



March 4, 2014

Marilyn Tavenner, Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Room 445–G, Hubert H. Humphrey Building
200 Independence Avenue SW
Washington, DC 20201

RE: Home and Community-Based Services (HCBS) Settings Final Rule (CMS 2249-F/2296-F)

Dear Administrator Tavenner:

Madison House Autism Foundation and the supporting signatories offer appreciation of the earnest effort to balance many perspectives in your consideration of Home and Community-Based Services (HCBS) Settings Final Rule (CMS 2249-F/2296-F).

We were pleased to see that CMS is moving toward valuing the individual's choice and experience of home and community as described:

"In this final rule, CMS is moving away from defining home and community-based settings by 'what they are not,' and toward defining them by the nature and quality of individuals' experiences. The home and community-based setting provisions in this final rule establish a more outcome-oriented definition of home and community-based settings, rather than one based solely on a setting's location, geography, or physical characteristics." [Page 1, Summary of Key Provisions in the HCBS Setting Final Rule]

The process of public comments brought together many like-minded stakeholders who desire and support a full array of housing choices.

These voices are no longer fragmented. We have united to establish the Coalition for Community Choice (CCC) and today, I am writing on our behalf. The Coalition for Community Choice believes people with disabilities should have the broadest range of affordable and accessible housing options, and we encourage the formation of public-private partnerships to create local solutions for the national housing crisis.

We look forward to ongoing opportunities to work with CMS to offer more affordable and accessible housing options that meet the needs of such diverse populations. We are happy to provide information or insight to the issues that many people with intellectual and other

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developmental disabilities and their families face. To that end, CCC expressly requests the opportunity to review proposed State Guidance Letters and provide input before publication.

Thank you again for your efforts to consider so carefully all stakeholder input, and for the robust public comment opportunities at the state and federal levels that remain part of the Final Rule. We sincerely hope that CMS will continue to welcome public input as Guidance letters are drafted.

Sincerely,

JaLynn Prince, President and Co-Founder

Madison House Autism Foundation

A public 501 c 3 not-for-profit, national organization working to eliminate barriers and increase opportunities for the rapidly growing numbers of adults with autism.

*cc. Barbara Coulter Edwards; Director, Disabled and Elderly Health Programs Group, CMS
Ralph Lollar; Director, Division of Long Term Services and Supports, CMS*

(In alphabetical order by state)

NATIONAL ORGANIZATIONS

1. Agricultural Communities for Adults with Autism

Gene Bensinger, Co-Founder

A consortium of 35 established and developing provider organizations focused on sharing best practices and advocating for holistic, agricultural based employment and housing models for adults with autism.

2. FRED Conferences

Mari-Anne Kehler, Director

While originally focused on agricultural communities as a solution to the growing challenge for living options, FRED has grown into a movement to advance the ability for special needs adults to live with real purpose regardless of the housing options.

3. The Daniel Jordan Fiddle Foundation

Linda Walder Fiddle, Esq., Founder and Executive Director

Develop, advocate for and fund Signature Programs that create innovative blueprints for grassroots organizations and service providers to develop their own programs for the diverse population of adults living with ASD.

4. Families Speaking UP

Micki Edelson, Founder

Laurie Nicoli, Board Member

Pat Swanson, Board Member

A grassroots movement of people with IDD, their families and caregivers advocating for a variety of choices for ALL people with IDD

5. Madison House Autism Foundation

JaLynn Prince, President and Co-Founder

Desiree Kameka, Director of Community Education and Advocacy

A public 501(c) 3 not-for-profit, national organization working to eliminate barriers and increase opportunities for the rapidly growing numbers of adults with autism

6. VOR

Ann S. Knighton, President

A national organization that advocates for high quality care and human rights for people with intellectual and developmental disabilities

ARIZONA

7. First Place

Denise D. Resnik, Founder and Board Chair

Phoenix, Arizona

Dedicated to developing new housing options for adults with autism and related disorders.

8. Rainbow Acres, Camp Verde, AZ

Rhonda Owens

A Christian community with heart that empowers persons with developmental disabilities to live to their fullest potential with dignity and purpose

CALIFORNIA

9. Golden Heart Ranch®, Hermosa Beach, CA

Rose van Wier Hein, Founder/Executive Director

GHR is dedicated to building an intentional residential community where special needs young adults can live, learn, and work side-by-side in a harmonious and caring environment that is emotionally and physically safe.

10. Home of Guiding Hands (HGH), El Cajon, CA

Mark R. Klaus, President / CEO

A 501(c)(3) nonprofit public benefit corporation that provides quality support and training services to individuals with developmental disabilities. As an industry leader for more than 45 years, HGH is dedicated to providing innovative services that meet and exceed the needs of people with developmental disabilities.

11. Peak Partners LLC, Greenbrae, CA

Mark Jackson, President/Parent

A real estate investment and consulting company that is committed to creating high-quality, comprehensive living solutions for adults with developmental disabilities in small, integrated shared-housing settings

12. Sunflower Hill, Pleasanton, CA

Susan Houghton, President

Seeking to change the paradigm of institutional and home living options by creating a sustainable, supportive and intentional community for individuals with special needs that is akin to senior living

COLORADO

13. Rooster Ranch, Franktown, CO

Blair Wyles, Founder

Jeffery Galloway, OTR, HPOT, Board Member

Rooster Ranch, Inc. is a lifetime sustainable residential community serving intellectually & physically challenged adults and their families.

DELAWARE

14. Homes For Life Foundation, Wilmington, DE

Micki Edelson, Founder and Treasurer

A 501(c) (3) organization dedicated to raising funds to build safe and comfortable group homes for men and women with IDD

DISTRICT OF COLUMBIA

15. M&L Special Needs Planning, LLC

Maedi Tanham Carney, CFP®, CWIC

Educate families in an emphatic, methodical, non-threatening way by providing workshops and creating financial security with comprehensive special needs life plans and government benefit counseling

FLORIDA

16. The Arc Jacksonville, Jacksonville, FL

Jim Whittaker, Executive Director

Together we unlock potential for achievement at home, at work, and at play. The Arc Jacksonville believes we all have the right to be in community and to make personal decisions about how we live, learn, work and play.

17. Creating a Future for Adults with Autism, Inc. Naples, FL

Debby Lasek and Terry Kays, Co-Founders

Creating a safe, affordable, financially sustainable, long-term, co-housing community providing meaningful work, recreation, education and training for adults with autism and their families.

18. The Loveland Center, Venice, FL

Carl J. Penxa Jr., President/CEO

Loveland Center helps adults with developmental disabilities learn to make informed decisions and live their lives to the fullest.

19. Mariposa Foundation, Plantation, FL

Debbie Lawrence and David Williams Co-Founders

Provide a life-long learning environment to empower residents in a community that fosters belonging and purpose

20. Noah's Ark of Central Florida, Lakeland, FL

Jack Kosik, Executive Director

Addressing the concerns of people with developmental and intellectual disabilities

21. OCA (Opportunity / Community / Ability), Orlando, FL

Chuck Carter, President

It is OCA's goal that every individual that walks through our doors will have an Opportunity, in or out of the Community, to maximize their Ability.

22. Parents Planning Programming, Melbourne Beach, FL

Lila and Eugene Klausman, Co-Founders

An organization formed by parents seeking to prepare for the future of their loved ones who have developmental disabilities in Florida

23. Promise in Brevard, West Melbourne, FL

Luke & Betsy Farmer, Co-Founders

A place where young adults with special needs can live a life full of opportunities and freedom never thought possible

MARYLAND

24. Purple Cherry Architects & Purposeful Architecture, Annapolis, MD

Cathy Purple Cherry, Principal

Purposeful Architecture is an architecture firm committed to creating spaces that foster thoughtful learning and living environments that inspire creativity and individuality in our children and adults with special needs

MASSACHUSETTS

25. COFAR, Inc. (Massachusetts Coalition of Families and Advocates), MA

David Kassel, Director of Communications

A statewide, nonprofit organization that advocates for choice in, and access to comprehensive and high quality care for persons with intellectual and other developmental disabilities.

26. SAGE Crossing Foundation, Harvard, MA

Carol Fernandez, Vice President and Trustee

Create – and to help others create – farm-based programs where adults with autism can pursue supported, dignified, meaningful lives in concert with each other, and with their community.

MICHIGAN

27. AACORN Farm, Kalamazoo County, MI

Catherine Pinto, President

Provides a dynamic residential and vocational program for adults with Autism Spectrum Disorder in an agricultural community that supports individuals in reaching their full potential through meaningful interactions, work, and leisure activities

28. Benjamin's Hope, Holland, MI

Krista Mason, Founder and Executive Director

An emerging, interactive community where people with extraordinary needs will realize a future of meaning, security and hope

29. The DD News Blog, Ann Arbor, MI

Jill Barker, Founder / Parent

Advocating for a full range of service and residential options to meet the diverse needs of people with IDD

NEVADA

30. LTO Ventures, Henderson, NV

Mark L. Olson, President and CEO

LTO Ventures is a 501(c) (3) non-profit company in Henderson, NV that develops live/work/play communities for adults with autism spectrum disorders.

NEW HAMPSHIRE

31. Farmsteads of New England, Inc., Hillsborough, NH

Deborah DeScenza, Founder

Farmsteads of New England, Inc. was created to provide a farming environment that is conducive to a meaningful and satisfying life for people who have autism and other I/DD and who are seeking a holistic lifestyle that supports their vocational, recreational, and residential needs.

NORTH CAROLINA

32. 3 Irish Jewels Farm, The Triangle of NC

Erin O'Loughlin, Founder

An environmentally sustainable agricultural community where adults on the autism spectrum can live dignified and meaningful lives with support in a healthy, safe and enriching environment and achieve independence through meaningful work, recreation and community involvement.

OHIO

33. Bittersweet, Whitehouse, OH

Vicki Obee, Executive Director

The mission of Bittersweet is to maximize opportunities for individual development of persons with Autism by providing an array of premier residential educational and vocational services to individuals, and support to families\

34. Safe Haven Farms, Middletown, OH

Dennis Rogers, President

Provides a variety of meaningful living, working, learning and leisure activities in a safe and accepting farm environment, where every individual is respected as a valued and contributing community member.

TEXAS

35. Blessings Ranch, Cameron, TX

Kim Wise, Founder

A working ranch and residential community for adults with developmental disabilities

36. Marbridge, Manchaca, TX

Scott McAvoy, Vice President of Operations

A non-profit residential community that offers transitional and lifetime care to adults with a wide range of cognitive abilities and—through compassion and faith—provides them opportunities to learn, experience and achieve a whole new life

VIRGINIA

37. A SPLINT (ASPIes Linking with NTs), Alexandria, VA

Jeffrey Deutsch, PhD., Founder / Self-Advocate

Help people on and off the autism spectrum to better work, live and love together, through consulting, coaching, inspirational speaking and training

WASHINGTON

38. Action DD, WA

Paul Strand, President

Action DD is the only disabilities advocacy licensed in Washington state that receives no government money. Therefore, free to represent the best interests of people with developmental disabilities.

39. Because We Care - Beyond Inclusion, Seattle, WA

Cheryl Felak, RN, BSN, Founder

Holistic care approach supporting a continuum of care which looks at individual, family and community strengths to promote health, safety, relationships and quality of life for people with intellectual disabilities

40. Lakeland Village Associates, Medical Park, WA

Bonnie Sullivan

Friends and family of those who live at Lakeland Village.

WEST VIRGINIA

41. Autism Services Center, Huntington, WV

Mike Grady, CEO

A licensed behavioral health center specializing in autism, ASC provides comprehensive, community-integrated services to all individuals with intellectual and developmental disabilities