



Personal Assistance  
Services Council  
Of  
Los Angeles County

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February 5, 2015

Anastasia Dodson  
California Department of Health Care Services  
Via Email: [WaiverRenewal@dhcs.ca.gov](mailto:WaiverRenewal@dhcs.ca.gov)

**RE: Section 1115 Medicaid Waiver Renewal – Workforce Development  
In-Home Supportive Services**

Dear Ms. Dodson:

The Personal Assistance Services Council is the LA County In-Home Supportive Services (IHSS) public authority. Over 190,000 seniors and people with disabilities receive IHSS services from over 130,000 providers. We have spoken with thousands of individuals through our registry, telephone town halls, consumer outreach, and training programs. We hear their concerns, complaints, suggestions, and oftentimes, we hear about their fear of changes taking place in IHSS, including the training proposal in the 1115 Waiver Renewal. Although the current SEIU proposal is for voluntary training many are concerned this type of sole source training cuts out the consumer's role and undermines consumer directions. We fear this is the first step towards mandating provider training which we strongly oppose.

Furthermore IHSS is a social model program not a medical model program—IHSS recipients are not patients and their homes are not a clinical setting. We are concerned the proposed training will make the IHSS program a medical model which again PASC opposes.

The SEIU training proposal undermines the key role consumers have in training their IHSS provider and directing their own care. Consumer directed care is the foundation of the program; consumers are experts on their own lives; they are the ones who are best able to direct the services they receive. IHSS makes it possible for people with disabilities and seniors to live productive lives in the community without being forced into institutions.

Consumers and their providers establish their working relationship and decide together on what training is needed. The idea of mandating training or instituting any standardized medical training program would interrupt this important arrangement that is unique for each consumer.

IHSS is a grassroots program developed in the 1970s by several individuals with disabilities who were forced to live in a hospital because of the level of care they required. They convinced CMS it was cheaper to pay for homecare than hospital care. The original intent of the IHSS Program was to allow people with disabilities to live in the community and experience a greater quality of life not possible locked away in an institution. IHSS is the largest and oldest consumer-directed homecare program in the country and is a social model program for home- and community-based long-term services and supports.

PASC provides access to training for both IHSS consumers and providers through classes in their community and through our peer mentor program. Our commitment to consumer direction in IHSS goes hand in hand with improving quality of services. PASC supports voluntary training for IHSS providers where the curriculum is developed in collaboration by consumers and providers, and offered by multiple sources.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Thompson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Greg Thompson, L.C.S.W  
Executive Director  
gthompson@pascla.org

cc: CDSS Director Lightbourne  
Donna Campbell, Governor's office