



*Connecticut's Partner in Brain Injury Prevention & Recovery for More Than 30 Years*

**October 22, 2014**

**Appropriations & Human Services Committees Public Hearing  
1915(C) HOME AND COMMUNITY-BASED SERVICES WAIVER, CT ACQUIRED  
BRAIN INJURY WAIVER I AMENDMENT**

**Julie Peters, Executive Director**

**Brain Injury Alliance of Connecticut**

The Brain Injury Alliance of Connecticut supports the implementation of the Transition Plan to achieve compliance with the CMS Final Rule for Home and Community Based Services (HCBS) for provider owned or controlled settings. BIAC is in complete support of allowing Waiver participants to live fully with access to community based settings as distinguished from institutional settings. We applaud CMS' desire and intent to move towards outcome-oriented services defined by their nature and quality as evaluated by the very participants who are the recipients.

I would like to comment on the amendment within the Cognitive Behavioral section of the Waiver that services are 'in person, face to face'. Cognitive behaviorists should be reimbursed for strategy and planning, education of staff and family, situations where immediate intervention is needed and for when it is not possible to meet face to face. However, these situations should **never** replace in-person meetings with the participant. We suggest further language be added defining face to face in the context of new technology. The definition should be expanded with explicit language regarding the use of other information technology mediums.

We support the face to face amendment with the inclusion of language to be able to address these situations.