

## MEMORANDUM

**TO:** Interested Parties  
**FROM:** Monica White, DAIL Commissioner  
**DATE:** November 10, 2021  
**RE:** SIS-A Status



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### SUMMARY:

In response to Vermont Care Partners' (VCP) requests to pause the rollout of the Supports Intensity Scale- Adults (SIS-A), the Department of Disabilities, Aging, and Independent Living (DAIL) had multiple discussions with VCP, reviewed federal regulations in detail, and received input from additional stakeholders. We have determined after much mindful consideration, that the SIS-A assessments will continue.

### DISSENTING FEEDBACK RECEIVED:

It is clear that the opinions of those receiving developmental disability services do not align with the VCP requests to pause the SIS-A assessments. DAIL received feedback from Green Mountain Self Advocates and the Vermont Developmental Disabilities Council (DD Council) that these groups, representing persons with developmental disabilities, support continuing the SIS-A rollout. Additionally, the DD Council does not support the continued use of the homegrown assessment tool. Further, at the State Program Standing Committee (SPSC) for Developmental Services meeting on 10/21/2021, two members who identify as Self-Advocates abstained from voting in support of the SPSC endorsing VCP's request.

### FEDERAL LANDSCAPE:

It is clear that there are significant pressures on service providers, as well as self-advocates and families due to the pandemic and workforce crisis, however we are obligated under part [42 CFR 441.720](#) of Vermont's Global Commitment to Health 1115 Waiver Special Terms and Conditions to conduct needs assessments that are independently administered outside of the agency that provides services.

DAIL was recently notified by CMS that Vermont is going to be required to address conflict of interest in case management. As we evaluate how to make these changes, with extensive stakeholder input, we will be considering how payment reform, the future payment model, and the use of standardized assessments fit into a future service delivery model. The SIS-A is a validated tool and offers an independent assessment of a person's support needs in a reliable

format, which will help reduce conflict of interest in services and provide an equitable approach to matching people to the services that fit their individual needs.

A pause in the SIS-A would require DAIL to terminate the contract with Public Consulting Group (PCG), the company administering the assessments. Termination of this contract would be a decision that would be poorly received by our Federal partners, and would result in a setback of the gains that have been made by training and onboarding the SIS-A assessors for Vermont, as well as the improvements that have been made in the implementation of the tool. If the contract with PCG was canceled, when we restart the process in the future, DAIL would have to repost the Request for Proposals, select and contract with a new vendor in the event PCG did not want to reengage, hire and train new assessors, and repeat the rollout process again and our external partners would potentially experience the inevitable challenges of onboarding a new vendor once again.

### **ADMINISTRATIVE SIMPLIFICATION:**

DAIL does understand and acknowledge the amount of stress staff, self-advocates, and families are under and would like to work together to mitigate the impact. Accordingly, we are implementing the following measures to improve the process and reduce the time requirement for DA/SSA staff:

- DA/SSA staff will have the option to have no more than 3 consumers on their caseload complete a SIS-A by March 31<sup>st</sup>. If more than 3 people on a caseload are scheduled for an assessment, staff can notify PCG, and PCG will work with the agency to identify different consumers to receive an assessment. With this change, we anticipate that Case Managers will spend no more than a total of 9 hours on SIS-A activities for the nine month period between July 2021 and April 2022.
- We will reduce the target number of assessments that PCG will complete by March 31<sup>st</sup> from 700 to 500.
- DA/SSA staff can request that the PCG schedulers space out assessments between now and March 31<sup>st</sup>, they do not need to be back to back if a person has more than one consumer receiving a SIS-A.
- The PCG schedulers will make all necessary phone calls to set up the assessments and agency staff will not have to take time to do any scheduling.
- Assessment scheduling will also involve the local PCG assessors, who will reach out to start building the rapport with self-advocates and families earlier in the process.
- PCG schedulers have expanded their hours to try to make it easier to contact them and reduce “phone tag”.
- PCG assessors will work across regions to provide more appointment availability and schedule assessments when it is convenient for self-advocates, families, and providers.
- PCG will send materials to self-advocates and families to explain what the SIS-A is and why VT is making the change.
- The 500 people participating in the assessments prior to April 1, 2022 will not have their SIS-A results used to make any changes to their individual budgets in the future. Results will be used to assist the payment model design but will not impact their funding.
- PCG is currently exploring offering Zoom as an option, which may help the assessment meetings become more user friendly, since many consumers and families are more familiar with that platform.

- Providers will not be asked to complete Local System of Care Plans for 2022, while this is not a payment reform activity, it is a time-consuming project that we won't require this year in an effort to reduce tasks being asked of providers.
- In the future, DAIL will work with PCG to offer free trainings on Person Centered Planning with the SIS-A to any interested staff.
- DAIL will work with PCG and the Developmental Disabilities Council to improve the plain language explanations of the process so that individuals and families are better informed of the process.
- We invite specific input/requests on how we could mitigate any additional administrative burden for our DA/SSA providers.

### **PAYMENT REFORM PAUSE:**

Additionally, one of the main concerns we've heard repeatedly is that DAIL isn't able to say how the SIS-A results will be used to create a payment model or how it will impact individual and overall agency budgets. DAIL will be working on designing a payment model in the future and will absolutely involve providers, self-advocates, families, and additional stakeholders in this process, but we can't move forward to begin that work without the results of these initial 500 assessments to inform the process. DAIL is committed to involving all the impacted stakeholders in the payment model development and will commence that work once workforce stabilizes and service provision returns to more typical levels. This is an area of payment reform that we will pause until conditions are more manageable.

We look forward to continuing to work together with all our interested stakeholders via transparent and robust dialogue on all of the above noted topics and others, in support of Vermonters who receive developmental disability services.