



Alliance for the Betterment of  
Citizens with Disabilities

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## Empowering People: Providers Shaping Policies

New Jersey Division of Medical Assistance and Health Services  
New Jersey 1115 Comprehensive Medicaid Waiver Demonstration

Post-Award Public Session  
July 17, 2025

On behalf of ABCD, thank you Commissioner Adelman, Deputy Commissioner McGuire, Assistant Commissioners Woods and Seifried and DHS staff for all your efforts to prevent the reduction of federal Medicaid funds.

Thank you for the opportunity to provide comments on N.J.'s 1115 Comprehensive Waiver Demonstration.

### Remote Supports. Technological and Moral Progress

Remote Supports (RS) are a means by which to deliver Division of Developmental Disabilities Waiver services to maximize the level of self-dependence chosen by and appropriate for the individual.

The use of RS will enable individuals to live independently in the community, work in competitive integrated environments, participate in inclusive community activities, improve their quality of life, and increase their safety, health, and privacy. In addition, considering the current workforce shortage, RS will help minimize passive staffing when appropriate and safe.

Currently, the Centers for Medicare and Medicaid Services is prioritizing the acceleration of technology to help make smarter clinical decisions and to supplement (and not replace) what clinicians do. We fully support any efforts by the Administration to ensure that RS becomes a Waiver service.

### Policies which Disproportionately Disadvantage Subgroups of the I/DD Population

- Individuals with multiple physical, neurological, and developmental disabilities

"I couldn't get out of the house and come to program to see my friends, play my music, and get my therapy, if the wheelchair van didn't pick me up every day."

“My daughter has a catheter and ostomy bag and needs a nurse otherwise she couldn’t attend her day program; I’d have to leave my job and the both of us would be at home all day.”

“I practice my swallowing every day with my (speech) therapist, so I won’t need a feeding tube so that I can continue to eat foods I like and have meals with my friends at my home.”

Yet, the current policies regarding transportation to and from day habilitation, nursing, and physical, occupational and speech habilitative therapies disproportionately disadvantage them and others who have multiple physical, neurological, and developmental disabilities. How so? Reimbursement rates for what constitutes basic services for this subgroup to continue to live in the community and participate in day programs are so low or nonexistent that if not for the Herculean efforts of agencies that are mission driven, i.e. hell bent on adequately serving the individuals for whom they have made a moral commitment, these services would be relatively unavailable.

- Individuals with co-occurring I/DD and mental health conditions

I am baffled by a department that noted “too many systems of care for people with IDD continue to focus on controlling and managing challenging behavior without adequate consideration of the potential for underlying mental health or medical conditions as the causes of the behavior”<sup>1</sup> is the same department that refuses to consider including in the Waiver diversified behavioral health care services for this subgroup which is made up of heterogeneous individuals.

ABCD was formed with the express purpose of advocating for individuals with I/DD who have complex needs. There is no better friend to our population than the people who serve in the DHS and DDD. We must promote access to opportunity and equality in services delivery regardless of an individual’s level of complexity. For these two subgroups, these aforementioned services must be deemed basic; fundamental to their ability to thrive in the community and, therefore, adequately resourced to be truly available.

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<sup>1</sup> DHS Response to OLS Questions, p.42 [https://pub.njleg.state.nj.us/publications/budget/governors-budget/2024/DHS\\_response\\_2024.pdf](https://pub.njleg.state.nj.us/publications/budget/governors-budget/2024/DHS_response_2024.pdf)