

- **It is recommended that DDDS always consider the question, “How can we collaborate with providers and families/guardians in relation to this issue?”**

Rationale: DDDS needs to include providers and families/guardians in their early planning, problem-solving, and communications for new regulations, procedures, approaches, etc. Just as DDDS could benefit from the wealth of knowledge and experience found in the service provider community, there is another perspective of knowledge and experience that should be obtained through collaboration with families/guardians.

- **It is recommended that as DDDS considers new regulations, systems, projects, etc. they be required to address the question, “How does the acknowledged under-reimbursement of providers impact their ability to meet this requirement?”**

Requiring the Division to address this question somewhat formally would be analogous to a “fiscal note” for proposed legislation. DDDS acknowledges the significant underfunding yet does not openly consider the impact of that financial hardship on providers. While the Division may not be able to avoid imposition of various regulations originating from CMS, they still have a responsibility to pursue requirements and solutions that are within conceivable reach of the provider system they have created.