

**Position Statement | FSS Family Reimbursement ADM #2022-02R**

Recent changes to the Family Support Services (FSS) program are causing hardships for vulnerable families across the state. These changes, implemented by OPWDD via Administrative Directive Memorandum (ADM #2022-02R) require our urgent attention and advocacy.

Three decades ago, the State of New York clearly expressed the importance we placed on families who support their developmentally disabled loved ones at home through the adoption of Mental Hygiene Law § 41.43. This important legislation established the Family Support Services program, and a basis for the true partnership that developed between families and OPWDD as they worked together to create and deliver supports and services in a way that was flexible, family centered, effective, and accountable.

Today, data and substantial stakeholder engagement via multiple channels demonstrate that implementation of this ADM has seriously eroded our ability to meet stated goals and statutory requirements for supporting families through FSS.

This erosion is undermining the program, and we are deeply concerned for its impact on our entire community. We are especially concerned for families who are supporting loved ones with high and complex needs, families with low or no income, and families from traditionally marginalized and underserved communities.

We are concerned that this ADM does not establish a collaborative, data driven approach to supporting families that aligns with the intent of MHY § 41.43. This creates the potential for some of New York State's most challenged families to fall through the cracks, and for significant unintended negative downstream financial and human costs to accrue across the entire OPWDD system of care.

And because FSS investment receives no Federal Financial Participation (FFP), we are concerned that current policies are being driven by a strategy focused on the reduction of OPWDD expenditures that are not accompanied by FFP. Such an approach is fraught with peril, and vulnerable families will pay the price.

We are firm in our belief that, in the midst of unrepresented housing and workforce crises, family caregivers are greatly reducing the demand on a system of more costly residential options that is currently overwhelmed. At the same time family caregivers are, without compensation, greatly reducing the demand for a paid DSP workforce that many believe is on the verge of collapse.

What we see as abundantly clear, is that we can effectively leverage the fortitude and commitment of families who support their developmentally disabled loved ones at home to mitigate the profound negative impact these crises are having on all facets of our community.

NYADD, along with many in our community, believe that properly targeted investment in family caregivers, with or without FFP, is not only the right thing to do, but it is also among the most responsible and effective investments that can be made as we work to ensure the success of both OPWDD and the people they are committed to serving.