

Pennsylvania Association of Resources
Autism • Intellectual Disabilities

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March 24, 2008

Mr. Kevin Casey, Deputy Secretary
Office of Developmental Programs
Department of Public Welfare
P.O. Box 2675
Harrisburg, PA 17105-2675

Via email: ra-ODPComment@state.pa.us

Re: Comments on the Draft Bulletin *Supports Intensity Scale*® (SIS®) and PA Plus Manual

Dear Deputy Secretary Casey,

Thank you for the opportunity to provide comments and make recommendations on the above referenced documents.

As you know, the Pennsylvania Association of Resources for Autism and Intellectual Disabilities (PAR) is a statewide association whose members provide the full range of supports and services to more than 45,000 individuals with intellectual disabilities including 8,000 people living with autism in over 5,600 locations.

Our specific comments and recommendations are included below.

Comments and Recommendations on Draft Bulletin:

Section: *Discussion* (pg. 3)

Discussion: In 2005, The SIS+ Workgroup convened by ODP unanimously made a specific recommendation to ODP that the SIS Assessment ***should be allowed, but not required***, to replace any provider assessments required in licensing regulations. The statement in this section of the bulletin is in direct opposition to that recommendation, indicating that “the SIS and PA Plus are not a replacement for the provider assessments required in the licensing regulations.”

PAR recommends that the SIS be the only required assessment, but that it not prohibit providers from using additional assessments as determined useful in the planning and delivery of their services.

Recommendation: Clarify that the SIS is the only required assessment, and that providers are encouraged, but not required to use additional assessments as determined useful in the planning and delivery of their services.

Comments and Recommendations on PA Plus Manual

Section: *Purpose of the SIS and PA Plus Manual* (pg. 3)

Discussion: This section further supports the recommendation noted above for the assessment to meet all licensing requirements for assessments, in that the SIS and PA Plus are the single needs assessment required in the system, enhancing and promoting consistency and equity in the service system.

At the same time, certain types of services may be enhanced by the use of other assessments **in addition to** the SIS and PA Plus. These tools should be allowed based on the discretion of the service provider as they are specific to their areas of expertise or their service focus. There should be no limitation on the additional assessments that may be utilized.

Recommendation: Clarify that the SIS is the only required assessment, and that providers are encouraged, but not required to use additional assessments as determined useful in the planning and delivery of their services.

Section: *Identifying Participants* (pg. 6)

Discussion: Paragraph 5 states that “information gathered during the assessment process will be helpful in development of the initial ISP.” If that is the case, why would the same information not be most helpful in the development of subsequent ISPs?

Paragraph 6 is important to include in this document, because it makes clear that these assessments should be coordinated with ISP development. Conducting the assessment at any other time would be inefficient and cause confusion, reducing the effectiveness of the process.

Recommendation Add “and subsequent” after “the initial” so it reads “information gathered during the assessment process will be helpful in development of the initial and subsequent ISPs.”

Section: *Scheduling Assessments* (pg. 7)

Discussion: It would seem that notifying participants 60 days in advance of their assessment, which must precede development of the ISP so that the results can inform the ISP, will require a commitment on the part of ODP to validate the list of AE identified respondents more than 60 days in advance. The list needs to be validated 90 days in advance, giving the vendor time to coordinate its schedules and notify the intermediaries.

Recommendation: Replace 60 days with 90 days.

Section: *Failure to Schedule* (pg. 7)

Discussion: ODP should make the final determination as to whether the number of cancellations, and the circumstances around those cancellations, is a valid reason to terminate waiver services.

There is no requirement in this section that the supports coordinator schedule the assessment at a time when the person or their family is available. Scheduling during typical working hours, without providing options or without consultation, might for some people/families cause a series of cancellations. If there is an expectation that supports coordinators would make every attempt to schedule the assessments in a manner that considers the commitments of the person/family, such an expectation should at least be stated in this bulletin.

Recommendation: Add the statement “ODP shall make the final determination as to whether the number of cancellations and circumstances around those cancellations is a valid reason for terminating waiver services and will provide clear due process around it.”

Recommendation: Add the statement “All efforts shall be made to consider the scheduling needs and preferences of the participants and their families.”

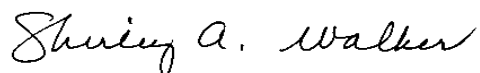
Section: *After the Meeting* (pg. 8)

Discussion: Paragraphs 2 and 3 omit provision of results to current providers of services. Especially because ODP has specified that the assessment should inform the ISP, service providers must be given access to the results, both via the “handwritten copy” and via HCSIS once it is finalized. For service providers to be effective in planning and providing services and supports, they must be able to access the results of the assessments immediately.

Recommendation: Add providers to the list of entities able to view the assessment after it is finalized in HCSIS, and to the list of entities able to request a handwritten copy prior to its finalization.

Thank you for considering our comments and recommendations.

Sincerely,



Shirley A. Walker
President and CEO