



April 2022

California Community Living Network (CCLN)* Concern Regarding the Bureau of Labor Statistics Wage Assumptions used in Burns & Associates Independent Living Services (ILS) Rate Model (520)

CCLN is a united group of service providers, consumers, families, and members of the community at large focused on ensuring that supported and independent living remain a viable option for people with developmental disabilities. Our organization previously shared concerns regarding the Wage Assumption Occupations used in the ILS rate model. Originally, Burns & Associates evenly weighted at 25% the occupations of Home Health Aides, Psychiatric Aides, Personal Care Aides and Recreation Workers to determine the wage assumptions of an ILS Instructor. Following our concerns, Burns & Associates revised the percentages of the Wage Assumptions but not the Occupations. Therefore, we continue to assert that utilizing the Wage Assumption Occupations the Burns' study recommends inadequately funds Independent Living Services.

ILS and SLS are not the same.

The wage assumptions in the study are identical for ILS and Supported Living Services (SLS); however, the services are not the same. Although we agree the wage assumptions are an accurate description for SLS, they are inaccurate descriptions of an ILS Instructor and do not reflect the scope and complexity of the position.

In their response to the rate study, the Legislative Analyst Office (LAO) describes ILS as "a particularly important service as more consumers hope to live on their own and the state must come into compliance with HCBS rules. If a rate decrease has the effect of reducing access to, or the quality of, ILS services, this could work against the state's ultimate goals."¹

ILS is important for HCBS rules.

CCLN agrees with the LAO's assessment and notes that ILS is in compliance with the new HCBS rules. Inadequate funding will reduce access to the service as some providers will close, discontinue working with consumers who have challenges, and be selective about new consumers wanting the service. The quality of service will suffer as agencies won't be able to afford Instructors who have the skill set required for the scope and complexity of the position. Additionally, the loss of ILS, or the inability of the staff to perform the requirements of the position, has the potential to propel an individual into a crisis requiring more support from a more expensive service.

The role of an ILS instructor is comprehensive and includes the following:

- Providing input for the development of an Individual Service Plan (ISP)
- Developing lesson plans for instruction based on the ISP
- Teaching to the objectives of the ISP
- Documenting an individual's progress

¹ <https://www.ccln.org/resources/Documents/LOA%20report%20reyes-dds-050219.pdf>

- Submitting reports to the Supervisor and Case Manager
- Attending Interdisciplinary Team (IDT) meetings
- On-going assessment of changes in need
- Maintaining skill development
- Overseeing budgeting and money management of the individual
- Providing computer/technology training
- Providing crisis intervention, stabilization and prevention
- Developing emergency preparation in the event of fire, flood, pandemic, etc.
- Navigating medical systems
- Knowledge of disability and housing resources
- Understanding of, and facilitating, health care protocols from physicians
- Understanding of, and navigating through, the mental health care system
- Understanding of, and navigating through, forensic services and diversion plans
- Networking with, and navigating through, other social service agencies, i.e., Social Security, Housing Authority, In-Home-Support-Services, Medi-Cal, Programs for Women, Infants and Children (WIC), Food Stamps, Cal-Fresh, Cal-Able, etc.

More accurate Wage Assumption Occupations.

CCLN firmly asserts the following Wage Assumption Occupations, and associated percentages, are a more accurate description of the complexity and scope of the ILS Instructor position than those utilized by Burns & Associates:

Rehabilitation Counselor	30%
Social and Human Service Assistant	30%
Teachers & Instructors	40%

Additionally, below are the associated position descriptions from the Bureau of Labor Statistics:

21-1015 Rehabilitation Counselor

Rehabilitation counselors help people with physical, mental, developmental, or emotional disabilities live independently. They work with clients to overcome or manage the personal, social, or psychological effects of disabilities on employment or independent living.

21-1093 Social and Human service Assistants

Social and human service assistants provide client services, including support for families, in a wide variety of fields, such as psychology, rehabilitation, and social work. They assist other workers, such as social workers, and they help clients find benefits or community services.

25-3097 Teachers & Instructors

Definition not listed in the Bureau of Labor Statistics

Below are the Wage Assumption Occupations utilized by Burns & Associates that do not accurately capture the duties and responsibilities of an ILS Instructor. Definitions of these occupations primarily encompass personal care and providing recreational opportunities.

31-1011 Home Health Aides

Provide routine individualized healthcare such as changing bandages and dressing wounds, and applying topical medications to the elderly, convalescents, or persons with disabilities at the patient's home or in a care facility. Monitor or report changes in health status. May also provide personal care such as bathing, dressing, and grooming of patient.

31-1013 Psychiatric Aides

Assist mentally impaired or emotionally disturbed patients, working under direction of nursing and medical staff. May assist with daily living activities, lead patients in educational and recreational activities, or accompany patients to and from examinations and treatments. May restrain violent patients. Includes psychiatric orderlies.

39-9021 Personal Care Aides

Assist the elderly, convalescents, or persons with disabilities with daily living activities at the person's home or in a care facility. Duties performed at a place of residence may include keeping house (making beds, doing laundry, washing dishes) and preparing meals. May provide assistance at non-residential care facilities. May advise families, the elderly, convalescents, and persons with disabilities regarding such things as nutrition, cleanliness, and household activities.

39-9032 Recreation Workers

Conduct recreation activities with groups in public, private, or volunteer agencies or recreation facilities. Organize and promote activities, such as arts and crafts, sports, games, music, dramatics, social recreation, camping, and hobbies, taking into account the needs and interests of individual members.

Conclusion

We appreciate your attention to this important issue and are eager to provide follow-up information as necessary. CCLN believes these changes to the Wage Assumption Occupations will safeguard the delivery of this vital service for Californians with developmental disabilities and protect the state from adverse fiscal and policy implications.

Sincerely,

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