



# MENTAL HEALTH BULLETIN

COMMONWEALTH OF PENNSYLVANIA

DEPARTMENT OF PUBLIC WELFARE

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OMH-98-02

SUBJECT

Licensing Compliance Prediction Instrument (LCPI) Application in the Licensing of (CRRS) Community Residential Rehabilitation Services

BY

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## SCOPE:

Community Residential Rehabilitation Services Facilities  
County MH/MR Administrators  
Pennsylvania Association of MH/MR Administrators  
Pennsylvania Association of Rehabilitation Facilities  
Pennsylvania Community Providers Association

## PURPOSE:

The purpose of this Bulletin is to implement a Licensing Compliance Prediction Instrument system for the licensing of Community Residential Rehabilitation Services facilities. The Licensing Compliance Prediction Instrument system is designed to increase the efficiency and effectiveness of the current licensing inspection protocol by refocusing the emphasis of the process. Through use of the LCPI, less time will be spent by Office of mental Health and Substance Abuse Services (OMHSAS) Licensing Inspectors conducting on-site inspections of CRRS facilities with a history of high compliance with the licensing regulations. This will allow Inspectors to spend more time providing technical assistance to CRRS facilities and conducting additional inspections of those facilities with low and moderate compliance with licensing regulations.

The Licensing Compliance Prediction Instrument (LCPI) system is intended to complement, and not replace the existing licensing inspection protocol for Community Residential Rehabilitation Services (CRRS) facilities. Use of the LCPI is not to be used as a complete substitute for annual inspections, and as such, all CRRS facilities must continue to comply with all applicable licensing regulations (e.g., PA Code Title 55, Chapter 5310) at all times.

## BACKGROUND:

Licensing indicator systems have been used extensively throughout the country with proven success. Within the Commonwealth of Pennsylvania, the Department of Public Welfare's Offices of Mental Retardation, Social Programs and Children, Youth & Families have all used and/or are implementing licensing indicator systems.

COMMENTS AND QUESTIONS REGARDING THIS BULLETIN SHOULD BE DIRECTED TO:

**Area Office of Mental Health and Substance Abuse Services**

The Licensing Compliance Prediction Instrument (LCPI) system was developed by the Department of Public Welfare (DPW) based on a statistical methodology designed for this specific purpose in 1977. For its application to CRRS, a statistical sampling of 97 Adult and 38 Children & Youth CRRS surveys were compiled during calendar year 1996 from the area offices of the Office of Mental Health and Substance Abuse Services. The individual regulatory items addressed on the 135 surveys were analyzed by computer to identify statistically significant areas of facility partial compliance and non-compliance. The noted areas of partial compliance and non-compliance were then used to form the foundation of the LCPI instruments for CRRS. Additional items were added, based on the experience of Area OMHSAS Licensing Inspectors. In addition, 5 random items are to be selected by the Inspector to apply to a licensing inspection of a CRRS program.

Through this methodology, the LCPI measures CRRS facility compliance with a small number of regulations, yet serves to predict high compliance with all Chapter 5310 regulations. That is to say, if a CRRS facility is in complete compliance with all of the regulations measured on the LCPI, we can statistically predict high facility compliance with all of the CRRS regulations.

**STATEMENT:**

The Area OMHSAS Licensing Inspector shall utilize the Licensing Compliance Prediction Instrument for annual licensing inspections of applicable Community Residential Rehabilitation Service facilities conducted on or after the effective date of this OMHSAS Bulletin. The Licensing Inspector may notify a facility in advance if an LCPI will be utilized during the on-site inspection.

The attached Licensing Compliance Prediction Instrument document provides greater detail on the instrument's application, including how and when the process will be utilized. The actual LCPI instruments are included for reference. The Adult CRRS LCPI contains 27 identified regulatory items and 5 additional spaces for random items. This is in contrast to the comprehensive Adult CRRS survey instrument, which totals 102 items. Further, the Children & Youth CRRS LCPI contains 33 regulatory items and 5 additional spaces for random items, in contrast with the comprehensive instrument normally used by Licensing Inspectors, which totals 128 items.