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TO: ITOTS Stakeholder Group,
FROM: Karleen Goldhammer
RE: CCS3 /ITOTS Analysis

A handwritten signature in green ink that reads "Karleen R. Goldhammer".

The following represents an analysis about the usefulness of the CCS3 system for meeting the data needs of the Department of Mental Health, Mental Retardation, and Substance Abuse Services (DMHMRSAS) with respect to the Early Intervention System. Currently, Early Intervention data is collected through the Infant and Toddler Online Tracking System (ITOTs), a web based system accessible by each of the 40 Local Lead Agencies (LLAs). Early Intervention is undergoing significant system change which requires data system expansion in order to meet the requirements of increased Medicaid reimbursement, as well as the currently identified needs for expansion related to OSEP reporting requirements, state and local monitoring, administration and forecasting needs.

The Stakeholder Group process, initiated in January 2007, was envisioned as the vehicle to review the needs of the Early Intervention community. Selected members of the VACSB Data Management Committee were invited to participate. This analysis is important since conceptually there is merit to using the existing conduit of data exchange between the CSBs and DMHMRSAS as a viable opportunity for data expansion. Members of the ITOTS Stakeholder Group should freely distribute this paper to individuals involved with the CCS data reporting process so that a more thorough discussion can occur.

Community Consumer Submission (CCS) is a system which compiles data about the consumers of mental health, mental retardation, and substance abuse and the services they receive. CCS provides data for comparisons and trends on the characteristics of persons receiving these services from Community Service Boards (CSBs). A total of 49 data elements are submitted across three (3) files: consumer, service, and type of care. CCS3, the current version, requires monthly submission from all CSBs and is the basis of performance measures between DMHMRSAS and the CSBs. All 49 data elements are listed in Appendix A to this document, with the seven (7) fields matching those in ITOTS highlighted.

The web based **ITOTS** data system for the Virginia Early Intervention system relies on data entry of information from the Individual Child Data Form ICDF Form 402 upon entry of a child into the system. There is an annual requirement to update the location of service since it is a required federal reporting obligation. Exit information is later added when the child transitions out of Part C. The referral, eligibility, some IFSP information and initial planned services are captured within

the system. The ITOTS is primarily used for meeting the Section 618 federal data reporting requirements. All information is data-entered via the web by a designated person or personnel at the Local Lead Agency. Most of the information stored in the electronic system is not routinely updated. This reporting system essentially captures information from the child's initial plan of care.

ISSUES

1. Of the 49 CCS3 data elements, six (6) clearly match data items in ITOTs with additional item (cognitive delay) a partial match.
 - a. The purpose of each data system is vastly different. CCS is designed for capturing encounter records. ITOTs is primarily for meeting federal reporting requirements, primarily based on the plans of care.
 - b. City or County of Residence Code (FIPS), Referral Source, Date of Birth, Gender, Race. Cognitive Delay, while a data element that does indirectly match in ITOTS, represents only one (1) facet of eligibility.
2. The federal reporting requirements could not be met with CCS. Many data elements are missing including eligibility, current plan of care information and primary location of planned service.
3. The U.S. Department of Education also requires performance reporting on issues of timely entry into the system, timely start of service, service outcomes and transition out of the Early Intervention System at or before age 3. None would be available within CCS.
4. 30 of the 40 organizations are not Community Service Boards. The CCS system would have to expand the Agency list to include non-CSB entities. Those agencies would also have to have data systems to support the extract process and would have to login to the state system.
5. Not all of the 30 Community Service Boards require data entry of Early Intervention into the organization's data system. The most common link to the CSB data system is for the purpose of billing to external third-party resources.

CONCLUSION

The current Early Intervention systemic change, including the partnership with DMAS to expand Medicaid coverage for Early Intervention services, requires enhanced levels of accountability and reporting from today's system. The use of a CCS system would clearly be a significant data setback. Local Lead Agencies currently rely on many Microsoft Excel Spreadsheets to supplement ITOTs data. Many local system managers report that data support within the CSBs is primarily for billing and not for program management.

If the ITOTS expansion is successful, it will be the unanimous recommendation of the Stakeholder Group members present to remove Early Intervention from the CSB data systems to eliminate duplicate data entry issues. It is my judgment that the CCS system is a poor fit for meeting the more rigorous data requirements for the Part C Early Intervention system.

CCS3 Data Elements Comparison to: Infant and Toddler Online Tracking System (ITOTs)

CCS 3#	CCS 3 Data Element	Early Intervention Comment
2	Agency (CSB) Code	Need 10 (25%) non-CSB entities to be added to the mix
3	Program Area ID	Early Intervention not specified
5	Service Code	Specific Early Intervention codes not available
7	Consumer ID (CSB Level Unique ID)	
8	Statewide Unique Consumer ID (hashed SSN)	
10	Units (of service)	Proposed ITOTs Expansion
12	Discharge Status	Specific Early Intervention codes not available
13a	SMI/SED/At-Risk of SED	
13b	Cognitive Delay	This is one component of eligibility (partial match)
14	City or County of Residence Code (FIPS)	
15	Referral Source	Some Early Intervention codes not available
16	Date of Birth	
17	Gender	
18	Race	Some Early Intervention codes not available
19	Hispanic Origin	
21	Education Level	
22	Employment Status	
23	Type of Residence	
24	Legal Status	
25	No. of Prior Episodes Any Drug or Alcohol Prog	
26,27	Diagnosis Axis I Codes	
28,29	Diagnosis Axis II Codes	
30	Diagnosis Axis III	
31	Diagnosis Axis V - Current GAF Code	
32-43	SA Primary, Secondary, Tertiary Drug	
44	Pregnant Status	
45	Female with Dependent Children Status	
46	Days Waiting to Enter Treatment	
47	Number of Arrests	
48	Service From Date	
49	Authorized Representative	
52-55	Axis I (codes 3-6)	
56	Consumer Service Hours	
57	Medicaid Number	
58	Consumer First Name (statewide index)	Not transmitted to the Department
59	Consumer Last Name (statewide index)	Not transmitted to the Department
60	Type of Care Through Date	
61	Type of Care From Date	
62	Service Through Date	
63	Staff ID	Optional

Infant and Toddler Online Tracking System (ITOTs) Data Item Match