



Survival Coalition

of Wisconsin Disability Organizations

P.O. Box 7222, Madison, Wisconsin 53707

March 18, 2021

Dear EVV Team:

Thank you in advance for the opportunity to provide feedback to the DHS Proposed Plan for EVV Hard Launch. The proposed date of September 1, 2021, is concerning to Survival Coalition, because the DHS-provided EVV system and resources are not yet operating at full capacity during the soft launch experience.

Specific areas of concern based on Survival members' experiences are:

State contractor Sandata supports to external stakeholders have been inconsistent and inadequate to provide resolution to users experiencing issues. Examples of those issues include:

- Help Desk tickets remain open for more than 4 weeks and require ongoing prompting to get attention or resolution
- Call Center Help Desk has not been a reliable resource and users have decreased use due to lost confidence in accuracy of information or timely follow up.
- Inaccurate or unavailable data in the system (Client ID numbers not viewable, client contact information not accurate)
- Client contact information is inaccurate and providers are not able to update efficiently.
- Problems have led to delays in agencies implementing their system and preparing for hard launch. This lack of compliance should not be perceived as providers or individuals not committed to participate or non-compliance.

Plan does not include any language that outlines how DHS will ensure due process is provided to individual using services, or reflecting steps DHS will take to support individuals and providers to rectify alleged EVV non-compliance.

- Current plan indicates risk of disenrollment, forced choice to change providers or LTC programs, and does not outline appeal process steps for the individual user
- Hard launch plans need to ensure adequate person-centered

processes and supports for any non-compliance resolution

- Processes and expectations should be consistent across Medicaid funded programs
- Outreach and education opportunities should be provided prior to hard launch to ensure users of the system have a clear understanding of expectations and consequences for non-compliance.

The hard launch plan should be based on data set that reflects the actual individual, agency or worker system experience to ensure service continuity for individuals

- Current measure for a fully functioning Wisconsin EVV system is based on DHS measures that don't address and fully rectify concerns from the external stakeholder experience.
- People using services should have adequate time and supports to make an informed choice about changes to their service providers and program options prior to hard launch.

Thank you for this opportunity to outline our concerns. Several of our members sit on the EVV Stakeholder Committee and can follow up in person with more specifics if that would be useful.

Survival Coalition is comprised of more than 30 statewide disability organizations that advocate and support policies and practices that lead to the full inclusion, participation, and contribution of people living with disability.

Sincerely,

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