



August 20, 2014

Patrick Keating  
Department of Public Welfare  
Office of Developmental Programs  
P.O. Box 2675  
Harrisburg, PA

Dear Mr. Keating:

This letter is in regards to Objective 1 of the Futures Planning process and is submitted on behalf of the Pennsylvania Association of County Administrators of Mental Health and Developmental Services (PACA MH/DS), which represents the county mental health/intellectual disability program administrators for all 48 counties/joiners, as well as behavioral HealthChoices oversight entities and both county and private supports coordination organizations for intellectual disability services.

In 2012 PACA MH/DS reviewed various federally approved waivers for individuals with intellectual disability and various assessments used during their planning process. The Supports Intensity Scale (SIS) is the most commonly used assessment and the only assessment used to allocate resources to individuals with intellectual disability. There are states that have developed their own assessment or use the Inventory for Client and Agency Planning (ICAP) in conjunction with or in lieu of the SIS.

PACA MH/DS supports utilizing a statewide assessment in a person-centered planning process to identify an individual's needs and inform decisions about resources that will address those needs. PACA MH/DS believes the SIS is a viable tool for individual and systemic planning in Pennsylvania. The commonwealth has a significant body of data from implementing the SIS which needs to be much more effectively utilized. Even if the SIS is not the tool that is ultimately selected, we strongly support incorporating the statewide assessment into the ISP team planning process.

PACA MH/DS has discovered legitimate concerns regarding the implementation of SIS by various stakeholders. The approach to the SIS has been disjointed and is not family-friendly. The current information gathered is not used for individual or system planning while taking valuable time from the individuals participating in the process. These facts create a poor perception of the SIS that will need to be addressed for any assessment instrument to be accepted and put to use. A decision by a previous administration to not share SIS scores when the tool was implemented in 2008 has resulted in the SIS having no meaning beyond meeting a federal waiver requirement for a statewide, standardized assessment.

The objective work group noted the need for a SIS pilot to explore the viability of the SIS for resource allocation. PACA MH/DS worked with ODP to get a pilot implemented which involved six counties of varying size and demographics. Those counties were provided SIS scores for individuals in their counties, and the counties reviewed the data to address the following core questions:

- Are needs met and resources equitably distributed?
- Can the SIS strengthen the correlation between needs and services authorized?
- Can the SIS assist in simplifying the planning and ISP processes?
- Can the SIS be used to develop budget projections for consumer needs either individually or in aggregate?
- What is the relationship of natural supports and the ISP?
- Does current business practice support resource allocation based on the SIS?

The six counties' analysis showed that the SIS score has a strong correlation with the amount of services and supports an individual needs in most cases. Although the initial pilot only began to explore the various questions, this supports the idea that the SIS could be used in a person-centered planning process to inform the ISP team of an individual's support needs. Future research could focus on factors that are measured by the SIS which tend to point to higher needs, as well as those factors which are not measured by the SIS (including natural supports) that also impact an individual's support needs. Pennsylvania also needs to consider what additional tools exist or need to be created and layered with the SIS to produce a result that accurately reflects need. PACA MH/DS believes it is also important to engage families in improving the way in which the assessment is administered and creating a viable allocation methodology.

PACA MH/DS supports the use of an assessment to allocate resources, and recommends ODP:

- Create a communications strategy to engage all stakeholders in discussions regarding current and future SIS implementation and utility
- Adapt current practices to be family friendly in SIS implementation
- Use research from the numerous other states that implement SIS-driven allocation
- Expand the pilot to more counties in the process of defining and refining individual resource allocation approach
- Secure technical assistance from Human Services Research Institute who assisted other states

If PACA MH/DS can be of assistance, please contact Deb Neifert at [dneifert@pacounties.org](mailto:dneifert@pacounties.org) or by calling (717) 526-1010 extension 3119.

Sincerely,



Executive Director

**- Assessments -**  
(2012)

**A National Snapshot in Planning for Intellectual Disability Services**

**States with Universal Assessment** (*Black and Leitch*)

Twenty two (22) states indicate they use a universal assessment tool for long-term care. Most national assessment tools are population specific (such as the Supports Intensity Scale for individuals with intellectual disability), while other tools can be applied across populations. Numerous states are developing their own universal (statewide) assessment tool to bridge across a variety of populations.

**National Uniform Assessment Tools** (*Black and Leitch*)

The approach to a statewide uniform assessment tool varies. Although some states develop their own assessment tool, the following is a list of current national uniform assessment tools.

**Minimum Data Set (MDS)**

The MDS is a Centers for Medicare and Medicaid Services (CMS) mandated assessment of all residents in Medicare or Medicaid certified nursing homes, assessing each individual's functional capabilities, and helping nursing home staff to identify health problems.

**Minimum Data Set-Home Care (MDS-HC)**: The MDS-HC is a validated assessment tool created by interRAI Corporation that was modeled after the MDS. It was developed to assist agencies in identifying the needs, preferences, and strengths of elderly clients living in the community, although it may also be used for adults with disabilities. Several states are using this instrument for HCBS services.

**Inventory for Client and Agency Planning (ICAP)**: The ICAP is a standardized assessment instrument that measures adaptive and maladaptive behavior. It can be used for both children and adults.

**Continuity Assessment Record and Evaluation (CARE)**: The CARE Tool was designed for implementation with Medicare populations, primarily those who are aging and /or have physical disabilities. It was developed for use in acute and post-acute-care (PAC) settings participating in the PAC Payment Reform Demonstration.

**Outcome and Assessment Information Set (OASIS)**: The OASIS tool collects data that can be gathered across home health agencies in a standardized manner, to improve the quality of services using outcomes-based quality improvement methods.

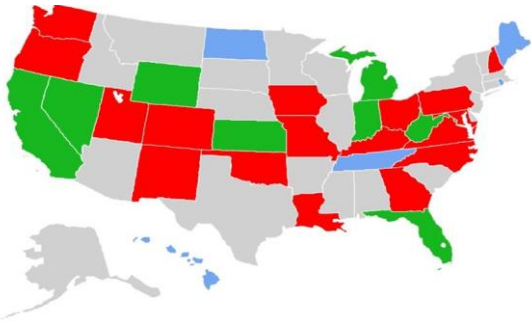
**Supports Intensity Scale (SIS)** - The SIS is a validated and normed tool developed by the American Association on Intellectual and Developmental Disabilities. The tool is designed for use with adults (16 and over) with developmental disabilities.

**SIS Implementation**

The SIS was published in 2004 by the American Association on Intellectual and Developmental Disabilities to measure support requirements in 85 daily living, medical and behavioral areas. The SIS is becoming a critical tool in budgeting through either provider or individual allocation processes.

*The SIS does not create a level of care criteria as needed for ICF eligibility, a waiver requirement.*

Red is SIS implementation



Green is for SIS implementation as allocation process.  
Blue is planning to move to SIS for allocation process.

<http://aaid.org/sis/sisonline/states-using-sis>

| <b>SIS In Use STATEWIDE*</b> | <b>Use *</b>                  | <b>Applied to Allocation *</b> | <b>Planning/Exploring to Apply to Allocation</b> |
|------------------------------|-------------------------------|--------------------------------|--|
| Arizona                      |                               |                                | Yes – individual                                 |
| California                   | County or provider            |                                |  |
| Connecticut                  |                               |                                | Yes – individual                                 |
| Colorado*                    | Statewide                     | Yes - individual               |  |
| D.C.                         | Statewide                     |                                | Yes – individual                                 |
| Florida                      | County or provider            |                                | Yes – individual                                 |
| Georgia*                     | Statewide                     | Yes - individual               |  |
| Hawaii                       | Under statewide consideration |                                |  |
| Indiana                      | County or provider            |                                | Yes – individual                                 |
| Iowa                         | Statewide                     |                                |  |
| Kentucky                     | Statewide                     |                                | Yes - individual                                 |
| Louisiana*                   | Statewide                     | Yes - individual               |  |
| Maine                        | Consideration to go statewide | Yes - 2013                     | Yes - individual                                 |
| Maryland                     | Statewide                     |                                | Yes - individual                                 |
| Michigan                     | County or provider            |                                |  |
| Missouri*                    | Statewide                     |                                | Yes - individual                                 |
| Mississippi                  |                               |                                | Yes - individual                                 |
| Nevada                       | Statewide                     |                                |  |
| New Hampshire                | Statewide                     | Yes                            | Yes - individual                                 |
| New Jersey                   |                               |                                | Yes - individual                                 |

|                |                               |                  |                                   |
|----------------|-------------------------------|------------------|-----------------------------------|
| New York       |                               |                  | Yes - individual                  |
| New Mexico     | Statewide                     | Yes 2013         | Yes - individual                  |
| North Carolina | Statewide                     | Yes - individual |                                   |
| North Dakota   | Consideration to go statewide |                  | Yes - individual                  |
| Ohio           | Statewide                     |                  |                                   |
| Oklahoma       | Statewide                     |                  |                                   |
| Oregon*        | Statewide                     | Yes - individual |                                   |
| Pennsylvania   | Statewide                     |                  | Yes - individual                  |
| Rhode Island   | Statewide                     |                  | Yes - individual                  |
| South Dakota   |                               |                  | Yes - individual                  |
| Tennessee      | Consideration to go statewide |                  |                                   |
| Utah           | Statewide                     | Yes              | Yes - individual                  |
| Washington     | Statewide                     | Yes - individual |                                   |
| West Virginia  | County or provider            |                  |                                   |
| Virginia       | Statewide                     |                  | Yes - individual                  |
| Wyoming        |                               |                  | Yes - individual<br>Replace DOORS |

*HSRI gap analysis is occurring in Illinois, Texas, Pennsylvania and Florida regarding SIS allocation potential.*

### **SIS Assessment Application for Allocation (AAIDD White Papers)**

Applying the SIS for allocation purposes is an interactive process between two facets: prospective budget and service payments. Sound budgeting approach for individual services requires sound provider rates and vice versa. Consequently, when the SIS is used for allocation purposes, both facets are a consideration in creating a viable approach.

#### Prospective Budget

SIS is used to assign prospective budget amount or service level (an allocation) to an individual commensurate to individuals with similar needs

#### Service Payments

SIS is used to allocate a standardized provider rates for discrete type of service.

