



# Department of Developmental Disabilities

**John Kasich**, Governor  
**John L. Martin**, Director

To: ICF-IID Providers

From: John Martin, Director  
Patrick Stephan, Deputy Director, Medicaid Development and Administration  
Ginnie Whisman, Deputy Director, Division of Residential Resources

Subject: Individual Assessment Forms

Date: November 15, 2012

As part of the transition of the ICF-IID program from the Department of Job & Family Services to the Department of Developmental Disabilities, Am. Sub. H. B. No 153 required the departments to conduct a study of the Individual Assessment Form (IAF). A stakeholder workgroup was formed in October of 2011 to begin a review of the IAF.

During workgroup meetings, many concerns were expressed related to the consistency in which providers are completing assessments, including specific questions where it was felt that inconsistencies exist. The group identified "IAF creep" as how assessment results have slowly moved more towards the higher reimbursement RACS over time.

## Initial Study

Based on this feedback, the department decided to begin researching where inconsistencies may exist. The department worked with The Ohio Colleges of Medicine's Government Resource Center (GRC) to select a statistically valid sample of facilities to include in this research. A questionnaire was created and vetted through the IAF workgroup. Department staff visited the selected facilities to obtain provider responses to the questionnaire. Department staff also completed IAF assessments on a few randomly selected individuals for each of the facilities in the sample group.

The results of the questionnaire and assessments were provided to GRC for analysis. GRC created statistical models to analyze the information gathered. The analysis of the sample assessments showed a lack of inter-rater reliability between provider assessments and those completed by DODD. Results from the questionnaire also showed areas of inconsistency amongst how different providers respond to questions on the IAF tool. Through interviews with participating providers, DODD staff also observed many inconsistencies in how providers answer many questions on the IAF. An example of this is that some providers would require an individual to be able to peel a hard-boiled egg before they would rate them as independent in the area of eating.

GRC provided several recommendations for the department to consider as next steps in the study of the IAF. These included regular training, clarification of the guidelines, updating the mode of transmission and having a third party conduct assessments or perform regular facility audits of the IAF. The department has decided to implement several of these suggestions.

The department, with feedback from the IAF workgroup, has revised the instructions to the IAF to clarify the original intent of the questions and to eliminate some of the room for interpretation that exists in the current instructions. The revised instructions are included in this letter and are available on the ICF-IID page of the department's website (<http://dodd.ohio.gov/medicaid/Pages/ICF-IID.aspx>).

The Division of Medicaid Development and Administration will be providing training to ICF-IID staff around the revised instructions. ICF-IID staff will need to attend this training and successfully demonstrate an understanding of the training in order to complete IAFs in the future. The training dates, times and locations, as well as instructions for registration, are attached to this letter and are also available on the ICF-IID page of the department's website.

#### State-wide Assessments

In addition, the department will be conducting state-wide assessments of all residents of ICF-IID facilities during the first quarter of 2013 and intends to utilize these assessment results for FY14 rate setting as both the average annual and quarterly case-mix scores. As a Medicaid funded program, the State has a responsibility to ensure the equitable allocation of funding across providers. Performing state-wide assessments will eliminate the inconsistencies that currently exist in the scoring of the IAF. The original intent was to follow the GRC recommendation to contract with a third party to complete these assessments. A determination was made that there existed the qualified resources within the Department to accomplish this task efficiently and properly.

The Division of Residential Resources will provide QIDP qualified staff, including SIS certified assessors, to complete the assessments. The initiative will be led by Brent Baer, MSSA, LSW and Susan Arnoczky, Ph.D. Assessors will attend training held by the Division of Medicaid Development and Administration. Assessors will need to demonstrate an understanding of the training and will complete sample IAFs on Developmental Center residents to ensure inter-rater reliability prior to beginning the state-wide assessments.

Every effort will be made to contact each facility two weeks in advance to schedule a time for assessors to complete the IAFs for the residents of that facility. We ask that provider staff be available to assist the assessors in obtaining critical information and answering questions that the assessors may have. The assessor will be observing a meal time and medication pass for each individual they assess. The following documentation will need to be available to the assessor for review:

- Comprehensive Functional Assessment (CFA)
- Individual Service Plan (ISP)
- Behavior Support Plan (BSP)
- Behavior Support Guidelines/Instructions for Staff
- Medication Administration Record (MAR)
- Behavior Support Charting/Data Sheets
- Physician Orders (PO Sheets)
- Any other data used to determine/support the IAF rating

After the department assessors have completed the assessments on all of the individuals in your facility, they will ask if what they observed was typical for those individuals. If it was not, the facility will be allowed to provide documentation to support this. Copies of the score sheets will be left with the facility, but final results for all residents of your facility will be mailed by the department. If the provider feels there was a material error in the assessment of an individual, a process will be set up for a request for reconsideration. The department will examine each reconsideration request and make a determination of the correct assessment score.

If you have any questions related to the study of the IAF or the revised IAF instructions, please contact Debbie Jenkins ([Deborah.Jenkins@dodd.ohio.gov](mailto:Deborah.Jenkins@dodd.ohio.gov)) at 614-387-0578.

Questions related to the state-wide assessments can be directed to Brent Baer at 614-562-3114 ([Brent.Baer@dodd.ohio.gov](mailto:Brent.Baer@dodd.ohio.gov)) or Susan Arnoczky at 614-371-0620 ([Susan.Arnoczky@dodd.ohio.gov](mailto:Susan.Arnoczky@dodd.ohio.gov)).