



big lakes developmental center, inc.

Community Developmental Disability Organization

for Riley, Geary, Clay and Pottawatomie counties of Kansas
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To: Senator Renee Erickson, Chair
Members of Senate Committee on Government Efficiency

From: Melisa Reeder, Director of Big Lakes CDDO Administration

Date: 03/06/2025

RE: HB2240

My name is Melisa Reeder, and I serve as the Director of Big Lakes CDDO Administration. Since the passage of the Developmental Disabilities (DD) Reform Act, 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. This legislation established the framework for CDDOs, which plays a vital role in coordinating services and supports for individuals with intellectual and developmental disabilities (I/DD).

As the single point of entry for Home and Community-Based Services (HCBS) waiver funds, CDDOs determine initial and annual eligibility for individuals seeking or continuing waiver services. Importantly, CDDOs operate as neutral entities—we do not provide services or issue payments. Our sole responsibility is to assess eligibility impartially.

In response to concerns from stakeholders, families, and professionals, KDADS is proposing several system changes and has launched a new workgroup process. Over the past two months, KDADS has established a main workgroup along with three sub-workgroups focused on Conflict of Interest, the Assessment Tool and Funding, and the Unbundling of Day Services. I have joined the Assessment Tool and Funding Committee, which is working on the development and implementation of a new assessment tool.

These proposed changes introduce significant, system-wide adjustments, many of which may take effect within a short timeframe. Several directly impact CDDOs, particularly the transition from the current BASIS assessment tool to the Medicaid Functional Eligibility Instrument (MFEI).

The BASIS tool is outdated and deficit-based, failing to accurately reflect the level of support individuals need to live independently. Currently, once an assessment is entered into the KDADS system, BASIS generates a tier score that informs CDDOs of an individual's eligibility and determines the reimbursement rate paid to providers by Managed Care Organizations (MCOs). KDADS has proposed replacing BASIS with the MFEI, a more comprehensive and accurate tool for assessing individual support needs. However, under the MFEI system, MCOs—not CDDOs—will be responsible for generating tier scores, effectively removing CDDOs from the eligibility determination process. This shift raises concerns about a conflict of interest, as the same entities responsible for funding services will also determine eligibility.

Another major change involves the MFEI's increased complexity. While the BASIS assessment consists of three pages, the MFEI expands to twenty-eight pages. Completing an MFEI assessment is expected to take approximately two hours, doubling the time required for BASIS. This will significantly increase the workload for CDDO staff, who must also navigate software and hardware upgrades, as well as extensive training for case managers, providers,

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parents, and guardians. Despite these increased demands, KDADS has not proposed an increase in assessment reimbursement fees to cover the additional costs CDDOs will incur.

While we appreciate the establishment of workgroups, KDADS' communication and training efforts regarding MFEI implementation have been inadequate, with frequent delays and cancellations. Originally set to launch on January 1, 2025, the MFEI rollout has been postponed multiple times, with the current target date of July 1, 2025. However, further delays seem likely. These ongoing challenges place additional strain on CDDO staff, who are already facing tight deadlines.

Beyond the MFEI transition, KDADS is also pushing for CDDOs to be physically separate from community support providers, based on an inaccurate assumption that widespread conflicts of interest exist across the state. However, CDDOs and providers already operate under distinct policies and procedures and undergo regular peer reviews to identify and address any potential conflicts. Since its establishment, Big Lakes CDDO has had no formal complaints regarding conflicts of interest with Big Lakes Developmental Center as a service provider.

While CDDOs and providers support necessary system improvements, we are concerned about the accelerated implementation timeline, which seems driven by KDADS's need to meet compliance requirements set by the Centers for Medicare & Medicaid Services (CMS). To establish the Community Support Waiver, KDADS must first ensure compliance across all other waivers. We remain committed to working collaboratively with KDADS to strengthen the CDDO system, but we strongly advocate for a thoughtful, well-planned rollout to ensure the successful implementation of the new assessment tool and other system changes.

Legislative oversight remains essential to ensure that community voices are heard and that practical solutions are considered and implemented. I ask for your support of HB2240.

Sincerely,

A handwritten signature in blue ink, appearing to read "mreeder", is positioned below the "Sincerely," text.

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