



big lakes developmental center, inc.

## **Community Developmental Disability Organization**

for Riley, Geary, Clay and Pottawatomie counties of Kansas

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To: Representative Francis Averkamp, Chair  
House Committee on Welfare Reform

From: Melisa Reeder, Director of Big Lakes CDDO Administration

Date: 2/6/2025

RE: Concerns Regarding Proposed System Changes

My name is Melisa Reeder, and I am the Director of Big Lakes CDDO Administration. Big Lakes CDDO has operated out of Big Lakes Developmental Center as the county-designated Community Developmental Disability Organization (CDDO) for Riley, Geary, Pottawatomie, and Clay counties since the passage of the Developmental Disabilities (DD) Reform Act. This legislation created the framework for CDDOs.

CDDOs play a critical role in coordinating services and supports for individuals with intellectual and developmental disabilities (I/DD). As the single point of entry for accessing Home and Community-Based Services (HCBS) waiver funds, CDDOs are responsible for determining initial and annual eligibility for individuals to begin or continue receiving waiver services. Importantly, CDDOs are neutral entities—we do not provide services or issue payments for them. Our role is strictly to determine eligibility impartially.

KDADS is proposing multiple system changes. There are a few that directly impact the CDDO. One is the current assessment tool, known as BASIS. The BASIS is outdated and deficit-based. It does not accurately reflect the level of support individuals need to live their most independent lives. Once entered into the KDADS system, the BASIS generates a tier score, which informs the CDDO of an individual's eligibility and determines the reimbursement rate paid to providers by Managed Care Organizations (MCOs). KDADS has proposed replacing the BASIS with the Medicaid Functional Eligibility Instrument (MFEI), a much more comprehensive and accurate tool for assessing individual support needs. However, KDADS has also indicated that under the MFEI system, MCOs will generate tier scores, effectively removing CDDOs from the eligibility determination process. This shift would create a conflict of interest by placing eligibility decisions in the hands of the same entities responsible for funding services.

The BASIS assessment questionnaire consists of three pages, while the MFEI expands the questionnaire to twenty-eight pages. Implementing the MFEI will require upgrades to CDDO software and hardware, along with extensive training for CDDO staff, targeted case managers, providers, parents, and guardians. The MFEI is expected to take approximately two hours to complete, compared to less than an hour for the BASIS. This shift will substantially increase the workload for my team, effectively doubling the time needed for assessments due to the MFEI's length and extensive documentation requirements. KDADS

has NOT proposed an increase in assessment reimbursement fees to pay for the increased costs CDDOs will incur.

Unfortunately, KDADS' communication and training efforts regarding the MFEI have been insufficient, with sessions frequently delayed or canceled. For example, the MFEI's original go-live date of January 1, 2025, has been postponed multiple times, with the current projected launch now set for July 1, 2025. However, further delays seem likely. These ongoing challenges will place additional strain on support staff and create significant time pressures for our small CDDO department as we work to meet MFEI deadlines.

Beyond implementing a new assessment tool, KDADS is also calling for CDDOs to be physically separate from community support providers as a solution to an erroneous assumption that there is a widespread conflict of interest problem at CDDOs across the state. It is worth noting that CDDOs and providers already operate under separate policies and procedures, and CDDOs undergo regular peer reviews to identify and address any potential conflicts of interest. This process has been in place since Big Lakes CDDO was established, and there have been no formal complaints regarding conflicts between Big Lakes Developmental Center as a service provider and Big Lakes CDDO as a coordinating entity for many years.

While CDDOs and providers are open to changes within the system, we are concerned about the accelerated timeline for implementation. This urgency seems to be driven by KDADS' need to meet compliance requirements set by the Centers for Medicare & Medicaid Services (CMS). CDDOs are committed to working collaboratively with KDADS to improve the CDDO system; however, we strongly urge KDADS to avoid rushing the implementation process to ensure the successful rollout of this much-needed new assessment tool.

Sincerely,



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