



[www.nmdunited.org](http://www.nmdunited.org)

11900 Metric Blvd.  
Suite J #121  
Austin, Texas 78758

October 25, 2018

**Board of Directors**

*President*

**Emily Wolinsky**

Austin, TX

*Vice President &  
Interim Treasurer*

**T.K. Small**

Brooklyn, NY

*Secretary*

**Kendra Scalia**

Newburgh, NY

**Dan Darkow**

Oxford, OH

**Andraea LaVant**

Hyattsville, MD

**Brooklyn Marx**

Ontario, Canada

**Maria Sotnikova**

Atlanta, GA

**Jason Tweed**

Northumberland, PA

The Honorable Seema Verma  
Centers for Medicare and Medicaid Services  
U.S. Department of Health and Human Services

*Sent via: [EVV@cms.hhs.gov](mailto:EVV@cms.hhs.gov)*

**Re: November 7 Stakeholder Call Feedback**

Dear Administrator Verma:

NMD United, Inc. is an established 501(c)3 organization composed of adults living with neuromuscular disabilities. We are a peer-led organization dedicated to increasing self-direction while promoting independence among our members. NMD United represents nearly 2,000 individual members all living with neuromuscular disabilities.

We write to express our **overwhelming support of the National Council on Independent Living (NCIL) Electronic Visit Verification (EVV) Principles and Goals** statement published earlier this month.

Most of our membership are consumers of home health care and personal care services. These crucial home and community-based services provide independence and dignity to millions of disabled Americans. All states offer some form of consumer-directed personal care services, a program that gives preference to consumer choice in regard to who they hire, how they train personal assistants (PA's), and when those PA's are scheduled to work. In each of these programs, **the consumer is the employer and direct supervisor.**

Electronic visit verification has no place in consumer-directed services. We are asking CMS to issue guidance to states that prioritizes consumer voices over those in the EVV industry. That is, **CMS ought to ban the use of geo-location services and biometric data collection; CMS ought to recommend the use of web-based timesheets, which offer flexibility to and maintain supervisory rights of the consumer.** The consumer as the employer has full rights to sign-off and verify shifts completed by their employees.

Requirements to use EVV erode consumer-directed services and eliminates independent living rights the disability community has fought hard to win over several generations. We encourage CMS to develop EVV standards alongside the disability community and to support the independent living movement.

Sincerely,

A handwritten signature in black ink, appearing to read "EWolinsky".

Emily Wolinsky

*President, NMD United, Inc.*