



**CONSORTIUM FOR CITIZENS
WITH DISABILITIES**

June 19, 2018

Chair Greg Walden
2185 Rayburn House Office Building
Washington, DC 20515

Ranking Member Frank Pallone
237 Cannon House Office Building
Washington, DC 20515

Dear Chair Walden and Ranking Member Pallone:

The undersigned members of the Consortium for Citizens (CCD) are writing to express our support for passing a delay in the implementation of Electronic Visit Verification (EVV) under suspension. Both H.R. 6042 and H.R. 5912 include implementation delays and increased stakeholder engagement which we strongly support.

CCD is a coalition of national organizations working together to advocate for federal public policy that ensures the self-determination, independence, empowerment, integration, and inclusion of the approximately 57 million children and adults with disabilities in all aspects of society.

Designing and implementing an effective and thoughtful EVV program takes careful planning. States must design the EVV system, make changes to Medicaid documents and protocols, seek funding from their legislatures, purchase technology, engage stakeholders (as required by the statute), and educate and train consumers in using the EVV system, among other necessary steps to put a system in place.

Even with the recently released subregulatory guidance on May 16, 2018, there is still a lack of clarity on a number of basic requirements of the EVV program less than eight months before the implementation deadline. A significant delay in implementation is needed to ensure that the privacy and civil rights of consumers are protected; that the administrative and financial burdens on service providers is neither onerous nor duplicative; and that states can design and implement their EVV programs in a thoughtful, deliberative manner with robust stakeholder input. At this point, states simply do not have enough time before January 1, 2019 to implement effectively their EVV systems, particularly in light of the fact that many states have already missed their legislative cycles to seek funding for the upcoming budget year.

Due to the time needed for states to appropriately design programs that meet the requirements and also respect the privacy rights of individuals being served, the undersigned members of CCD strongly support including an EVV implementation delay in the larger opioid package of bills. We thank Rep. Guthrie, Rep. Langevin, Rep. DeGette, Rep. Stivers, and Rep. Young for their leadership on this important issue. We look forward to working with you to secure its passage.

For questions or to discuss further, please contact Sarah Meek, Co-Chair of the Long-Term Services and Supports Task Force, at smeek@ancor.org.

Sincerely,

ACCSES

Allies for Independence

American Association of People with Disabilities

American Association on Health and Disability

American Civil Liberties Union

American Network of Community Options & Resources (ANCOR)

Association of Assistive Technology Act Programs

Association of University Centers on Disability

Autism Society

Autism Speaks

Autistic Self Advocacy Network

Bazelon Center for Mental Health Law

Brain Injury Association of America

Center for Public Representation

Disability Rights Education and Defense Fund (DREDF)

Easterseals

Epilepsy Foundation

Justice in Aging

Lutheran Services in America – Disability Network

National Academy of Elder Law Attorneys

National Association of Councils on Developmental Disabilities

National Association of State Directors of Developmental Disabilities Services

National Association of State Head Injury Administrators

National Council on Aging

National Council on Independent Living (NCIL)

National Disability Institute

National Disability Rights Network

National Down Syndrome Congress

National Health Law Program
National Multiple Sclerosis Society
TASH
The Arc of the United States
United Spinal Association

Cc: Speaker Ryan
Minority Leader Pelosi
Rep. Guthrie
Rep. Langevin
Rep. DeGette
Rep. Stivers
Rep. Young