

Purposed Waiver Amendments for Jan 1, 2026

Public Comment Response

# of Comments	Topic	Comment Summary	HHS Response
2	Face to face contact with the case manager at least every other month	Requirement that individuals with an intellectual disability or a developmental disability have face to face contact with the case manager at least every other month.	The waiver amendment will proceed as written. This change is consistent with HHS's agreement with our federal partners and the MCO contractual obligations.
10	ISB Optional	<p>Requesting to maintain the Individual Support Broker (ISB) as mandatory instead of optional for Consumer Choices Option (CCO).</p> <p>Identifying that case managers (CM) role in development and oversight of the CCO budget as a conflict of interest.</p> <p>Worries about lack of CM competency related to CCO.</p>	<p>The waiver amendment will proceed as written.</p> <p>This change is consistent with the philosophy of self-direction. Today, CM play an important role in assisting waiver members in managing their waiver expenditures.</p> <p>HHS continues to develop tools and resources for CMs assisting participants with self-direction.</p>
4	Single Assessor	Delays for completion of initial assessments and annual reassessments.	The waiver amendment will proceed as written. HHS is actively working with the Core Standardized Assessment vendor on timely completion of assessments.

2	Individual Consumer Directed Attendant Care (ICDAC) transition to agency Attendant Care or self-directed personal care.	Wants us to retain the ICDAC provider type due to concern over the loss of wages due to transition to an agency.	<p>The waiver amendment will proceed as written.</p> <p>Current ICDAC providers may choose to apply for employment with a CDAC agency or as an employee for an HCBS participant using self-directed personal care.</p> <p>For more information, please visit here.</p>
2	Exception to Policy (ETP) to Waiver of Iowa Administrative Rules (WoAR)	Expressing concern that the term WoAR has negative connotation and would like the department to reconsider.	The waiver amendment will proceed as written, this language is consistent with Iowa Administrative Code 441 Chapter 7 as implemented March 26, 2025.
72	Supported Community Living (SCL)	<p>Lack of transparency for the update to the administrative code.</p> <p>Revisions to both BI and ID Waiver SCL for the number of SCL 15-minute units that are available per day to 7.75 hours or 31 15 minute units per day or 11,315 15-minute units per state fiscal year except a leap year, when 11,346 to align with the daily unit of service definition of 8 or more hours per day,</p>	<p>Under ID and BI waiver, a reference to the administrative code reads: 441.77.79(1), this is an error, and has been updated to the correct citation of 441.79.1(2)</p> <p>This change will proceed and written.</p>

			<p>The change to the 15-minute units available will not change at this time. HHS will continue to explore alternative reimbursement methodologies for future implementation.</p>
14	Other Comments	<p>HHS received comments that ranged from our current HOME project, the topic of “natural supports” and other topics unrelated to the amendments.</p>	<p>All HOME comments should be submitted at the time that the HOME waivers are published for public comment.</p> <p>CMS requires that service plans identify both paid and unpaid supports. “Natural Supports” is defined in federal regulation at 42 CFR 441.301(c)(2)(v) (v) : Reflect the services and supports (paid and unpaid) that will assist the individual to achieve identified goals, and the providers of those services and supports, including natural supports. Natural supports are unpaid supports that are provided voluntarily to the individual in lieu of 1915(c) HCBS waiver services and supports.</p>