



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF HUMAN SERVICES
November 3, 2023

Dear Association Executives:

I am writing in follow-up from your joint April 10, 2023 letter outlining concerns with the Supports Intensity Scale (SIS).

As I stated in my May 25, 2023 letter to the associations, ODP commissioned the American Association on Intellectual and Developmental Disabilities (AAIDD) to audit ODP's SIS assessment vendor for fidelity of application of the SIS. This letter is to provide you with a summary of results from the AAIDD audit and an update on actions ODP has underway related to the implementation of the SIS assessment.

AAIDD has concluded the requested audit and provided the Office of Developmental Programs (ODP) with recommendations based on their findings. ODP committed in the May 25, 2023 letter to the associations that if the audit conducted by AAIDD reveals issues with fidelity in application of the SIS assessment, ODP will determine the appropriate steps to remediate the issue(s) based on the findings.

The audit did not find fidelity issues in the application of the SIS assessment but did find a number of areas that contributed to the concerns outlined in the associations' letter. I have included at the end of this letter ODP's planned action steps in response to the audit.

Please note that the commonwealth's contract with AAIDD has since the implementation of SIS in Pennsylvania included a requirement for systematic and routine assessor fidelity evaluations. SIS-A Assessors are trained by AAIDD Qualified Trainers and receive quarterly Interviewer Reliability and Qualifications Reviews. The audit was a supplementary evaluation ODP requested.

Audit Procedure

AAIDD reviewed a total of 25 assessments. The assessments reviewed had (1) been submitted for *SIS Family Friendly Report Content Discrepancy Review* or (2) were for individuals whose Needs Group (NG) dropped by 2 or more NGs from the prior SIS assessment. This audit was not conducted through a random representative sample review. Record reviews included evaluating each assessment against four quality indicators: supporting documentation, reasonableness of ratings for sections 1A & 1B (exceptional medical and behavioral support needs), reasonableness of ratings for sections 2 (support needs index) & 3 (supplemental protection & advocacy), and impressions of reliability.

AAIDD provided the below impressions and recommendations as a result of the audit.

AAIDD's Impressions

Four tendencies were prevalent among the record reviews. In addition to stating the trend, the evaluators suggest explanations for the ODP team to consider when determining a course of action.

1. *Supporting documents provide conflicting or incompatible information to the SIS-A ratings and/or narratives.*

Information provided on supporting documents, often in addition to the Request for SIS-A Family Friendly Review¹ form, included information incongruent with SIS-A ratings and narratives. This information, provided after the interview and completion of the SIS-A assessment, is part of the ODP review process. Any information provided after the interview may not have been considered at the time of the assessment.

SIS-A interviewers are trained to ask every item and query the rationale for ratings for any discrepancies. The interviewer relies on the respondents to provide accurate knowledge of the individual being assessed based on their experience and understanding of the individual's specific support needs. Of the 25 reviews, only one review request mentioned concern about the interviewer's SIS-A administration. From the available information, it appears that the assessments which did not meet the review standards may be indicative of the respondents' lack of disclosure of all pertinent information about the individual during the assessment, rather than interviewer inaccuracies (error).

2. *Score differences from the previous SIS-A, most often in Section 1: Exceptional Medical and Behavioral Support Needs*

It is highly possible to infer an individual's support needs may change over time due to varying factors. In the absence of a specific life event that significantly alters an individual's support needs, AAIDD recommends assessments occur every 3-5 years.

Another possible reason may include differences in how this section has been conducted over time and across interviewers. It might be helpful to review if the PA ConSistency Guide, put into practice in 2019 to provide structure and continuity among SIS-A Interviewers, had an impact on score differences.

It was common to see little to no narrative on previous SIS-A assessments whereas comprehensive narratives on the most current SIS-A assessments. In most cases, the narratives aided in substantiating ratings. Beneficial narrative techniques included descriptions of the medical condition or behaviors, examples of supports, and the frequency and duration of support needs for selected ratings.

3. *Review requests include unsubstantiated and/or irrelevant information.*

It was difficult for the evaluators to ascertain from the descriptions provided on the Request for SIS-A Family Friendly Review form plausible justification to substantiate a change to ratings. This was most often the case for concerns raised about items in Section 2: Support Needs Index. Requestors' descriptions provided on the Request for SIS-A Family Friendly Review form also included information most often not in line with the intent nor relevant to addressing the support needs for items.

4. *Review requests focus on needs level/needs group adjustments rather than concerns with SIS-A ratings.*

Requests related to needs level/needs group adjustments were mingled with disagreements with SIS-A ratings. This combination may infer that requestors have a misconception that the SIS-A directly determines needs level/needs group assignments.

¹ Note, AAIDD has incorrectly identified the "SIS Family Friendly Report Content Discrepancy Review Request Form" as the "Request for SIS-A Family Friendly Review" throughout the audit summary. The revised electronic form that ODP will be releasing is called the "SIS-A Discrepancy Review Form."

AAIDD's Recommendations

Based on the record reviews summarized in this report, the following are recommendations to consider when addressing the four most common trends described in the findings.

1. *Proactively address differences from a previous SIS-A.*

Consider providing protocols, guidance, and training to SIS-A interviewers and respondents on how to address the previous assessment during the completion of the most current assessment. This approach may decrease the number of request reviews linked to SIS-A rating concerns as needs rated in a previous SIS-A assessment are considered and evaluated at the time of the assessment.

2. *Update and ensure the ConSistency Guide aligns with current ODP requirements and AAIDD standards.*

Section 1 of the SIS-A is not norm-referenced. Therefore, this section may be utilized at the jurisdiction's discretion. While AAIDD requires a standardized approach, that is, all items are completed, nuances and state-specific needs may be attended to in this section. Consider adding further clarification to include timeframes and direction on how to rate "other" commonly scored items. AAIDD cautions from providing additional information about Section 2 as this section is norm-referenced.

3. *Review respondent criteria requirements to safeguard that the appropriate respondents participate in SIS-A interviews.*

While review requests did not mention the notion that supporters most informed about a person's needs were not present during an interview, it was apparent from credible, supporting documents that relevant information specific to the individual's support needs was not shared. It is also feasible to assume other reasons why information is withheld. Consider surveying respondents to clarify these reasons to determine how best to minimize the sharing of valuable information outside of an SIS-A interview.

4. *Provide information about the support needs levels/needs group (NL/NG) assignment process.*

The SIS-A was developed for multiple audiences and purposes. While the assessment provides valuable data, it is used in conjunction with other historical data to inform funding models/levels of support needs. Such ongoing clarification with service providers and families may provide for more definitive review requests. For instance, sharing how factors like current residence, environmental support, and acute care needs are addressed may move requestors away from lumping all needs into a SIS-A Family Friendly Review form. It may be helpful to establish a review process to address NL/NG disputes not influenced by SIS-A ratings.

ODP's Actions in Response to the Findings and Recommendations

1. *Improve Training and SIS-A Related Resources*

The audit revealed a need to improve both access to and content of training and preparatory materials for stakeholders involved in SIS assessments. ODP is taking the following actions to address:

- a) To provide for easier navigation to the SIS-A related resources on MyODP, ODP has created a new course page. The link to the page will be published in the near term via ODP announcement with other SIS-related updates.
- b) ODP has purchased a subscription to the AAIDD Learning Resource Center (LRC) and will embed a direct link to their materials on MyODP. This will provide stakeholders access to a myriad of training and resource materials related to the SIS.

- c) ODP will update and disseminate information on appropriate respondent selection. This was identified as a need by AAIDD in their audit findings. This was also a need identified by ODP in processing Requests for SIS-A Family Friendly Review. ODP has seen that discrepancies are sometimes caused by the use of respondents who are unable to answer questions with specificity because they are unfamiliar with the individual who is being assessed.
- d) ODP is updating our SIS-A Manual which will include resources for all stakeholders. The SIS-A and PA Plus User Manual is a comprehensive resource for all stakeholders, providing information on topics such as interview preparations, administration of the assessment, respondent criteria, urgent requests, roles and responsibilities, and how to request a SIS Review.
- e) ODP is updating the ConSISTency Guide for assessors. Additional guidance will be provided through quarterly assessor forums to address AAIDD's recommendations #1 and #3.
- f) ODP will begin publishing quarterly NL/NG data including by residence size for the residential population.

2. Implement SIS-A 2nd Edition

ODP is planning to transition to the SIS-A 2nd edition in early 2024. More information on transition efforts will be shared in the near future.

Once ODP has fully adopted the SIS-A 2nd Edition, ODP will accept requests for re-assessments of individuals for whom their most recent SIS assessment resulted in a NG decrease of 2 or more levels. Re-assessment will be conditioned on the receipt of a certification from the provider attesting that respondent selection criteria, in line with AAIDD guidance, has been met for all participating respondents and designated respondents have reviewed preparatory materials prior to the assessment.

3. Improve Timeliness of Assessments

In alignment with AAIDD's recommendation to complete SIS assessments every 3-5 years, ODP is addressing timeliness issues with the assessment vendor. ODP is monitoring the current vendor and has instructed the vendor on required steps to improve timeliness. ODP will be re-procuring the services of a SIS assessment vendor and intends to include stiffer penalties related to failures in performance measures for volume and delivery time.

4. Improve Discrepancy Review Process

AAIDD's audit was instructive in refining the discrepancy review process. ODP has developed and will release an electronic SIS-A Discrepancy Review Form. The new form and instructions will be available before the end of the calendar year.

Please let me know if you have additional questions.

Sincerely,



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Deputy Secretary
Office of Developmental Programs

Cc: Ms. Lauren House
Mr. Jeremy Yale
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