March 16, 2026

To: Governor Walz, Senators Hoffman and Abeler, and Representatives Schomacker and Noor
From: Advisory Task Force on Waiver Reimagine
Re: Advisory Task Force Recommendation for Implementation Pause of Waiver Reimagine

Dear Governor Walz, Senators Hoffman and Abeler, and Representatives Schomacker and Noor,

The Minnesota Legislature, during the 2025 special session, established the Advisory Task Force on Waiver Reimagine (2025 Laws of MN, 1st Special Session, Chapter 9, Article 2, Sec. 29 [256B.4907]). In this statute, the task force is directed to make findings and recommendations related to Waiver Reimagine, with a report due no later than January 15, 2027. Given that the report submission deadline falls after the scheduled Waiver Reimagine go-live date of January 1, 2027, the Task Force members have agreed to take prompt action. Please accept this letter as our first step in fulfilling our duties as the Advisory Task Force on Waiver Reimagine.

Our recommendation:

We recommend a delay in the launch of Waiver Reimagine of up to 36 months to address salient concerns associated with program integrity, compliance, stakeholder/system readiness, and fiscal responsibility.

Our recommendation is aligned with the expressed intentions of Waiver Reimagine: increased choice and control over planning services and supports, equitable access to services and funding across waiver programs, and increased options to self-direct services. While members of the Task Force represent diverse perspectives and do not agree on every policy detail, there is strong agreement that the risks of the current implementation timeline outweigh the benefits.

Our Concerns:

1. Program Integrity and Compliance Risks

MnCHOICES 2.0 is intended to serve as the assessment tool informing waiver eligibility and associated service categories (individual budget ranges). As a person-centered, qualitative assessment instrument, its reliability and validity are essential to ensuring equitable outcomes and mitigating assessor bias. This was noted in the 2021 Legislative report (p.51): "Since the budgets are dependent on the assessment, it is imperative that the final assessment undergoes analytical testing, and that thorough and consistent assessor training is developed and implemented."

Reliability and validity testing have not occurred. Left untested, Task Force members anticipate an increase in assessment appeals, which take time and resources to address and

would potentially mitigate intended efficiency gains of a new wavier system. For an assessment tool that will drive eligibility and budget determinations statewide, independent validation is a necessary safeguard to protect against unintended inequity and legal challenge.

2. System Compliance and Readiness Concerns

Given federal person-centered planning requirements and Minnesota's longstanding commitment to community integration, the State must be confident that budget methodologies do not inadvertently constrain informed choice or produce forced steering toward more restrictive settings. While this is not the intention of the redesign, the lack of an adequate vetting process raises stakeholder concerns and risks delays, due to federal findings of non-compliance.

Closer to the ground, stakeholders, from individuals to providers, will not have projected budgets in time to adequately prepare for the system changes, assuming the services or staff required are available. A transition of the scale of Waiver Reimagine requires predictable timelines, comprehensive understanding, and adequate preparation, conditions which are not achievable in the remaining time.

The state must be prepared for cost of corrective action.

3. Fiscal Exposure and Instability

Waiver Reimagine sits at the nexus of other significant programmatic and budget reduction efforts including the cost containment mandates associated with long-term services and supports (LTSS), DHS fraud mitigation and program integrity processes, provider licensing moratoriums, and the federal Medicaid budget and policy changes.

Minnesota waiver stakeholders know the administrative and fiscal consequences of implementation breakdowns. Most top of mind are experiences associated with the introduction of MnCHOICES 2.0, centralization associated with Disability Waiver Rate System (DWRS), and the rollout of the Community First Services and Supports (CFSS) program.

Without fully integrating the lessons of the past, the cost of corrective action risks eroding projected near-term savings. The implementation of Waiver Reimagine is on track for increased costs associated with:

- Noncompliance with Centers for Medicare and Medicaid Services rules
- Olmstead-related litigation
- County administrative rework costs
- Responding to gaps to assure continuity of care

Waiver Reimagine is one of the most consequential structural changes to Minnesota's disability services system in decades. Implemented thoughtfully, it can advance equity and sustainability. Implemented prematurely, it risks preventable instability, increased costs, and erosion of public trust. A strategic pause now protects legislative intent, program integrity,

and long-term fiscal stewardship. We urge you to adjust the implementation timeline to ensure this reform succeeds the first time.

The Advisory Task Force on Waiver Reimagine is working productively and is eager to continue its work in collaboration with the Department of Human Services and legislative leadership to advance reform that is durable, compliant, fiscally responsible and aligned with the best practices of human service policy development and service delivery.

Respectfully yours on behalf of the Advisory Task Force on Waiver Reimagine,

Dr. Katrina Jirik
Co-Chair, Waiver Reimagine
Advisory Task Force

Linda Wolford
Co-Chair, Waiver Reimagine
Advisory Task Force

Cc:
Dana Montgomery, Chief of Staff for Cabinet Affairs and Operations, MN Governor's Office
Sam Parmekar, DFL Senate Committee Administrator
Senator Jordan Rasmusson, Waiver Reimagine Advisory Task Force Member
Senator Zaynab Mohamed, Waiver Reimagine Advisory Task Force Member
Representative Brion Curran, Waiver Reimagine Advisory Task Force Member