

Disability Rights New Jersey appreciates the opportunity to comment on the Comprehensive Medicaid Waiver Concept Paper. DRNJ is the designated protection and advocacy system for individuals with disabilities in New Jersey pursuant to the Developmental Disabilities Assistance and Bill of Rights Act, 42 U.S.C. §§ 15041 to 15045; the Protection and Advocacy for Individuals with Mental Illness Act, 42 U.S.C. §§ 10801 to 10807, and the Rehabilitation Act, 29 U.S.C. §§ 732, 794e.

DRNJ sincerely hopes that the State will achieve its goal of improving access to services for those most in need of those services. DRNJ is concerned, however, that not all components of the current proposal will contribute to meeting that goal.

DRNJ opposes any and all provisions that restrict eligibility criteria for services and that create additional barriers to services for individuals who remain eligible.

DRNJ is very concerned about the existing fragmentation of services between physical and behavioral health services, as well as the lack of coordination among behavioral health services, addiction services, and services for individuals with developmental disabilities. Currently, individuals in need of services from all three or even two of these systems still find it difficult to obtain adequate services from even one.

Individuals in need of mental health services are already confronted with the lack of communication and coordination between the children's and adult system of services. From the perspective of the consumer, bifurcating the adult system between HMO- and ASO-managed systems is likely to create confusion and additional obstacles to comprehensive and coordinated services. DRNJ urges consideration of a single system of behavioral services not only for adult services, but also encompassing both children's and adult services.

Whatever structure the State adopts, it is absolutely necessary that the responsible government agencies retain sufficient infrastructure to ensure that the managing entities are responsive, responsible, and accountable. Government must remain involved as an advocate for the intended recipient of services on both the systems and individual levels.

DRNJ looks forward to continuing to work with the Departments of Human Services, Health and Senior Services, and Children and Family Services on behalf of individuals with disabilities.