

From: [Robin Shaffert](#)
To: [Stephan, Peter \(EOM\)](#)
Cc: [ATD ODR](#)
Subject: Re: District Olmstead Plan First Draft
Date: Monday, July 15, 2024 2:36:29 PM

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Dear Peter,

Thanks to you and the ODR team for all the effort that went into the first draft of the next Olmstead plan. I am going to try and attend as much of Wednesday's town hall as I can. I have a couple of prior commitments that day that will make it a challenge. Hence, I am going to share comments below on specific strategies, metrics, targets, etc.

In the draft, many of the baselines and targets are blank. Since these are critical elements of the plan, it is hard to comment comprehensively. I noted that in some instances the targets in the draft are below the baselines. I am hoping that is because the Olmstead plan is still a work in progress and that won't be the case when a final draft is disseminated.

Here are some specific comments:

Housing

Re-Entry Housing Support Program p. 11 – Support to enroll in DDS/DDA services should be included in this program

Strategies 1.1.1 and 1.1.2 – Need to measure access of people with disabilities to these housing units

Strategy 1.1.9 – Should include access to DDA/DDS services (per note above)

Strategy 1.2.3 – There should be similar metrics for enrollment in the IDD and IFS waivers

Healthcare

Re-Entry Services for Medicaid and Mental Health p. 23 - This program should include an assessment to identify residents with intellectual and developmental disabilities as well as residents in need of mental health services. Suspension and reinstatement of Medicaid should also apply to people with IDD and people eligible for the EPD waiver. Assessments should comply with District and federal requirements for accessibility and language assistance services.

Lack of LTCSS for people with disabilities who want to work prevents employment – p. 23: Where are the goals to raise asset and income limits?

Strategy 2.1.3 Add metrics to decrease days between application and eligibility determination for IDD and IFS waivers

Strategy 2.1.8 Add metrics for training of provider staff

The Healthcare strategies focus on increasing integration through Medicaid waiver services. Discrimination against people with disabilities throughout the healthcare system also leads to segregation of people with disabilities. The US Department of Health and Human Services strengthened the regulations under Section 504 of the Rehabilitation Act prohibiting discrimination on the basis of disability in federally funded healthcare programs. HHS also

released a new plan detailing language access requirements. The District's Olmstead Plan should include strategies and metrics to ensure that DC health care providers are aware of and complying with these updated regulations. One potential strategy would be for DC Health to implement a training program for healthcare organizations and providers in the District about the requirements of the revised regulations and for the Olmstead plan to track metrics related to that training.

Employment

Strategies 3.2.1b, 3.2.1c, 3.2.2, 3.3.3, and 3.4.1 should track percentage rather than number.

Metric 3.4.3a – Is average hourly wage the proper metric for this goal or should we track median or percentage of clients whose wages are above the minimum wage? Concern with using average hourly wage as the metric is that a few high paying jobs can skew the metric.

Metric 3.3.3f – Create separate metrics for people receiving services under the IDD waiver and under the IFS waiver.

Strategy 3.4.5 – Add a metric to track collaboration between DOES and DDA.

Strategies to address Medicaid asset and income limits should be added.

Strategies and metrics related to the State as a Model Employer initiative should be added.

Transportation

Metric 4.1.1 – Metric should track not only the number of building sites assessed but also the percentage found to meet standards

Strategy 4.2.1 – Metrics should track the percentage of buses arriving at least 10 minutes before school instruction begins in the morning. Should add a metric tracking on time pickups.

Metric 4.3.3. –Need to revise the metric to track level of enforcement. Number of tickets issued for bus lane infractions could be reduced either because there are fewer violations or because there is less enforcement. It isn't clear that lower is better.

Please let me know if you'd like more information concerning the comments. I hope you and the team are hanging in there through this heat wave.

Best,

Robin

On Tue, Jul 2, 2024 at 3:20 PM Stephan, Peter (EOM) <peter.stephan@dc.gov> wrote:

Dear Olmstead Taskforce,

Thanks so much for your participation in the Second Townhall. As promised, we are happy to share the first draft of the 2025-2027 District Olmstead Plan. It is available to download

directly here:

https://odr.dc.gov/sites/default/files/dc/sites/odr/page_content/attachments/2025-2027%20District%20Olmstead%20Plan%20First%20Draft_0.pdf

It is also linked from ODR's Olmstead webpage here: <https://odr.dc.gov/page/olmstead-community-integration-plan-dc-one-community-all>

Please send an email to odr@dc.gov or call ODR at 202-724-5055 for any questions or to submit comments and feedback regarding the draft. Please note that ODR is planning to draft two more versions of this plan before issuing a finalized version by the end of December 2024.

We will also have a virtual meeting on July 17, 2024 at 2pm, to discuss this first draft and gather feedback. Register here: <https://districtsolmsteadfirstdraftvir.splashthat.com/>. To request an accommodation, please email odr@dc.gov or call us at 202-724-5055 before July 10, 2024.

We look forward to your participation.

Sincerely,

Peter

Peter Stephan, Attorney Advisor (he/they)

Executive Office of the Mayor - Office of Disability Rights

441 4th Street NW, Suite 729N

Washington, DC 20001

peter.stephan@dc.gov

Main: 202-724-5055

Cell: 202-288-3167

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Robin L. Shaffert

(she/her/hers)

Senior Policy Associate and Research Instructor

Georgetown University Center for Excellence in Developmental Disabilities

2115 Wisconsin Avenue, NW, Sixth Floor

Washington, DC 20007