

**State Consumer and Family Advisory Committee (SCFAC)  
C/O Community Engagement and Empowerment Team**

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Benita Purcell  
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June 28, 2019

Kody H. Kinsley  
Deputy Secretary for Behavioral Health and  
Intellectual and Developmental Disabilities  
3001 Mail Service Center  
Raleigh, North Carolina 27699-3001

Dear Kody:

This submission is the response of the North Carolina Consumer and Family Advisory Committee (SCFAC) to the Concept Paper “North Carolina’s Care Management Strategy of Behavior Health and Intellectual/Developmental Disability Tailored Plans” dated May 29, 2019.

First, SCFAC recognizes and appreciates the willingness expressed by many NCDHHS personnel to include the thoughts and concerns of consumers and family statewide as this important transformation unfolds in North Carolina, both within the NC General Assembly and as designed and implemented by NCDHHS. Outreach to consumers and to advocacy and advisory groups, as well as the availability of DHHS staff to inform and address concerns, has been extremely beneficial and most appreciated.

Second, although SCFAC recognizes the many benefits that individuals in North Carolina have the potential to receive with the overall design and the implementation of the proposed Care Management Design for Tailored Plans, there are several areas that SCFAC recommends be considered.

Immediate Issues Affecting Beneficiaries

- Most importantly, will the proposed Care Management Design for Tailored Plans be adequately communicated to all consumers and families who are currently receiving, or who are eligible to receive services covered by the proposed Tailored Plans? In order that they can make decisions best suited for their futures, individuals must be given adequate and accurate information about the services they need and how they will be provided those services.
- Will local support agencies, such as county DSS and their corresponding health departments, be given adequate training to provide meaningful information to beneficiaries with concerns/questions about how they will continue to receive services until the Tailored Plans are implemented in 2021?
- Although the great majority of the Care Management Design appears conceptually sound, will there be enough oversight to make certain that it all happens as planned, particularly as the 3 proposed Care Management Organizational Structures are chosen and implemented as the Tailored Plans are rolled out in 2021? Consumers and their families must know, as far in advance as possible, whom they will be working with in the management of their care and the responsible individual they can contact directly with any questions or concerns.

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- The move to Integrated Care for many individuals with complex medical, behavioral, and/or IDD needs may difficult to effectively understand, especially after most have a familiarity with a system of differentiated providers and case management. Direct one-on-one contact with consumers and families will be critical to the success of the transformation process.

Finally, although this Concept Paper specifically addresses the implementation process for Care Management in Tailored Plans over the next 2 years, we continue to keep in mind broader, long-term issues that will significantly impact individuals receiving services in both Standard and Tailored Plans:

- Will funding continue for current and future individuals who will require supports within the both Standard and Tailored Plans?
- What provisions will be made to adequately provide services to individuals in rural areas with low population density and relatively higher percentages of poorer citizens as this “access-disparity” becomes increasingly acute?
- How will all agencies and organizations involved in providing effective services address the issue of adequate compensation for Direct Service Personnel so that all beneficiaries can receive the supports they need?

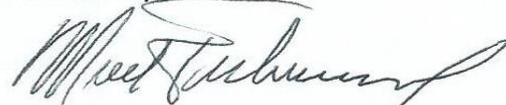
SCFAC fully understands that many of these issues may not be able to be addressed at this time and require detailed analysis as further design and implementation of the new managed care structure proceeds. We certainly desire that the plan of integrated care together with quality care management be successful and ultimately benefits those in need of system supports. SCFAC members, together with their statewide individual and organizational partners welcome the opportunity to work with NCDHHS as the plan proceeds.

Sincerely,



Benita Purcell, Chairman  
State Consumer & Family Advsoy Committee

Sincerely,



Mark Fuhrmann, Vice-Chairman  
State Consumer & Family Advisory Committee