

**From:** [Sunset Advisory Commission](#)  
**To:** [Dawn Roberson](#)  
**Subject:** FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Friday, June 27, 2014 1:35:01 PM

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-----Original Message-----

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Friday, June 27, 2014 9:38 AM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Friday, June 27, 2014 - 09:38

Agency: DEPARTMENT AGING AND DISABILITY SERVICES DADS

First Name: Jeri

Last Name: Slone

Title: President

Organization you are affiliated with: Bluebonnet Homes, Inc.

City: San Angelo

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed:

As an private ICF/ID provider, I would like to state that I support the Sunset Commission's Report for DAD's. My comments are:

1. State Supported Living Centers are never going to be successful in their care for the disabled because none of the staff have any vested interest in the programs. When you have a financial interest, have to find the money to provide care, have to financially meet payroll, ensure vacant beds are filled, etc. you take a more proactive approach to consumer care to prevent negative findings.
2. Very rarely is a State Living Center Superintendent fired, but merely reassigned.
3. THERE IS A NEED FOR A STATE LIVING CENTER OR TWO, as some consumers cannot safely live in the community.
4. Consumers referred for community placement are ALWAYS REFERRED TO THE HCS PROGRAM, NOT ICF PROGRAM. No where is it written not to refer to ICF programs, but it is an unspoken rule.
6. The Commission's report proved that ICF/ID services are cheaper than HCS services, which DADS and the LBB have refuted for years. The waiver's require that services be cheaper than ICF/ID, yet DADS wants to expand HCS services so this is overlooked.
7. An argument is that ICF/ID are classified as institutions, yet State Law also classifies HCS residential as institutions.
8. The movement of client abuse and neglect investigations to DFPS was a complete farce. This was done, in my opinion, to ensure the State Supported Living Centers were not investigated by DADS ICF/ID Surveyors. The ICF/ID programs has much more stringent requirements and definitions of abuse than

DFPS. Therefore, less gets classified as abuse/neglect. As an ICF/ID provider I would much prefer to meet the stringent ICF/ID Federal and State standards as they provide a much broader consumer safety net and there are stringent punishments available.

Any Alternative or New Recommendations on This Agency:

1. Have all HCS residential group home living programs converted to 6-bed ICF/ID.

This will save vast amounts of money, draw down QAF match, provide consumers the Active Treatment necessary to ensure independent living skills are taught AND RETAINED, as well as provide a safe environment with less abuse/neglect.

2. Close all State Supported Living Center Hospitals and seek community hospital care.

3. The Sunset Commission should do a review of all consumers referred and placed in community settings. This review would find that they are not referred to ICF, which is cheaper and has a more restrictive environment and ACTIVE TREATMENT for consumers who need a higher level of care.

My Comment Will Be Made Public: I agree