



LETTER OF TRANSMITTAL

Critical Concerns Regarding Conflict of Interest Issues in the Colorado Developmental Disabilities Delivery System

July 1, 2013

The document attached, Critical Concerns Regarding Conflict of Interest Issues in the Colorado Developmental Disabilities Delivery System (DDD), is being sent to the following via attached email and/or USPS:

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Critical Concerns Regarding Conflict of Interest Issues in the Colorado Developmental Disabilities Delivery System

July 1, 2013

Parents of Adults with Disabilities in Colorado (PAD-CO) and the Colorado Cross Disability Coalition (CCDC) bring to your attention critical concerns regarding conflict of interest (COI) issues in the Colorado Developmental Disabilities Delivery System (DDD), specifically with the Community Centered Boards (CCB) component.

During the past 10 years or so, tremendous concerns (audits, reports, recommendations) have been brought to bear upon the DDD system by the Centers for Medicare & Medicaid Services (CMS) in regards to the conflict of interest inherent in the CCBs being both the case management agency and the service agency, all in the same business. This has resulted in the CCBs attempting to circumvent the desperate need for entirely legally separated agencies for case management and service delivery.

Specifically, in the case of the CCB Developmental Pathways, Inc., a separate legal subsidiary of Developmental Pathways, Inc., called Continuum of Colorado, Inc. was formed May 5, 2012, to provide services. Interestingly, the incorporation papers allow only one voting member, Developmental Pathways, Inc., and the three Board members are the Executive Director of Developmental Pathways (DP), Melanie Worley, the CFO of DP, Lloyd Sweet, and the Operations Officer of DP, Matt Van Auken.

We find it hard to fathom how an organization owned by another corporation, and directed by the Executive Officers of the other corporation, can be considered a separate entity for proper separation of case management from service delivery.

Further compounding the situation is continued and increased COI in that it has been reported that some case managers from Developmental Pathways, Inc., are directing, and have been trained to direct, clients to only services provided by Continuum, Inc. If true, this seems a terrible abuse of the system, and a violation of the ethics and procedures of case management.

Specifically, PAD-CO has received the following statements from parents and families (which I hold in utmost confidence:)

I told her that I was VERY uncomfortable with the pressure to use Continuum but she said **they are trained to suggest these "in house" options.**

When I applied for the Family Support Money at DP . . . they steered me toward the use of Continuum for respite. I said I already had preferred respite, **and they said they are told to suggest it.**

[Three different families] applied for Community Outreach monies (also DP) for adults on waitlist, **and they were steered toward the DP "Pre Vocational training"** rather than other community based programs that are more integrated.

It was very creepy how all **these families reported the push to Continuum, each from different coordinators so it is for sure a wide spread issues.**

We were offered money from DP to use on services. We were recommended use Continuum which I had never heard of

I felt initially that our only choice was Continuum and was frustrated so I persevered until I got outside therapies but **I did feel and do have correspondence to show that Continuum was the only action I could take.**

. . . 2 families who applied for family support money **for Non Continuum service providers** and were not funded not ever informed of no funding or reason... **Just never heard after requesting...**

.[A] parent was given a list of PASAs to contact in order to start services for her child. It turns out that none of the PASAs **except** Continuum . . . provided the service

[The case manager] stated directly that she had been instructed by management that the process would be to offer services provided by Continuum first to all DP clients. If Continuum was unable to provide services to DP clients, then the service request would be opened to outside PASAs [Program Approved Service Agencies].

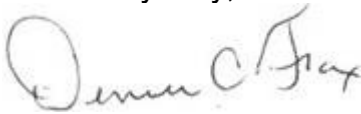
It has also been reported to us that this situation has been brought to the attention of DDD and HCPF within the past year, and no formal action was taken.

From the above input it appears that, in the apparent effort to avoid COI, DP has created even more conflict of interest.

The question remains - what is the motive of DP to attempt to move business and clients to Continuum, Inc., for services? It strikes us that Continuum may be struggling financially, as it has been reported that scores of parents and service providers have moved their financial association from Continuum, Inc., to Rocky Mountain Human Services, Inc. (another CCB). The financial viability of Continuum is then another critical question.

PAD-CO and CCDC formally request an investigation by the proper authorities into the matters discussed above, including the current financial status and viability of Continuum, Inc.. As we are not quite sure who the "proper authorities" are - due to legislated organizational changes in process - we are sending this letter to a number of said authorities.

Yours very truly,



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Moderator, PAD-CO
Pure Advocacy • No Compromise • Empowered Parents

/s/Julie Reiskin
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