



December 14, 2012

John Martin, Director
Ohio Department of Developmental Disabilities
30 East Broad Street, 13th Floor
Columbus, OH 43215-3434

Dear Director Martin,

We are writing to express concerns about the QIDP testing being conducted as part of DODD's IAF provider training. Staff who do not pass are considered "unqualified" to conduct the IAF assessments at their own facilities and are also prohibited from doing so until they re-take the test and pass. No dates/times/locations for re-testing have been provided. In addition, we understand that this testing is not specific to the re-basing process but is intended to be an on-going requirement. We have several questions and concerns about this; both in the near term and for future processes. They are as follows:

- QIDP testing has never been discussed. DODD's 11/15 memo states "ICF-IID staff will need to attend this training and successfully demonstrate an understanding of the training in order to complete IAF's in the future". This sentence does not refer to testing. When was testing decided upon?
- Who developed the test and has there been impartial verification that the test measures competence?
- We understand that the test can take up to an hour to complete and a score of 80% indicates a pass. Anything less than 80% is a fail. Are all of the questions scored OR just the ones that pertain to the trigger questions? I would think that to prove one can "demonstrate an understanding" you would focus on comprehension regarding just the trigger questions. I don't understand the purpose of digging any deeper. Can you explain?
- When are re-test sessions going to be scheduled?
- Are additional training sessions being scheduled? Many ICF providers are reporting that they can't get their staff into training because they are full.
- We have recently been informed that IAF testing is going to be an on-going process. Again, this has never been discussed with the stakeholders. We oppose this additional requirement and question its benefit to the ICF program.
- Ohio's QIDP qualifications mirror those in federal law. We are concerned that this new requirement ignores the federal requirements re: QIDP's.

Our understanding has been that training would occur and that look behind and exception reviews would begin after the re-basing in order to insure consistency of application across provider agencies. The testing and "qualifying" of provider staff is a significant departure from what has been told to us in various meetings with DODD. We would really appreciate the opportunity to meet with you to discuss this and work towards a more reasonable mechanism to insure provider staff understands the IAF. If there are concerns about the qualifications if ICF staff and the IAF, any changes to staffing requirements need to be discussed with stakeholders and adopted in a thoughtful manner.

Mark Davis, President
Ohio Provider Resource Association (OPRA)

Peter Van Runkle, Executive Director
Ohio Health Care Association (OHCA)

cc: Patrick Stephan, DODD
Debbie Jenkins, DODD
Kate Haller, DODD