

SUMMARY OF PUBLIC COMMENTS

1915(c) Medicaid Waiver for Individuals with Intellectual and Developmental Disabilities (I/DD Waiver)

Amendment #12

This document contains a summary of the public comments collected in response to the 1915(c) Intellectual and Developmental Disabilities (I/DD) Waiver Amendment #12. This amendment will implement a rate increase for specific waiver services based on the provider rate study conducted in 2024 with revisions to include the increase to minimum wages in 2026. The rate study proposed rate increases for the following services: Personal Assistance/Habilitation, Residential Habilitation, Additional Residential Supports, Adult Day Health, Community Learning Service, Discovery and Career Planning, Individual Employment Supports, Respite, Chore, Non-Medical Transportation, Private Duty Nursing, and Training and Consultation.

Public comment was taken from July 18, 2025, through September 2, 2025. A notice regarding the I/DD Waiver Amendment was posted in Honolulu Star-Advertiser, Hawaii Tribune Herald, West Hawaii Today, The Maui News, and The Garden Island. The public notice, as well as the link to a copy of the waiver renewal, was posted on the Department of Human Service, Med-QUEST Division (DHS/MQD) website medquest.hawaii.gov and the Department of Health, Developmental Disabilities Division (DOH/DDD) website health.hawaii.gov/ddd. A printed copy of the I/DD Waiver Amendment and special accommodations (i.e., interpreter, large print or taped materials) was available upon request. In accordance with Centers for Medicare and Medicaid Services (CMS) guidance, interested members of the public were given 47 days to submit written comments by mail or email from July 18, 2025, through September 2, 2025.

During the public comment period, the State received two written comments.

Appendix I-2 Rates, Billing and Claims: Comments in this section relate to Waiver service rates and direct support professional wages.

- **Comment:** A direct support professional (DSP) requested clarification regarding wages for DSPs. The commenter asked whether service providers can pay a higher wage to DSPs working with individuals with greater needs and whether the State will require providers to do so. In addition, they suggested that the State could do more to make DSPs aware of changes to provider payment rates and other policy changes.
- **Response:** As described in Appendix I-2-a, payment rates for most services were developed through an independent rate-setting approach. The rate models developed through this process include an assumed wage for direct support professionals. This assumption is meant to represent a typical or average wage. Service providers may, and are generally expected to, pay different wages to their staff based on factors such as experience and training, the shift worked, the difficulty of the work they are doing such as supporting individuals with more challenging needs, and other factors. The State, however, does not dictate the wages paid by providers.

The State appreciates the feedback and will consider strategies to better inform stakeholders of future changes to the waiver.

- **Comment:** A family member supported higher pay for DSPs.
- **Response:** The State appreciates the comment and recognizes the importance of adequate compensation, both wages and benefits, for DSPs to support the availability of quality services. The purpose of this amendment is to increase provider payment rates, primarily due to increased wage and benefit cost assumptions in the rate models. The State, however, does not dictate the wages paid by providers.