October 2, 2015

To whom it Concerns:

What is the real reason for Betty's Village that makes sense for the future resident? Why can't these homes be spread throughout the city? What is it about Betty's Village that is any different from maintaining community-based ISLAs? And if staffing, staff training, housemates, and knowing individual's needs are concerns in ISLAs, the problems won't be solved by stuffing everyone into one village.

As two mothers of young adults with developmental disabilities at the different ends of the functional spectrum, we are BOTH strongly opposed to the development of Betty's Village. Echoing the comments made by the NGCDD, NDALC, Mary Bryant, and the Hammonds, we are particularly concerned about the following:

1. Setting a precedent for Segregation:

Betty's Village appears to be a euphemism for giving people informed individual choice, but *how is it any different than what was at Sierra Regional Center in Sparks in the past?* Establishing a segregated community is regressive and antiquated thinking. It takes us back in time to a system where people were intentionally grouped geographically for the convenience of the provider.

2. Informed Choice:

Merriam-Webster defines "choice" as picking between two or more possibilities, and this is the intent of the HCBW policies. Because of the size and scope of the Betty's Village project, our fear is that this will be presented as the only available choice to people with disabilities, essentially negating the concept of informed choice. Future residents and their families may not realize if/when choices are being intentionally limited and directed toward a segregated community just to be sure to fill all those bedrooms. What guarantee do we have that the individuals being served will be presented with more than one financially viable option when considering Betty's Village?

Along these same lines, there will be those in favor of Betty's Village who compare it to retirement communities. The difference is that retirees have multiple choices of how to live out their lives and make their choices from a fully informed perspective.

3. With whom they live:

Looking at the plans shows residents will have their own bedroom and bathroom, but will share key living areas and dining with other residents. How is this different than what is described as the problem with existing ISLAs? It is not clear in the proposal just how this will be addressed, and in fact, the designs are very similar to what Sierra Regional Center had. Everyone had their own room, and shared common areas. Perhaps SRC was a bit better because residents only had to eat with 5 people not a whole community.

4. Staff needs and reimbursement rates:

The shortcoming of existing Intensive Supporting Living Arrangements - as pointed out on page 1 of the proposal – is that current ISLAs cannot support the number of staff necessary for community integration. How is Betty's Village going to change that? What is the real barrier to that happening now? We know its money, and that Betty's Village is a way of providing

services and supports with economy of scale. But should this be the only choice? That is our real concern - people with developmental disabilities will be forced to choose a segregated community such as Betty's Village because it is the only viable economic choice they have.

Another issue that needs special attention is staff reimbursement rates. From a human resources angle, if you don't pay well enough, turn over is high. When turn over is high, keeping staff up-to-date and well informed is impossible in any job setting. In DD services in Nevada, we have seen staff leave for greener pastures before they fully understand the basics of person centric-planning and services, much less translate that into meeting a person's unique needs. Changing the housing situation is not going to fix it. And even if there are cost-savings at hand with Betty's Village, let's avoid this whole expensive, controversial project and put the same dollars to use NOW where they count – into better reimbursement for staff in community based settings.

5. Provider convenience:

Why can't the Enlightened Living model happen in a community that is not segregated – one in neighborhoods where the neighbors DON'T have disabilities? If the model is that wonderful, as a State we should find a way to make it work in non-segregated communities. If this is all about provider convenience and budgeting, the focus on person-centeredness is lost.

7. Legality of this proposal:

Please refer to NDALC's letter of opposition. The Supreme Court has made it <u>clear</u> in their 2014 ruling against Rhode Island that segregated environments <u>cannot be funded by Federal Medicaid dollars</u>. It would be prudent to speak with the employment task force about their progress in least segregated employment services. Nevadans with disabilities would be justified in filing a similar class-action lawsuit similar to those in Rhode Island, Florida, New York, California, Oregon and others due to what is and will eventually be labeled as a segregated community. Betty's Village does not meet the criteria for inclusive community living. Where are the people without disabilities in Betty's Village? If they are just paid staff, or volunteers, it is a contrived inclusion and not real inclusion.

Beauty is only skin deep. No matter how gorgeous the homes and buildings, no matter what rhetoric is thrown at the project in terms of inclusion, choice, person-centric efforts, etc., THIS IS JUST THE MOST RECENT ITERATION OF AN INSTITUTIONAL LIVING. Make no mistake about that. This is not the direction that the leaders in developmental disabilities in Nevada want to go. Refer to People First, NDALC, and NGCDD. These are the voices of those involved. Betty's Village is a huge step backwards by segregating people with disabilities and sets a dangerous precedent. It will be difficult to undo, as well. Let's not go there!

Sincerely,

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