



COMMONWEALTH of VIRGINIA

DEPARTMENT OF BEHAVIORAL HEALTH AND DEVELOPMENTAL SERVICES

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MEMORANDUM

To: Community Service Boards and DD Waiver Providers
Thru: Connie Cochran
From: Eric Williams
Date: April 5, 2018
Re: WaMS ISP Transition Update

The Person-Centered Individual Support Plan (ISP) has long been the document that provides critical information about people who access developmental disability services in Virginia. The design supports the creation of comprehensive person-centered plans that detail what is important **TO** and important **FOR** each person. A major milestone of this ten year effort is the shift of the ISP into an electronic format within the Waiver Management System (WaMS). This transition will provide more consistency in use, as well as access to nightly updated ISP data. This data will support planning and improve efficiencies in reporting by consolidating data reporting requirements required of Community Service Boards (CSBs). The ISP will contain information about each person with a DD Waiver in Virginia that will be accessible in a single location online to members of the planning team, DMAS and DBHDS.

Background

In July of 2016, DBHDS agreed to partner with CSBs to develop and implement the ISP within WaMS to collect information required for reporting related to the Centers for Medicaid and Medicare Services (CMS) assurances and the Settlement Agreement. In October of that year, the following problem statement was identified:

“The CSBs who utilize their EHRs for centralized records and for billing case management are concerned that double entries into WaMS and EHRs will be time intensive. The work group's goal is to eliminate or reduce double data entry, increase overall system efficiency/productivity, and remove or shift tasks from case managers whenever possible.”

DBHDS actions to address this problem:

1. Complete data transfer of the case management sections of the ISP (Parts I, II, III, & IV), enabling case managers to enter data in the CSB EHRs for transfer into WaMS
2. Secured funding to implement a temporary provider process to extend the data entry deadline an additional year through FY19
3. Excluded the SC Part V from WaMS for case managers

4. Executed a sole source contract for the WaMS vendor to develop specifications for the CSB EHR vendors
5. Committed \$1.2 M to accomplish this data exchange, which includes the cost incurred by the CSB vendors and the WaMS vendor.

DBHDS has acknowledged the challenges faced by case managers in the revamped developmental services system and is currently engaged in efforts with the VACSB to provide additional guidance, support, and make necessary system changes to enable case managers to achieve the outcomes articulated by the Settlement Agreement. To achieve full compliance with the Agreement, the ISP remains a critical element. To date, the Commonwealth is out of compliance in most of the case management provisions. Some of the reasons are due to the fact that the following provisions cannot be documented: individual changes in status, case managers making timely referrals and service changes, and amending plans as needed. The ISP was designed within WaMS to address these as well as other operational needs.

In addition, the ISP process must address if the case manager has performed the following:

1. Discussed employment and established employment goals
2. Promoted all integrated residential and day options
3. Discussed what to do if a crisis occurs
4. Performed any type of risk assessment
5. Created ISPs using person-centered planning principles
6. Monitored providers for person-centered service delivery as required by the Settlement Agreement

To ensure these requirements will be met, three options were considered in determining the path forward to ensure that data needed to meet these reporting requirements are available in WaMS. The first option was to have CSBs pull information from WaMS into their electronic health records (EHR) to reduce double entry into both WaMS and EHRs. The second was to have CSB EHRs push information into WaMS to allow case managers to work primarily in the EHR. The third was to provide access to WaMS from within the CSB electronic health record environment.

CSBs selected the second option to establish a secure exchange between systems to meet a June 30, 2018 deadline to have ISP data available in WaMS. DBHDS communicated, at that time, that support to pursue the second option would be provided to the extent possible, recognizing the perils of negotiating the option from conception to realization.

In the months that followed, a joint WaMS Integration Team worked through the ISP elements and the processes needed to establish the data exchanges with multiple EHR vendors. This process required additional funding and a detailed walk through the ISP elements, as articulated in a March 2017 VACSB position statement. This resulted in a finalized set of Data Extract Specifications provided in December of 2017. A deadline for the availability of ISP data in WaMS was finally agreed upon as June 30th, 2018 to allow time for the development of the data exchanges.

In the course of development, DBHDS also reviewed with DMAS Quality Management Review and the Offices of Licensing and Human Rights. Additional guidance will be provided on how to provide information requested during reviews. In addition, WaMS can store the ISPs for the required six years, even as individuals receiving waiver services move from provider to provider or from one CSB to another CSB.

More recently in 2018, DBHDS agreed to review additional requests and made additional concessions to achieve a balance between data needed by DBHDS, the minimization of duplicate entry for case managers and providers, and the provision of a manageable process for vendors developing revisions to EHRs and data exchange processes. CSBs identified that the initial deadline in June would not be possible due to the inability

to map information from existing EHR structures to the newly developed structures needed to align with the WaMS ISP. To avert the need for direct entry in relation to this deadline and to begin having data in the system on July 1st, DBHDS agreed to shift funding to develop an interim Part V: Plan for Supports for provider use on July 1, 2018 and allow for CSB data entry to occur with each annual during fiscal year 2019.

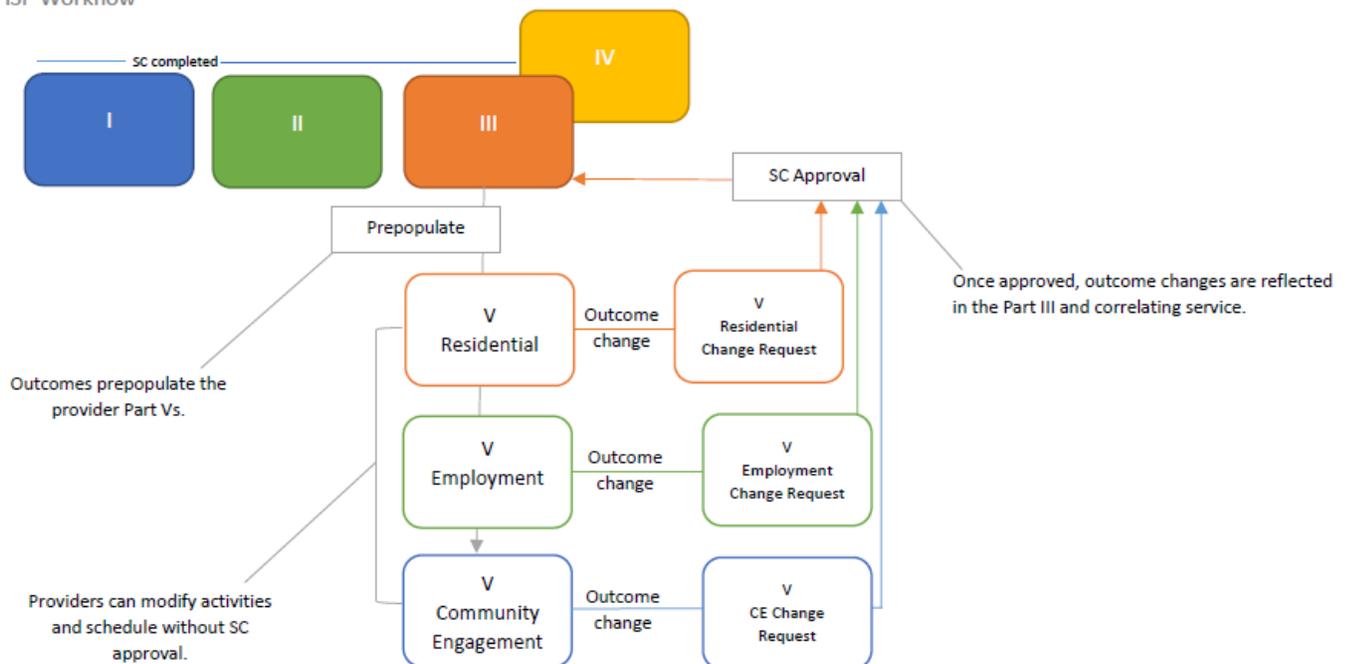
The following chart conveys the final expectations for the input of information in WaMS:

ISP Data	Frequency of input	Source of input
Part I: Essential Information	At annual and ongoing	Case Management
Part II: Personal Profile	At annual and ongoing	Case Management
Part III: Shared Planning	At annual	Case Management
Part IV: Agreements	At annual	Case Management
Part V: Plan for Supports	At annual and ongoing	Waiver Providers
<i>Interim Part V: Plan for Supports</i>	<i>Outcome changes prior to FY19 ISP</i>	<i>Waiver Providers</i>

Part V Transition

Within WaMS, “Part III: Shared Planning” is a living document that details changes across services throughout the ISP year. It maintains the elements of each outcome, is initially entered by the case manager, and is then modified through a provider Part V: Plan for Supports update process during the ISP year. In this manner, changes in the person’s waiver plans are submitted, reviewed, approved, and then consolidated within WaMS for access by the planning team.

ISP Workflow



Providers’ Part V: Plan for Supports will not be provided through data exchanges at this time. Data exchanges are only available to CSBs utilizing electronic health record systems for the transfer of information located in Parts I, II, III and IV of the ISP. The Department is fully aware that many providers rely on internal electronic health records and are concerned about the impact of the WaMS ISP on their internal processes. In order to maintain the integrity of the WaMS system to generate reliable data and meet its intended purpose while

easing use, DBHDS is implementing a dual approach for provider use of the WaMS ISP Part V. Specifically, providers will have two options (either *complete use* or *modified use*) in order to complete Part V in WaMS. This dual approach will be preceded by an interim Part V process, which all providers will begin on July 1, 2018.

This dual approach will also be detailed in provider training and guidance materials prior to July 1. A provider may use WaMS to request outcome changes in the ISP for an individual and continue to upload a copy of their own Part V format, or providers may enter all Part V elements in WaMS, in effect using the WaMS ISP for their Part Vs while only uploading a copy of the support instructions, which are not captured in the WaMS data fields.

Side-by-side Part V use comparison:

Part V Element	Complete WaMS ISP use	Modified WaMS ISP use
Outcome section pre-populated by WaMS	Yes	Yes
At least one support activity per outcome	Yes	Yes
A summary of support activities per outcome	No	Yes
Support activity measures entered	Yes	No
Data method identified	Yes	No
Skill-building indicated (radio button, yes/no)	Yes	Yes
Frequency of supports	Yes	No
Target date	Yes	Yes
General Schedule	Yes	No
Safety Restrictions	Yes	No

In summary, prior to each person’s FY19 annual ISP, service providers will only use the WaMS ISP for requesting outcome changes to current plans. As each person’s annual ISP occurs in FY19, CSBs will ensure complete entry of plan content for Parts I, II, III, and IV, and providers will initiate complete or continued modified use of the Part V: Plan for Supports.

We recognize the immense amount of change that our system has gone through in the recent past and the compromise does entail providers and CSBs continuing to work in two systems unless a CSB or provider elects to work only in WaMS. We will work with CSBs and providers towards a smooth transition. It is worth noting that we believe the effort to have a centralized location to enhance communication will directly benefit the individuals with developmental disabilities receiving both waiver services and case management services. In addition, the extensive planning and development of WaMS and subsequent changes with the data exchange will reduce the need for unexpected or extraneous data requests, as well as reduce the work required to access needed data.

Below is a timeline of key events as we move forward with this effort. If you have questions about this communication, please email to eric.williams@dbhds.virginia.gov using the subject line LIVE ISP. We will work to address your questions as we prepare guidance and information for ISP trainings.

WaMS ISP Transition Timeline 3.12.18

