where we, the true experts on the program, are given little or no opportunity to weigh in. For all the reasons mentioned above, we urge you to remove from your application for medical waiver application the portion on training for IHSS workers.

Thank you for your time.

Nancy Becker Kennedy, Susan Kirk Chandler, Lillibeth Navarro, and Kristie Sepulveda-Burchitt On Behalf Of the IHSS Consumers Union