The Arc Indiana

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September 30, 2026

VIA EMAIL

Jordan Stover
General Counsel
Indiana Family and Social Services Administration
402 W. Washington Street, Room W451
Indianapolis, IN 46204
Jordan.Stover@fssa.IN.gov

Re: Public Records Request – InterRAI Implementation and Level-of-Care Determinations

Dear Mr. Stover:

Pursuant to the Indiana Access to Public Records Act, Ind. Code § 5-14-3, The Arc of Indiana requests the following records concerning FSSA's implementation and use of InterRAI assessments for individuals with intellectual and developmental disabilities, including for ICF/IID level-of-care determinations and redeterminations.

This request is intended to obtain records regarding Indiana's implementation, administration, training, decision-making methodology, and use of InterRAI assessment data. We are not requesting that FSSA reproduce or publicly distribute copyrighted InterRAI manuals or other copyrighted materials that FSSA is legally prohibited from reproducing.

1. Level-of-Care Eligibility Methodology and Decision Logic

Please provide all records describing, establishing, documenting, or implementing how information collected through an InterRAI assessment is used to determine whether an individual meets or does not meet ICF/IID level-of-care requirements, including:

- any algorithm, decision tree, scoring methodology, crosswalk, mapping, matrix, business rule, system rule, formula, flowchart, rubric, technical specification, desk guide, or other decision logic used in making a level-of-care determination;

- identification of the InterRAI domains, data elements, scores, scales, responses, combinations of responses, or other outputs considered in the determination;
- the relative significance, weighting, threshold, or effect, if any, assigned to those data elements or outputs;
- any rules identifying circumstances in which an assessment results in an automatic or presumptive finding that level of care is met;
- any rules identifying circumstances in which the assessment does not establish level of care and additional review, documentation, or professional judgment is required;
- any rules, standards, or guidance governing when information outside the InterRAI assessment may or must be considered in determining level of care; and
- all records explaining how the methodology was developed to operationalize Indiana's statutory, regulatory, waiver, or other requirements for ICF/IID level of care.

To the extent FSSA contends that the precise wording of an InterRAI assessment item is copyrighted and may not be disclosed, please provide the remainder of the responsive record, including the item number, identifier, domain, variable name, database field, or other non-copyrighted designation sufficient to identify which assessment data element is being used and how it affects the determination.

2. Development, Testing, and Validation of Indiana's Methodology

Please provide all records concerning the development, testing, validation, review, or approval of the methodology described above, including:

- analyses comparing level-of-care outcomes under the prior process with outcomes using InterRAI;
- pilot studies, test runs, validation studies, simulations, retrospective analyses, or other testing performed before or after implementation;
- analyses of false-positive, false-negative, denial, approval, or other outcome rates;
- analyses of whether particular assessment items, domains, scores, or response patterns predict or affect level-of-care determinations;
- records identifying individuals, contractors, consultants, vendors, or other subject-matter experts who participated in developing, testing, or reviewing the methodology; and
- recommendations, concerns, identified limitations, or proposed modifications arising from such testing or review.

3. Assessor Training and Instructions

Please provide the complete training curriculum and all instructional materials provided or made available to individuals conducting InterRAI assessments in Indiana, including:

- initial training;
- refresher or supplemental training;
- recorded trainings and associated presentation materials;
- assessor guides, desk aids, FAQs, scripts, instructions, bulletins, and technical-assistance materials;
- instructions concerning whether assessment items should be read verbatim or administered conversationally;
- instructions concerning the use of records, family or guardian information, provider information, and direct observation;
- instructions concerning pre-assessment preparation or review of existing records;
- instructions concerning how assessors should address conflicting information;
- instructions concerning whether and how narrative or explanatory information may be entered into the assessment system;
- instructions concerning age-inappropriate, developmentally inappropriate, or otherwise inapplicable questions;
- instructions concerning the appropriate duration of an assessment and whether an assessment may be divided across multiple sessions; and
- competency testing, certification requirements, minimum scores, remediation requirements, supervision requirements, or other measures used to determine whether an assessor is qualified to administer an InterRAI assessment.

For each training or curriculum, please identify, to the extent reflected in the records, the person or entity that developed or approved the material.

4. Fidelity, Quality Assurance, and Monitoring

Please provide all records concerning FSSA's monitoring of whether InterRAI assessments are being administered accurately and consistently, including:

- quality-assurance or fidelity-review protocols;
- audits or reviews of completed assessments;
- assessor-specific or case-management-entity-specific performance data;
- assessment-duration data;
- error rates or correction rates;
- records identifying common assessment errors or implementation problems;
- complaints concerning the manner in which assessments have been administered;

- corrective-action plans;
- retraining or remediation requirements;
- guidance issued in response to identified implementation problems; and
- analyses of inter-rater reliability or consistency among assessors.

Please also provide records reflecting whether FSSA has established any minimum number of supervised, reviewed, or completed assessments, or any other proficiency requirement, before an assessor is considered qualified or proficient to administer assessments independently.

5. Access to Completed Assessments and Information Used in Appeals

Please provide all policies, guidance, legal analyses, correspondence, or other records concerning an individual's or guardian's access to:

- the individual's completed InterRAI assessment;
- assessment responses and coding;
- InterRAI-generated scores, scales, flags, or other outputs;
- the specific assessment information relied upon in making an adverse level-of-care determination;
- the decision logic or methodology applied to that information; and
- records necessary to understand or challenge the accuracy of the assessment or resulting determination through an administrative appeal.

Please include records concerning any determination by FSSA regarding what completed assessment information may be disclosed to the assessed individual or guardian consistent with applicable copyright restrictions.

6. Level-of-Care Determination and Appeal Data

Please provide records sufficient to show, from implementation of the InterRAI assessment process through the date of this request:

- the number of InterRAI assessments completed for purposes of ICF/IID level-of-care determinations or redeterminations;
- the number resulting in a determination that ICF/IID level of care was met;
- the number resulting in a determination that ICF/IID level of care was not met;
- the number referred for additional or secondary review;
- the number in which an initial indication that level of care was not met was subsequently changed before issuance of a final adverse determination;
- the number of adverse level-of-care determinations appealed;

- the number of appealed determinations affirmed, reversed, withdrawn, or otherwise resolved; and
- these figures broken down, if maintained by FSSA, by assessment instrument, age group, waiver, case management entity, assessor or assessor organization, and month.

7. Implementation Concerns and Corrective Measures

Please provide records from January 1, 2026, through the date of this request concerning identified problems with administration of InterRAI assessments used for ICF/IID level-of-care determinations or redeterminations, including concerns involving:

- assessor training or competency;
- assessment accuracy or consistency;
- assessment duration;
- participation of guardians, families, providers, or other knowledgeable individuals;
- use of records, collateral information, or direct observation;
- reliance on an individual's self-report where other available information conflicts with that report;
- direct questioning of children or individuals who may be unable to reliably self-report;
- use of question-by-question or yes/no administration rather than gathering sufficient information to accurately code the assessment;
- inconsistent coding practices; or
- failure to follow applicable assessment instructions or guidance.

Please include records concerning any changes, corrective actions, retraining, guidance, or other measures FSSA has made, considered, or directed in response to identified concerns.

For purposes of this request, "FSSA" includes the Division of Disability, Aging, & Rehabilitation Services, Bureau of Disabilities Services, and any FSSA employee, contractor, consultant, or vendor maintaining responsive public records on FSSA's behalf.

Electronic production is preferred. If any responsive record contains information FSSA believes is exempt from disclosure, please redact only the exempt information and produce the remainder of the record as required by Indiana law. For each record withheld in whole or in part, please identify the statutory basis for withholding.

If the volume of responsive records is substantial, please contact me before incurring significant copying, search, or production costs so that we may discuss narrowing or prioritizing the request.

Thank you for your assistance.



Tom Crishon
Chief Legal Officer

cc: Secretary Mitch Robb, Family and Social Services Administration
Deputy Secretary Eric Miller, Family and Social Services Administration
Director Kelly Mitchell, Division of Disability, Aging, & Rehabilitation Services