

# Assistive Technology and Services Policy

## Stakeholder Input Summary

Assistive Technology and Services is one of the DDA-operated Waiver Program support service. This service supports participants to obtain an item, piece of equipment, or product system. The purpose of these items are to maintain or improve a participant’s functional abilities and promote independent living and meaningful community participation.

The Developmental Disability Administration (DDA) issued its proposed policy for Assistive Technology and Services on January 30, 2023, requesting input from participants, families, Coordination of Community Service agencies, community providers, and advocacy organizations. The stakeholder input period ended on February 13, 2023. In total, 10 unduplicated stakeholders submitted input. Below is a summary of the stakeholder recommendations and the DDA’s responses.

	Comment	DDA Response
1.	<p>Comment: The policy appears eminently reasonable and helpful. I especially appreciate that not only assessment and acquisition services are available, but also installation and instruction for the Participant, family, and support staff. It is critical that the technology be personalized to the needs of the Participant, and the policy appears to support this.</p>	<p>The DDA appreciates all comments and feedback.</p>
2.	<p>Comment: All participants should be allowed to purchase a chromebook.</p>	<p>The purpose of Assistive Technology is to maintain or improve a participant’s functional abilities, enhance interactions, support meaningful relationships, and promote their ability to live independently, and meaningfully participate in their community</p> <p>Each person’s person-centered plan provides a picture of the person’s self-identified Good Life, and includes various focus area exploration topics such as employment, community living, etc. Based on the information that comes out of focus area exploration, the team works with the person to determine the most appropriate service(s) to support their needs.</p>

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		<p>The Charting the LifeCourse Integrated Star is a useful tool for people, families, and teams to consider an array of integrated supports to achieve the envisioned good life, including those that are publicly or privately funded and based on eligibility, community supports that are available to anyone, relationship based supports, technology, and also take into account the assets and strengths of the individual and family. This tool is helpful to get a more comprehensive look at all the services and supports that may exist in a person's life; not just eligibility specific supports.</p> <p>Authorized services are based on an assessed need and waiver service and may include a chromebook.</p>
3.	<p>Comment: The use of Assistive Technology will be as individualized as the people using it. Please make whatever list is included as comprehensive as possible, but don't make it limited to what is listed. New technology, less frequently needed items, or other circumstances will come up.</p>	<p>Assistive Technology is specific to each person's individual needs. There have been and will continue to be advancements in Assistive Technology to enable people to live independent lives.</p> <p>This policy includes a list of types of Assistive Technology instead of an exhaustive list.</p>
4.	<p>Comment: Consider including related items such as software and apps, warranties, device insurance and virus protection software, replacements, repairs, related hardware etc. as part of what is funded.</p>	<p>Assistive Technology means an item, computer application, piece of equipment, or product system. Software is considered a product system. Repairs are included in this policy. Virus protection software may be included if it is required for the participant to effectively use the Assistive Technology. This may be part of the installation or maintenance of the Assistive Technology.</p>

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		<p>It may not be covered if it was not required for effective use of the Assistive Technology.</p> <p>The DDA will add “software” as part of the definition to now read: Assistive Technology means an item, computer application, software, piece of equipment, or product system.</p>
5.	<p>Comment: Remote supports should be easy for people to get. There are many opportunities for remote support that do not need professional assessments and protocols.</p> <p>As a Technology First State, everyone should have an opportunity to consider Remote Supports irrespective of a clinical judgment protocol. We should not need an ATP Assessment for someone to use remote supports for daily living reminders or reminders at work, or Alexa or Echo to turn on lights, control the thermostat, turn on the TV, or answer the door. These opportunities for remote supports do not need professional assessments and protocols.</p>	<p>The current Assistive Technology and Services includes remote support devices. Additionally, an Assistive Technology Assessment is an option, but is not required for Assistive Technology that cost less than \$1,000.</p> <p><b>Please note:</b> In the upcoming Waiver Renewal the DDA proposed increasing the cost threshold that would require an Assistive Technology from \$1,000 to \$2,500.</p>
6.	<p>Comment: MDTAP is NOT a funding resource for Assistive Technology. Please remove from reference in the Assistive Technology Policy as it relates to Eligibility Criteria.</p>	<p>The DDA removed the requirement for MDTAP to be used as a funding source in this policy.</p> <p>Note: MDTAP is a resource for people to explore and experience what is available in Assistive Technology that will improve people's access to live on their own and their community. MDTAP also partners with a non-profit organization to provide a loan product to assist with the costs of products for individuals and families who can demonstrate their ability to repay the loan.</p>

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7.	<p>Comment: Clarify whether examples of Remote Supports "health monitoring" include "<i>Automated Medication Dispenser Systems</i>"</p>	<p>The current Assistive Technology and Services policy includes remote support devices such as health monitoring devices and personal emergency response systems.</p> <p>Automated Medication Dispenser Systems may be considered as Assistive Technology For a participant based on their assessed need and as documented in their person-centered planning team.</p> <p>Note: A self medication assessment would be conducted by a nurse to determine if the person is capable of self medicating.</p>
8.	<p>Comment: Recommend adding language to the Section, 'Standards for Assistive Technology':</p> <ul style="list-style-type: none"> <li>a. #7 Cognitive support devices and items, such as computer <b>or phone</b> applications, task analysis applications, or reminder systems;</li> <li>b. #8 Remote support devices <b>or applications for computer or phone</b>, such as assistive technology health monitoring (e.g., blood pressure bands and oximeter) and personal emergency response systems;</li> </ul>	<p>The DDA will update the policy to add this language.</p>
	<p>Comments:</p> <p>(A) Recommend for Smartphones to be covered by this Waiver service program.</p> <p>Smart Phones and appropriate Apps should not be a blanket exclusion (C 5.) "Smartphones" with justification of why that is the</p>	<p>The DDA will add language as applicable to include the usage of "software" and product systems.</p> <p>Smartphone devices and associated monthly service costs are not included in the federally approved Assistive Technology and Services Waiver service.</p>

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<p>best option for the participant should be allowable if Medicaid available phones aren't a fit.</p> <p>Smartphones:</p> <ol style="list-style-type: none"> <li>a. Function as a speech and communication device at a lesser cost</li> <li>b. Text to speech and vice versa – virtual assistant</li> <li>c. Environmental controls such as voice activated technologies</li> <li>d. Personalized reminder systems and calendar alerts</li> <li>e. Allow for contiguous communication from one device to another - continuity</li> <li>f. Used to locate an individual needing help or being lost</li> <li>g. Stores emergency information for those with limited communication</li> <li>h. Can be used for employee/employer EVV or electronic timekeeping which is now mandatory</li> </ol> <p>(B) Recommend adding language to the Section, Exclusions:  <i>#5 Smartphone devices and associated monthly service costs, unless such smartphone device is the most effective and cost-efficient method of supporting the participant, as evaluated and approved by DDA.</i></p>	<p>Additionally, there are many resources where people can access smartphones including but not limited to: Safelink Wireless <a href="https://www.safelinkwireless.com/">https://www.safelinkwireless.com/</a>; Maryland Free cell phone providers: Access Wireless, American Assistance, Assist Wireless, Assurance Wireless, Cintex Wireless, Conexion Wireless, EnTouch Wireless, Life Wireless, Q Link Wireless, Safelink Wireless, Stand Up Wireless, Tag Mobile, Tempo Communications, Terracom Wireless, TruConnect, and US Connect.</p> <p>Lifeline is a federal program that lowers the monthly cost of phone and internet. It provides subscribers a discount on monthly telephone service, broadband internet access service, or a voice-broadband bundled service purchased from participating providers. Medicaid recipients are eligible for Lifeline.</p> <ul style="list-style-type: none"> <li>• <a href="https://www.fcc.gov/consumers/guides/lifeline-supportaffordablecommunications">https://www.fcc.gov/consumers/guides/lifeline-supportaffordablecommunications</a></li> <li>• <a href="https://www.lifelinesupport.org/">https://www.lifelinesupport.org/</a></li> </ul>

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9.	<p>Comment: Assistive Technology and monthly access fees if applicable, should be made available through Waiver services to people who self direct their service to ease and make possible their role as employers.</p>	<p>Assistive Technology and Services is available to people who self-direct their services.</p> <p>The DDA proposed internet service be an allowable item under Individual and Family Directed Goods and Services (IFDGS). IFDGS are services, equipment or supplies not otherwise provided through this Waiver or through the Medicaid state plan. If approved, the policy will be updated.</p>
10.	<p>Comment: Assistive Technology and Services should include the addition of;</p> <ul style="list-style-type: none"> <li>a. Initial fees to initiate the use of Assistive Technology</li> <li>b. Monthly or any ongoing service that provides access to the use of the technology</li> <li>c. Computer or other device itself that holds the Assistive Technology if the computer or other device is not the Assistive Technology itself.</li> </ul>	<p>Assistive Technology and Services includes applicable fees related to obtaining the AT, maintenance, instruction and installation of the device or support.</p> <p>Assistive Technology and Services does not include monthly internet fees.</p>
11.	<p>Comment: Recommend adding language to the Section, Rates:  <i>“Rates shall be reasonable, customary, and necessary, as determined for the participant’s needs and recommended by their team, as indicated as appropriate in the latest version of DDA rate guidance for all services.”</i></p>	<p>Assistive Technology and Services does not have specific rates. Assistive Technology costs vary based on the specific items, devices, and services. Therefore, the rates should be reasonable, customary, and necessary, as determined by the participant’s needs and recommended by their team.</p>

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12.	Comment: Please clarify where to document the assessed need for Assistive Technology in the PCP.	Assistive Technology or Assistive Technology Assessment should be documented within the Focus Area of Exploration based on the participant's assessed need. Reference: <a href="#">PCP Development and Authorization</a> guidance.
13.	Comment: Add language to the definition of Legally Responsible Person to be the same as is in the Waiver: "Legally Responsible Person" is an individual who has a legal obligation under the provisions of Maryland law to care for another individual. This includes: <ul style="list-style-type: none"> <li>a. A parent (either natural or adoptive) <i>of a minor</i>, legal guardian; or</li> <li>b. An individual otherwise legally responsible for the care of a minor (e.g., foster parent or relative appointed by court).</li> </ul>	The policy will be amended to include this language.
14.	Comment: Individual choice of device should be considered over cost effectiveness.	The Assistive Technology chosen is based on a participant's <b>assessed need</b> as identified in an Assistive Technology Assessment (if applicable) and documented their person-centered plan. The Assistive Technology must be the most cost-effective means to meet this criteria unless an explanation of why the chosen option is the most cost effective.
15.	Comment: DDA Assistive Technology should also cover the following items for qualified individuals; <ul style="list-style-type: none"> <li>a. Raised toilet seats</li> <li>b. Hand-held shower head and hoses</li> </ul>	People enrolled in a DDA-operated Waiver program have access to the Medicaid allowable items, supplies, and devices approved list based on assessed need.  Assistive Technology and Services does not include devices requiring a prescription by physicians or other licensed health care providers

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	<ul style="list-style-type: none"> <li>c. Over-the-bed tables</li> <li>d. Bed rails for home-style beds (non-hospital beds)</li> <li>e. Lift chair/armchair with elevating mechanism</li> <li>f. Reachers</li> </ul> <p>There are other items that are considered as Assistive Technology, above are just a few from that category. Medicaid approved list of covered items is below:  <a href="https://health.maryland.gov/mmcp/communitysupport/Approved%20Items%20Lists/2023/DMS.DME.OXYGEN%20Fee%20Schedule%20Eff%201.1.2023.pdf">https://health.maryland.gov/mmcp/communitysupport/Approved%20Items%20Lists/2023/DMS.DME.OXYGEN%20Fee%20Schedule%20Eff%201.1.2023.pdf</a></p>	<p>when these items are covered through other Waiver program services such as Environmental Modification and Vehicle Modifications, the Division of Rehabilitation Services, or any other State Funding Program.</p> <p>The Environmental Modifications Service includes modifications to bathrooms and kitchens for accessibility and independence with instrumental activities of daily living. This includes raised toilet seats, hand-held shower-head, and lift chairs. This service may be available to participants based on their assessed need for the service.</p> <p>An Environmental Assessment is also available. This service includes an on-site assessment with the participant at their primary residence to determine if environmental modifications or Assistive Technology may be necessary in the participant's home.</p>
16.	<p>Comment: Clarify whether or not an assessment is required for requests of \$999 or less and that \$1000 or over does require an assessment.</p>	<p>An Assistive Technology Assessment is required prior to purchase Assistive Technology when the cost is \$1,000 or greater. An Assistive Technology Assessment is not required prior to purchase Assistive Technology if the cost is less than \$1,000. A participant may request an Assistive Technology Assessment regardless of the cost.</p>
17.	<p>Comment: Recommend including that the provision that training can be:</p> <ul style="list-style-type: none"> <li>a. On-going to maintain and advance proficiency with assistive technology;</li> <li>b. provided by a range of personnel.</li> </ul>	<p>This policy specifies that the provider of Assistive Technology will provide training to the participant, their direct support staff, their caretaker(s), and their family members on the proper use and care of the device. The schedule of maintenance and training should be based on the participant's assessed need, as written in their PCP.</p>



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	Comment	DDA Response
		<p>This policy will be updated to reflect:</p> <ul style="list-style-type: none"> <li>a. Training or technical assistance for the individual and <u>their support network, including family members, direct care staff, and others;</u></li> <li>b. Program materials, and assistance in the development of adaptive materials;</li> <li>c. Repair and <u>ongoing</u> maintenance;</li> <li>d. <u>Setting up Assistive Technology;</u></li> </ul>
18.	<p>Comment: Recommend revising the below statement to reflect the need for qualified maintenance and repair services.</p> <p><i>“If specified in the approved person-centered plan, the DDA provider shall provide maintenance and repair of the Assistive Technology in accordance with the applicable specifications. (reference 10 G.2)”</i></p>	<p>This policy requires maintenance and repair of the Assistive Technology. Qualified individuals and entities must provide the maintenance and repair services.</p>
19.	<p>Comment: Recommend allowing additional funding to be requested for replacement devices should the individual break or lose their device.</p> <p>Consider: A person can be approved for a replacement device <i>once per year if new technology or changes</i> in the person’s needs require a different device.</p>	<p>The Assistive Technology policy outlines that if the Assistive Technology device needs to be removed from the participant’s home for repair, a similar Assistive Technology device that meets the participant's needs may be leased while the permanent Assistive Technology device is being repaired.</p> <p>In addition, replacement devices can be requested through the person centered planning process. In the event of an urgent need, a Revised Emergency PCP can be submitted.</p>

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	Comment	DDA Response
20.	<p>Comment: Recommend revising the sentence below to better reflect the need for qualified installation and repair:</p> <p><i>“Upon delivery of the Assistive Technology to the participant, the DDA Provider shall <b>facilitate installation of the device and ensure it is in good operating condition and repair in accordance with applicable specifications.</b>”</i></p>	<p>The DDA will change the language to state:</p> <p>Upon delivery of the Assistive Technology to the participant, the <b>provider of Assistive Technology must facilitate installation of</b> the technology and make sure it is in good operating condition and repair in accordance with applicable specifications.</p>
21.	<p>Comment: In the event that DORS does not fund, there should be funding for someone to start an at-home small business, paying for vendors like Stripe, Square, Etsy, PayPal, GoDaddy and other web hosting services, Adobe Creative Suite, other software, QuickBooks, and print houses like VistaPrint.</p>	<p>Medicaid funds may not be used to defray the expenses associated with starting up or operating a business. Funding for small business start-up is outside the scope of this Waiver service.</p>
22.	<p>Comment: Supporting health, wellness, community engagement, membership, etc. items like racing wheelchairs and adaptive exercise equipment for at home or at the gym should be considered.</p>	<p>As noted within the Exclusions section of Assistive Technology and Services policy, wheelchairs and devices requiring a prescription by physicians or other licensed health care providers are not included in this Waiver program service when these items are covered through;</p> <ol style="list-style-type: none"> <li>a. Medicaid State Plan as Durable Medical Equipment (DME);</li> <li>b. Other Waiver program services;</li> <li>c. The Division of Rehabilitation Services (DORS); and</li> <li>d. Any other State funding program</li> </ol>

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		Adaptive exercise equipment may be included based on the participant's assessed need for the adaptive device or equipment as identified within the Person Centered Plan.
23.	Comment: Much like Co-Worker Supports, consider funding technology on the job that stays at the job as an accommodation (when DORS funding is not available) as a support that works within the Employment Supports in the Waiver.	Assistive Technology devices are available based on the assessed need of the participant and are not limited to use at home.
24.	Comment: Request that DDA have the ability to waive certain requirements (need for multiple estimates, allow for preliminary non-specialist assessment) that delay the acquisition of Assistive Technology for people who need quick access to the Assistive Technology.	<p>Participants can work with their teams to submit an Emergency Revised Plan to the regional office if there is a concern about health and safety</p> <p>An Emergency Revised Plan is a PCP that is revised when a participant has an emergent request for additional services that need to be initiated within 48 hours.</p>
25.	<p>Comment: There appear to be parameters, or implied parameters when DDA is approving formerly used (refurbished, etc.) assistive technology. We believe this is because making a better investment of Waiver dollars to top condition technology is the aim.</p> <ul style="list-style-type: none"> <li>● Since the threshold of \$1,000 is in use, people may seek refurbished / used, etc. tech to avoid delays. Consider this in the service requirements or perhaps the threshold of \$1,000.</li> <li>● As a customer of SSMD points out, relatively new</li> </ul>	<p>There is no cost threshold for Assistive Technology. The cost of Assistive Technology is based on</p> <ol style="list-style-type: none"> <li>1. The assessed need of the participant; and</li> <li>2. The most cost-efficient option available that meets the needs of the participant, unless otherwise authorized by the DDA.</li> </ol> <p>The DDA proposed changing the threshold for requiring Assistive Technology Assessments from \$1,000 to \$2,500, which was</p>

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	<p>computers (or any technology) for people who wish to start their own businesses or need a computer for a remote position (not otherwise funded by DORS) should be approved. They go on to explain that it should afford not merely a chromebook but rather a useful computer with built-in accessibility software like screen readers, Dragon speech to text, and more. If there's 70K in someone's budget, a \$1,200 computer is more than reasonable and sometimes technology is the most essential accommodation needed for someone.</p>	<p>submitted in the Waiver renewal application. The DDA anticipates provisions in the Waiver renewal will be implemented on July 1, 2023. If approved, the policy will be updated.</p>
26.	<p>Comment: Consider creating a rubric/evaluation tool when a new to DDA/or not on the list professional provides assessment. In our experience, these have happened to be the most qualified in some super speciality areas. This eliminates delays.</p>	<p>The DDA will consider developing an evaluation tool to help participant's and team members identify Assistive Technology that best meets the participant's needs.</p>
27.	<p>Comment: Is there guidance in the policy on what criteria specific ATs should meet to be eligible (beyond functionality specified in section VI.A)?</p> <p>I'm particularly interested in how the privacy and data collection aspects of ATs are considered and would appreciate any feedback on that.</p>	<p>The Standards for Assistive Technology (VI.A) provides a list of Assistive Technology that is available under this service. This policy also includes a list of items that are not approved. Additionally, to get Assistive Technology through this Waiver Service the participant must have an assessed need for it.</p> <p><b>Please Note:</b> In the upcoming Waiver Renewal the DDA proposed striking the language that limits specific types of AT, making the list non-exhaustive. This will allow for flexibility based on the participant's assessed needs, as documented in their PCP.</p>

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		<p>The DDA will include language about data collection and privacy in this policy:</p> <p><i>Providers of Assistive Technology and Services must protect the privacy and security of a participant’s personal protected health information.</i></p>
28.	<p>Comment: Does the policy point to a database of eligible Assistive Technology or is there somewhere else that a database is maintained?</p>	<p>No. Assistive Technology should be based on a person’s assessed need.</p> <p>Assistive Technology resources:</p> <ul style="list-style-type: none"> <li>● <a href="#">Maryland Department of Disabilities - Assistive Technology</a></li> <li>● <a href="#">AT Process Map</a></li> <li>● The Maryland Technology Assistance Program (MDTAP) has a <a href="#">library</a> of Assistive Technology. This Assistive Technology library is a free library available to Marylanders with disabilities. <ul style="list-style-type: none"> <li>○ MDTAP hosts 9 Community Assistive TechnologyLibraries, open for consultations, device demonstrations, and device loans!</li> <li>○ AT Access Map can be used to find a Community Library, Assistive TechnologyToolkit, or Assistive Technology demo center in Maryland. (<a href="#">AT Libraries Across the State</a>)</li> </ul> </li> </ul>