



June 28, 2018

WisTech Program
ATTN: State Plan
1 W. Wilson Street, Room 551
PO Box 2659
Madison, WI 53701-2659

Dear Mr. Aumanstal:

The Wisconsin Board for People with Developmental Disabilities (BPDD) appreciates the opportunity to submit public comments on the State Plan for Assistive Technology (AT) 2018-2020. Assistive Technology is critically important for people with significant Intellectual and/or Developmental Disabilities (I/DD).

Physical disabilities are often co-occurring with I/DD, and many people rely on Assistive Technologies to improve mobility, capacity to perform daily living tasks, communicate and increase independence. Advances in Assistive Technology have allowed many non-verbal people to communicate effectively and directly with teachers, doctors, professionals, family, peers, and others.

The importance of Assistive Technologies in the lives of people with I/DD cannot be overstated; it often makes the difference between someone being able to live and be employed in the community versus being socially isolated and fully dependent on public assistance programs and family for all needs.

BPDD hears from families and people with I/DD across the state that access to Assistive Technology is insufficient, and even getting the required assessment can be a difficult—if not an impossible—process for many families.

While the plan recognizes there are unmet needs, it is unclear how the Department intends to address those needs. This plan does not appear to include: specific strategies on assessing underserved populations and geographic areas; examination of current processes that may cause confusion or be barriers to assessments/access to Assistive Technologies; or specific metrics that demonstrate improvement in awareness/knowledge of and acquisition of Assistive Technology by identified underserved groups, including people with I/DD and older adults.

The plan includes little reference to Assistive Technology for employment purposes, even though DVR consumers are identified as an underserved group. It is unclear how the reference to Assistive Technology workforce development plan—identified as a deliverable under the sustainability goal—fits into this state plan.

BPDD supports the Department's community integrated employment principles, implementation of the Home and Community Based Settings (HCBS) rule, and commitment to improving community integrated employment outcomes for people with disabilities in Wisconsin's long-term care programs (Family Care, IRIS). To that end, Assistive Technology can be an important factor to improve employability for people with significant disabilities. In addition to the ADA assessments for the businesses under Goal 1, BPDD recommends this plan should require Assistive Technology assessments for reasonable accommodations in the workplace.

Many people with I/DD, physical disabilities, and older adults are participants in Family Care or IRIS, and Medicaid funds can be used to pay for needed Assistive Technologies as long as they are identified within an individual's care plan. Assistive Technologies—like remote monitoring, automated medication reminders, installing grab bars and other safety equipment, and technology platforms that can host applications that improve communication, self-sufficiency, and independence—can improve people's homes and employability while also providing cost-savings to Wisconsin's long-term care programs.

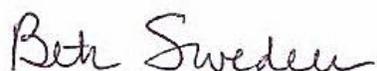
BPDD recommends including a goal of improving the ease with which Assistive Technology can be acquired under Medicaid-funded programs and services, including Family Care/IRIS, CLTS, and the Forward HealthCard.

BPDD also notes that the plan shows that the bulk of Assistive Technology Act funding goes to Wisconsin's Independent Living Centers (ILCs). While ILCs do useful work, there is a large part of the disability community that would benefit from Assistive Technology—including people with Intellectual/Developmental Disabilities and sensory disabilities—who do not routinely connect or participate with ILCs. BPDD recommends diversifying Assistive Technology Act funding to additional entities that have routine interactions with older adults and children/adults with I/DD, including Aging and Disability Resource Centers (ADRCs), county Children's Long-Term Support (CLTS) programs, and Cooperative Educational Service Agencies (CESAs).

Under knowledge goal 3, the plan proposes holding three regional trainings annually. Our experience finds that those trainings are not reaching audiences beyond the ILC world, and consequently populations identified as having unmet needs (older adults, people with I/DD) are unaware of these opportunities. BPDD recommends that training opportunities be shared directly with a wide array of advocacy groups that primarily focus on older adults, people with disabilities, and individuals/families.

BPDD is charged under the federal Developmental Disabilities Assistance and Bill of Rights Act with advocacy, capacity building, and systems change to improve self-determination, independence, productivity, and integration and inclusion in all facets of community life for people with developmental disabilities.

Thank you for your consideration,

A handwritten signature in cursive script that reads "Beth Swedeen".

Beth Swedeen, Executive Director, Wisconsin Board for People with Developmental Disabilities