

To Whom It May Concern,

I would like to bring to your attention a very unnecessary and onerous burden being placed on many Texas families with disabilities who are receiving community based attendant services. This fall HHSC is implementing the federal requirement to document attendant services via a program called Electronic Visit Verification (EVV). The stated goal is to ensure compliance and limit fraud. But the families who live with the disabled client are being caught up in a one size fits all program. This program was obviously developed for professional attendants, but for live-in family attendants it creates an administrative nightmare. While the goals of this program is admirable, I will demonstrate it does nothing to ensure services are provided or prevent fraud, with live-in family attendants, and only serves to drastically decrease the quality of life for both the disabled client and live-in family attendant.

As much as I appreciate the stipend my family receives under this program, we need to be real. As a family, we spend much more time, than the allotted 24 hours per week caring for our son. So it goes without saying the state is getting more than their monies worth, from these live in family attendants. When speaking with Alamo Consumer Direct (my son's services provider) they told me the system is also to combat fraud and there are family members getting paid, but do not provide the services. As much as it saddens me to hear it, I'm sure it is true and that is completely unacceptable. But this EVV system does nothing to curb or check that particular problem, within this demographic. This system uses your phone's GPS to track and log the attendant's activities to ensure the attendant was at the client's home as scheduled and uses the data to help verify the services are being provided. If the attendant is a live-in family member this serves no purpose. The attendant's GPS will always show they are at the clients address (because they live there also) and they can simply process fictitious visits and not provide any services. The only thing that will combat this sort of fraud are in home visits, with the client, to assess their condition and try and determine if services are being provided.

One of the few precious luxuries a disabled person has it to live with a loving family who will look out for them and to live as normal a life as possible. This program forces these families into a regimented and scheduled life style that is anything but normal. Can you imagine either being tethered to a cell phone all day and night and having to clock in and out each time your child brushes their teeth, gets dressed, uses the bathroom, combs their hair, or you make them a sandwich. Well that is exactly what this program does. The only other option is to schedule all services into a single time period each day. How does this overly regimented process provide for a normal life? Are we supposed to cram all daily activities in a single 2.5 hours period? As an example here is a list of some of the services he receives:

- Bathing
- Toileting
- Shopping
- Dressing
- Cleaning
- Exercising
- Laundry
- Grooming

- Meal Prep
- R/T Hair/Skin
- Medication Assistance

Can you imagine trying to condense these services into a single period each day? If a client doesn't have a family to care for them, then they must use a professional attendant, who will go for a specific time frame each day. But why force everyone into this regimented lifestyle? Under the current system we could go about having as normal of a life as possible and either log the hours at the end of the day or week. But now we are being forced to document these attendant services in real time. I fully understand the need to jump through a few extra hoops when it comes to receiving state/federal assistance, but this is making families across Texas jump through ineffective onerous hoops every day, for the rest of our lives.

If the EVV system actually helped prevent live-in family attendants from committing fraud, then it might make a little sense. But since it doesn't I am forced to ask why would our government place such an unnecessary burden on families already under the stress of caring for a disabled family member? Should families in our situation be scrutinized and monitored to ensure services are rendered? Of Course, but in a way that actually does something and not just give the impression. For this particular demographic this program is nothing but Fraud Prevention Theater and does nothing to ensure proper care or fraud prevention. If a live-in family attendant was inclined to commit fraud, it would be just as easy with this program as the old one. It just makes it a lot harder on those trying to provide the disabled family member a more normal quality of life.

In closing, I ask you to please bring a little common sense to this program and push to exempt these families from this completely unnecessary program, allowing Texans with disabilities to live as normal as a life as possible. Otherwise many families will be forced to choose between monetary assistance and a normal life. This is not a decision we should have to make.

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Father

