



**To:** [Medicaid.Capwaiver.Publiccomment@dhhs.nc.gov](mailto:Medicaid.Capwaiver.Publiccomment@dhhs.nc.gov)

**From:** Mary Bethel, <sup>Mary Bethel</sup> President of the NC COA Board of Directors and Trish Farnham, <sup>Trish Farnham</sup> Project Lead for NC COA's direct care/support workforce initiatives

**Re:** NC COA's Comments on CAP DA Waiver Renewal

**Date:** September 26, 2024

Thank you for the opportunity to provide brief comments on NC Medicaid's CAP DA waiver renewal.

The North Carolina Coalition on Aging (NC COA) is a 501(c)(3) organization that works to improve the quality of life for older adults in North Carolina through collective advocacy, education, and public policy work. We have a broad-based membership of advocacy organizations, service providers, trade associations, people who rely on services and family caregivers.

We fully support NC Medicaid's efforts to effectively meet the higher acuity needs of older adults and individuals with disabilities on the CAP DA waiver. Doing so builds our state's capacity to support individuals to **remain in** and **return to** their own homes and communities. We also applaud NC Medicaid for developing a fee structure that supports the CNA Level II service. This is both responsive to the acuity trends in our LTSS population and reflects a policy commitment to support them effectively.

We also recognize that a CAP DA recipient's acuity level may increase over time, creating potential care disruption as the individual requires support from aides with additional clinical skillsets. We strongly encourage NC Medicaid's continued work with the NC Division of Health Services Regulation (DHSR) and the NC Board of Nursing to create training pathways that enable a direct care worker **to remain with** a person as the person's needs increase while also building the competencies necessary to support the person appropriately. Such continuity is essential to person-centered care.

We also encourage efforts to build and expand the capacity of the existing CAP DA provider network to better meet this current and growing need.

Thank you for considering these comments and for your commitment to supporting NC's LTSS community.