

2023 – 8-31 Draft language re: House Bill 4841

Oakland Community Health Network (“OCHN”) is the Prepaid Inpatient Health Plan (“PIHP”) and Community Mental Health Services Providers (“CMHSP”) providing public behavioral health services in Oakland County. OCHN and its network of providers serve Individuals with Intellectual/Developmental Disabilities (“I/DD”), adults with Mental Illness (“MI”), children with Serious Emotional Disturbances (“SED”), and people with Substance Use Disorders (“SUD”). Our service array includes contracts with 83 Specialized Residential Services (“SRS”) providers who support people with I/DD and/or MI in licensed Adult Foster Care (“AFC”) facilities.

This communication is provided to address concerns regarding the proposed legislation in House Bill 4841. Concerns include:

- The requirement to maintain a social worker on staff with a minimum availability of one hour per week per resident.
 - All individuals served via the public behavioral health system have access to Supports Coordination/Case Management (“SC/CM”) services as identified in the Individual Plan of Services (“IPOS”). Requiring SRS providers to maintain a social worker on staff would be a duplication of Medicaid services and an inefficient use of public resources.
- The requirement to maintain a Licensed Practical Nurse (“LPN”) on the premises 24 hours per day, 7 days per week.
 - Most individuals served do not require nursing services; those who do have access to nursing care as identified in the IPOS.
 - Displacing a Direct Support Professional (“DSP”) to maintain an LPN on site at all times is not medically necessary and will significantly increase costs to maintain operations in a home.
- The requirement that all DSPs, within 90-days of hire, complete continuing education core classes related to seven (7) topics.
 - DSPs have training requirements as detailed in the Michigan Mental Health Code which are required to provide services to individuals with I/DD and/or MI in SRS homes.
 - Additional training topics will exacerbate the already stressed and understaffed DSP workforce.

OCHN understands and appreciates the intent behind House Bill 4841; however, the measures detailed in the bill will only create additional administrative burden to an already understaffed and under supported network of service providers.

OCHN encourages legislation that implements effective changes for SRS providers and that allows DSPs to be paid a living wage for their essential services to people with disabilities.