



COMMONWEALTH of VIRGINIA
Department of Medical Assistance Services

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December 20, 2018

MEMORANDUM

TO: Members of the General Assembly

FROM: Jennifer S. Lee, M.D. *JSL*
Director, Virginia Department of Medical Assistance Services

SUBJECT: The Impact of Implementing the Supports Intensity Scale to Determine
Individuals' Supports Levels and Reimbursement Tiers in the
DD Waivers – FY 2018 due October 1, 2018

This report is submitted in compliance with Item 307 G of the 2018 Appropriation Act which states: "The Department of Medical Assistance Services, in collaboration with the Department of Behavioral Health and Developmental Services, shall convene a stakeholder workgroup, to meet at least once annually, with representatives of the Virginia Association of Community Services Boards, the Virginia Network of Private Providers, the Virginia Association of Centers for Independent Living, Virginia Association of Community Rehabilitation Programs (VaACCSES), the disAbility Law Center of Virginia, the ARC of Virginia, and other stakeholders including representative family members, as deemed appropriate by the Department of Medical Assistance Services. The workgroup shall: (i) review data from the previous year on the distribution of the SIS levels and tiers by region and by waiver; (ii) review the process, information considered, scoring, and calculations used to assign individuals to their levels and reimbursement tiers; (iii) review the communication which informs individuals, families, providers, case managers and other appropriate parties about the SIS tool, the administration, and the opportunities for review to ensure transparency; and (iv) review other information as deemed necessary by the workgroup. The department shall report on the results and recommendations of the workgroup to the General Assembly by October 1 of each year."

Should you have any questions or need additional information, please feel free to contact me at (804) 786-8099.

JSL/

Enclosure

pc: The Honorable Daniel Carey, M.D., Secretary of Health and Human Resources

The Impact of Implementing the Supports Intensity Scale® to Determine Individuals' Supports Levels and Reimbursement Tiers in the DD Waivers – FY 2018

A Report to the Virginia General Assembly

October 1, 2018

Report Mandate:

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Executive Summary

The Department of Medical Assistance Services (DMAS) and the Department of Behavioral Health and Developmental Services (DBHDS) received and acted upon recommendations from both the 2017 and 2018 meetings of the Supports Intensity Scale (SIS®) Stakeholder Workgroup. As a result, communication about the SIS® to individuals and family members has improved.

In a study conducted by DBHDS, a comparison of individuals' support needs levels and related reimbursement tiers shows a high degree of consistency across the past two years. Further, an examination of individuals' stability in levels across time indicates that, for adults 22 years and older, conducting a SIS® assessment every four years, instead of the current practice of every three years, would have little effect on an individual's support level. If the American Association on Intellectual and Developmental Disabilities (AAIDD), the developer of the SIS®, supports the validity with the change in frequency for the assessment, DMAS and DBHDS will proceed with exploring the approach.

DMAS and DBHDS are committed to continued dialog and collaboration with the stakeholder workgroup.

About DMAS and Medicaid

DMAS' mission is to ensure Virginia's Medicaid enrollees receive high quality and cost effective health care.

Medicaid plays a critical role in the lives of over a million Virginians, providing health care for those most in need. Medicaid enrollees include children, pregnant women, parents and care takers, older adults and individuals with disabilities. Virginians must meet income thresholds and other eligibility criteria before qualifying to receive Medicaid benefits.

Medicaid covers primary and specialty health care, inpatient care, and behavioral health and addiction and recovery treatment services. Medicaid also covers long term services and supports, making it possible for thousands of Virginians to remain in their homes or to access residential and nursing home care.

Quick Medicaid facts:

- Covers 1 in 8 Virginians
- Covers 1 in 3 births and 33% of children
- Supports 2 in 3 nursing facility residents

Virginia Medicaid and Children's Health Insurance Program (CHIP) are administered by the Department of Medical Assistance Services (DMAS) and are jointly funded by Virginia and the federal government under the Title XIX and Title XXI of the Social Security Act. Virginia generally receives \$1 of federal matching funds for every \$1 Virginia spends on Medicaid.

Background

In September of 2016, DMAS in partnership with DBHDS redesigned Virginia’s 1915(c) home and community based waivers supporting individuals with intellectual and developmental disabilities. The new Developmental Disability (DD) Waivers were renamed the Community Living Waiver (CL), the Family and Individual Support Waiver (FIS) and the Building Independence Waiver (BI). In coordination with the implementation of the new DD Waivers, DBHDS began using the Supports Intensity Scale® (SIS®) to determine an individual’s level of support need and to inform the person-centered planning process. This report will review the impact of SIS® implementation including a review of data from the previous year, SIS® processes and communications.

The SIS® is a nationally recognized, validated assessment tool that was tested and refined by the [American Association on Intellectual and Developmental Disabilities \(AAIDD\)](#). The SIS® measures the intensity of support required for a person with a developmental disability in their personal, work-related, and social activities. Based on results of a SIS® assessment and supplemental questions, individuals are assigned to one of seven support levels. In general, individuals with mild and moderate support needs are in support levels one and two. Individuals with greater support needs are in a higher support level.

DBHDS contracts with Ascend to administer the SIS® by trained assessors, who receive ongoing inter-rater reliability reviews. [Ascend a Maximus company](#) is nationally recognized for specializing in programs for persons with physical disabilities and complex medical conditions, as well as persons with behavioral health, intellectual, and developmental disabilities. Ascend holds a U.S. Centers for Medicare & Medicaid Services (CMS) designated Quality Improvement Organization-Like Entity (QIO-like Entity) status, awarded in 2007.

For specific DD waiver services, there is a tiered provider reimbursement structure aligned with an individual’s support level. This means that DMAS pays a higher reimbursement for services provided to individuals in need of a greater level of support. The assessed support needs result in an assignment to a “support level” and the determination of reimbursement is a “tier.”

On April 30, 2018, DMAS and DBHDS held a stakeholder workgroup required by this legislative

mandate. The workgroup included the representatives noted in the mandate, as well as the Virginia Board for People with Disabilities, the Virginia Sponsored Residential Services Provider Group, a training center family advocate, and families who represented an individual from each of the five regions of the state and from each of the reimbursement tiers. During the meeting, stakeholders reviewed and discussed SIS® data and processes, including communication to families and individuals about the SIS®. Stakeholder workgroup members have been valuable contributors to this process and their participation is appreciated.

SIS® Level and Tier Data

The data in Tables 1, 2 and 3 show the distributions of SIS® support levels by tier and DBHDS developmental service region for each of the three DD waivers, as of April 2018.

Comparing 2018 to 2017, the distributions are very similar from year to year, which indicates there is a high degree of consistency over time. The overall distribution of individuals by support level continues to be consistent with the predictive model used to estimate the number of individuals who would fall into each level during the development of the waiver redesign. These models were included in the [Annual Report on the Impact of Implementing the Supports Intensity Scale to Determine Individuals' Supports Levels and Reimbursement Tiers in the DD Waivers-FY2017](#).

Table 1: SIS® Levels and Tiers for the Community Living Waiver by Developmental Services Regions

Community Living Waiver

CL	Tier	1			2		3		4			Total	%
	Level	1	2	D2*	3	4	5	6	7				
DS Region	Central	154	989	48	160	789	33	178	160	2,511	22.8%		
	Eastern	178	1,001	44	98	919	33	223	99	2,595	23.6%		
	Northern	153	944	59	114	837	41	203	175	2,526	22.9%		
	Southwestern	94	645	51	97	674	45	187	155	1,948	17.7%		
	Western	78	505	39	57	513	22	157	68	1,439	13.1%		
Total		657	4,084	241	526	3,732	174	948	657	11,019	100.0%		
		%	6.0%	37.1%	2.2%	4.8%	33.9%	1.6%	8.6%	6.0%	100.0%		

Table 2: SIS® Levels and Tiers for the Family and Individual Support Waiver by Developmental Services Regions

Family & Individual Supports Waiver

FIS	Tier	1			2		3		4			Total	%
	Level	1	2	D2*	3	4	5	6	7				
DS Region	Central	30	106	58	14	44	-	21	19	292	18.4%		
	Eastern	44	103	61	15	71	1	24	8	327	20.7%		
	Northern	57	174	106	26	90	4	57	32	546	34.5%		
	Southwestern	21	59	37	8	38	3	25	8	199	12.6%		
	Western	28	88	30	9	40	1	15	8	219	13.8%		
Total		180	530	292	72	283	9	142	75	1,583	100.0%		
		%	11.4%	33.5%	18.4%	4.5%	17.9%	0.6%	9.0%	4.7%	100.0%		

Table 3: SIS® Levels and Tiers for the Building Independence Waiver by Developmental Services Regions

Building Independence Waiver

BI	Tier	1			2		3		4			Total	%
	Level	1	2	D2*	3	4	5	6	7				
DS Region	Central	5	36	16	-	5	-	-	1	63	24.4%		
	Eastern	16	48	4	-	6	-	-	-	74	28.7%		
	Northern	13	27	15	1	5	-	-	-	61	23.6%		
	Southwestern	12	25	3	-	3	-	1	-	44	17.1%		
	Western	5	7	3	-	-	1	-	-	16	6.2%		
Total		51	143	41	1	19	1	1	1	258	100.0%		
		%	19.8%	55.4%	15.9%	0.4%	7.4%	0.4%	0.4%	0.4%	100.0%		

During discussion and analysis, stakeholders expressed concern about the disproportionately high number of individuals in Level 2. In response to this concern, DBHDS will be examining, through analysis completed by their contractor, Burns and Associates, the parameters for including individuals in this level to ensure that they are appropriately meeting individual's needs.

SIS® Processes

During the April 30th, 2018 stakeholder workgroup meeting, attendees reviewed data concerning the administration of the SIS®. This included data on the number of times an individual or guardian felt that the standard operating procedures were not followed, as well as the number of times a SIS® reassessment was requested based on a change in the person's support needs. The stakeholder workgroup examined several Ascend reports, including:

- the 2018 Annual Activity Report,

- the most recent VA SIS® Satisfaction Survey Quarterly Report, and,
- the Interviewer Reliability and Qualification Review report.

The Annual Activity Report stated that Ascend has completed 3,411 SIS® assessments between April 2017 and March 2018. The Satisfaction Report revealed satisfaction levels in the upper 90s – 100% range, as reported by individuals, family members, support coordinators and provider staff. Workgroup members requested to receive copies of Ascend's VA SIS® Satisfaction Survey Quarterly Report. DBHDS will provide these reports directly to the members in the future.

Workgroup members reviewed a copy of the white paper "Analysis of Virginia's Level System Utilizing the Supports Intensity Scale." DBHDS authored the paper in March of 2018 and studied the impact of changing the frequency of the SIS® assessment cycle for adults from every three years to every four years. The paper concluded that there is stability in results between a three year assessment cycle and a four year cycle. It was recommended that consideration be given to administering the SIS® assessment every four years instead of three for those adults 22 years of age and older. Conducting the SIS® assessment less frequently would have little impact on individuals' support needs levels and accompanying reimbursement tiers. Any individual that experiences a change of support needs may request a reassessment regardless of the next scheduled SIS® date. Moving toward a four-year cycle could save time and resources for Community Services Boards (CSB) and providers and result in fewer meetings for individual/family members.

Between August 2017 and June 2018, there were 10 SIS® Review Requests. A Review Request is a request to conduct the SIS® assessment again due to concerns that it was not completed properly. Of these 10 requests, seven requests were closed, one resulted in a new SIS® scheduled, and two are awaiting a decision. A SIS® Reassessment Request can also be made for a significant change in the person's support needs. The information and outcomes for this type of request was not available for the stakeholder workgroup meeting. This data will be provided at a future date for analysis and discussion.

The DBHDS SIS® support team also received 30 other SIS® related inquiries, separate from the Review

Requests, which were addressed via education and guidance.

Communications Regarding the SIS®

In response to a request from the workgroup at the 2017 meeting, DBHDS formed a subgroup of the larger workgroup. This subgroup reviewed and provided input on materials to be sent to individuals and guardians new to the waiver, and materials to those already receiving supports under of the DD waivers. The final products provide additional explanation about the SIS® process and Ascend. These products include:

- an introductory letter about the SIS®,
- the *SIS® Individual and Family Respondent Presentation*,
- “What to Expect” from the SIS® interview handout,
- SIS® FAQs,
- website information for Ascend and AAIDD,
- the *SIS® Standard Operating Procedures and Review Process* and

- a Sample SIS® report.

The 2018 stakeholder workgroup members suggested that Ascend schedulers offer these items when scheduling the interview to those already enrolled in the waiver. The cost of mailing these materials is being priced by Ascend. The workgroup members also requested that the final version of the “initial letter,” introducing the SIS® to individuals who are new to the waiver, and the “SIS® renewal letter,” reminding existing waiver recipients that they are due for an updated SIS®, be distributed to the workgroup members and all CSBs. DBHDS completed this request.

In addition to continued availability of the *SIS® Individual and Family Respondent Presentation*, training events titled *The SIS® and Its Role in Planning* were provided to 30 support coordinators and administrators in 2018. A *SIS® Support Coordinator Refresher* training was also provided to 21 support coordinators this year.