March 17, 2020

Congressman Joe Courtney
2332 Rayburn House Office Building
Washington, D.C. 20515

Dear Congressman Courtney,

The Alliance is the statewide association of community nonprofits. Community nonprofits provide essential services in every city and town in Connecticut, serving more than half a million people in need and employing 117,000 people across the State. They are an important part of what makes Connecticut a great place to live and work and an important piece of our economy.

We are writing to ask for your support for nonprofits in the response of the state and federal government to the Coronavirus pandemic. The spread of the illness poses a number of serious and significant problems for the public health of the half million vulnerable people served by community nonprofits across Connecticut and the 117,000 employees serving them.

Community nonprofits provide essential services in every city and town in Connecticut, serving people in need. They:

- Are at the front lines of the opioid crisis;
- Help people return to their communities from prison;
- Support people with developmental disabilities;
- Shelter and feed families in need;
- Enrich communities with cultural and artistic programs; and more.

The Alliance conducted a survey of our members to identify issues nonprofits are experiencing as they strive to fulfill their missions in the midst of the pandemic. Our recommendations for how nonprofits can be better supported are below – many of which require immediate action by the federal government.

The challenges we are facing are unprecedented, and we recognize the stresses it places on government, the economy and society as a whole. But unless the federal government can respond to the needs of community nonprofits that serve vulnerable people, programs may close and the human toll could increase and last after the crisis is passed.

FINANCIAL STRESS COULD CLOSE COMMUNITY-BASED PROGRAMS – PERMANENTLY

If programs must close for weeks at a time, providers of children’s services, adult behavioral health and those who support people with intellectual/developmental disabilities will not financially survive. Without support, this could severely damage the state’s networks of care and leave thousands of people without services for the foreseeable future.
Providers will need emergency funding to keep afloat. Fee-for-service providers get paid for the clients they see. If they don’t see people, they don’t get paid. DDS providers with day programs get paid based on those in attendance.

**Recommendations:**

- **Congress should appropriate emergency funding for community nonprofits to survive through this crisis.**

- Medicaid’s strict reporting, verification and audit requirements should be relaxed.

- Congress should increase the FMAP for state Medicaid programs. CMS should adjust rate methodologies as a way to increase the flow of funding to providers.

- CMS should be authorized to provide grants to home and community-based services providers, community-based behavioral health providers, and other nonprofits who provide services to Connecticut’s Medicaid recipients.

- While we appreciate CMS’ guidance has so far focused on hospitals and nursing homes, CMS should release guidance specific to clinical behavioral health services and home and community-based services.

- Ease strict regulations on services such as Methadone Maintenance Treatment to allow people to continue to receive life-saving treatment without necessitating in-person visits.

**STAFFING**

Shortage of staff, quarantines and fear of infection will make it difficult to see clients in the community and in-home services. If clients on medication cannot have access to their psychiatrist, for example, they are not able to refill their current medications, many of which are life-saving. Further, some programs require providers to maintain staffing ratios, but with existing vacancies, people not able to get to work and a cumbersome hiring process these may be impossible to meet.

**Recommendations:**

- The federal government should direct states to allow emergency flexibility for staffing, and individual and facility licensure, and make rules to allow for more rapid hiring of staff to fill in gaps.

- Staff of nonprofit community providers should be prioritized for testing as healthcare workers.

- Medicaid should ease requirements around fidelity to evidence-based programs to account for the possibility of staffing shortages effecting program fidelity.
SUPPLIES

There is a shortage of PPE (Personal Protective Equipment): gloves, gowns, shoe covers, head covers, masks, respirators, eye protection, face shields, sanitizer and goggles. A lack of these items could put medically fragile people at risk. There is also a need for cleaning supplies, and for cleaning professionals with specialized training for agency vehicles, adaptive equipment. As has been widely reported, there is also a shortage of testing kits.

Recommendation:

- The federal government should provide necessary PPE, cleaning supplies and testing kits for community nonprofits.

DEALING WITH INFECTION

Providers will encounter people they serve who are identified or presumed to be infected and need care, as well as those who need to be quarantined. This is a particular concern for residential programs. For example, one provider serves several hundred clients who are making the transition back to their communities from prison. If those facilities shut down, the Department of Correction would need to bring them back to prison or release them into the community because the provider would have no place at which they could live.

Providers also need to know what to do with people served who test positive or exhibit symptoms – will they be placed in a hospital or another setting? If their places of residence are placed under quarantine it would exacerbate burdens (such as staffing burdens and protections) for providers.

Recommendation

- Medicaid should immediately begin reimbursing for:
  - Staff to accompany clients to hospitals;
  - Room and board costs if temporarily moving a resident for a quarantine is required.

We appreciate your consideration and support. We and our nonprofit members are available to meet remotely and provide more information. Please contact me at gcasa@ctnonprofitalliance.org.

Sincerely,

Gian-Carl Casa
President and CEO