

Summary of Field Review Findings, April-July, 2005

I. Overview

The Seniors and People with Disabilities (SPD) Adult Support Services Coordinators' Field Review of Support Services is a key component for measuring progress toward outcomes of the Support Services Quality Assurance Plan. The review is conceptualized in two parts, one emphasizing brokerage program and service issues and another emphasizing administrative and organizational issues. Adult Support Services Team members conducted the first part of the field review July – October 2004 and have issued a report of that review. The second part of the Field Review was conducted from April 12, 2005 through July 13, 2005.

SPD intends to use the results of the Field Review, in combination with a complementary review of certain waiver-related requirements conducted by Community Developmental Disability Programs as well as consumer satisfaction information obtained by brokerages, to obtain baseline status and project benchmarks in the next phase of Support Service Quality Assurance Plan development.

Scope of Review: Support Service Team members visited each Support Services Brokerage. Prior to the visit team members selected individual records to review based upon Incident Reports and Variances received from Brokerages. The team reviewed 156 case records across 9 brokerages. All personnel files at each brokerage were reviewed. Additionally written Brokerage policies and procedures pertaining to the QA component areas were reviewed. Brokerage Quality Assurance plans and Customer Satisfaction data were also reviewed and analyzed.

Overall methodology: Each regionally assigned Adult Support Services Team member visited their assigned brokerages to review individual files and program records on site. Adult Support Services Team members all used professional judgment and experience to evaluate from those documents how effectively and completely SPD expectations for the administrative and operational elements listed on the Support Services Field Review Criteria for Administrative Review Checklist (Attachment #1) had been met. Team members recorded findings on the Support Services Field Review Checklist: Administrative. Brokerage staff qualifications and

training were recorded on the Field Review Brokerage Staff Qualifications Checklist (Attachment #2) All documents were gathered and summarized to create performance scores for each brokerage---as well as a statewide average---for each of the review components listed below.

II. Report of Findings

A. Assessment of risk and individual safety planning.

1. Relationship with Support Services Quality Assurance Plan:

- a) Basic Assurance 1: Waiver Participant Health and Welfare
- b) Quality Assurance Plan Goal: Individuals in home and community-based waiver services are safe and secure in their homes and communities taking into account their informed and expressed choices.
- c) QA Plan Outcome 1.1.2: Individuals are protected from abuse.

2. Performance Standards:

Incident reports that rise to the level of abuse are submitted to County Developmental Disability Programs as potential Protective Service Investigations. Brokerages follow up on issues identified in Incident Reports.

Documents Reviewed: Customer Goal Survey, Individual Support Plan, Progress Notes, Correspondence and Incident Reports, Brokerage Policies and Procedures.

- #### 3. Findings:
- 1 of 156 records reviewed contained an incident that was not reported to the County Developmental Disability Program as a potential Protective Service Investigation.
- 19 (12%) of the 156 records reviewed did not have all elements required to meet the performance standard for Brokerage follow up. The reasons most often noted included the need for:

- Clear documentation of follow up on issues identified in incident reports.

Best practices identified by the review included:

- Individual Support Plans amended to reflect identified support needs.
- Clear, legible and consistent case notes.
- Ongoing communication between Brokerage and County Developmental Disability Program regarding Protective Service Investigations.

B. Timeliness of plan development and implementation.

1. Relationship with Support Services Quality Assurance Plan:

- a) Basic Assurance 1: Waiver Participant Health and Welfare
- b) Quality Assurance Plan Goal: Individuals in home and community-based waiver services are safe and secure in their homes and communities taking into account their informed and expressed choices.
- c) QA Plan Outcome 1.4.2: Individuals have timely access to waiver services.

2. Performance Standard: Services begin in accordance with dates on Rule Variance Request Form. Brokerage has a process for ensuring plans are developed within 90 days. Brokerage has a process for submitting Rule Variance Request Forms prior to plan lapsing.

Documents Reviewed: Completed Rule Variance Request Form, Individual Support Plan, Progress Notes, Correspondence, Brokerage Policies and Procedures.

3. Findings: 12 (20%) of the 60 records reviewed did not have all elements required to meet the performance standard. The 60 (approximately 1.5% of all individuals ever enrolled into Support

Services) records reviewed were for instances where brokerages requested a rule variance because plan timelines could not be met. The reasons most often noted included the need for:

- Documenting customer choices regarding availability for planning meetings.
- Delays in contact with customer after initial enrollment or prior to annual plan renewal.

Best practices identified by the review included:

- Internal monitoring of timelines for plan development
- Timely variance submission
- For renewals, mid plan year plan amendments when needs or preferences change.

C. Provider qualifications.

1. Relationship with Support Services Quality Assurance Plan:

a) Basic Assurance 3: Services Provided by Qualified Providers

b) Quality Assurance Plan Goal: All agency and individual providers of home and community-based waiver services possess the requisite skills, competencies and qualifications to support participants effectively.

c) QA Plan Outcome 3.1.1: Individual and agency providers are qualified to provide waiver services.

2. Performance Standard: Providers not meeting qualification standards are sanctioned per Oregon Administrative Rule 411-340-0130 (9)

Documents Reviewed: Brokerage Policies and Procedures,
Brokerage Records of Provider Sanctioning

- a) **Findings:** Only one case of provider sanctioning was reported by a brokerage. Provider did not appeal this action. No further analysis done. Future reviews will revise the methodology used for this

component. This performance standard will be folded into the ISP field Review QA component for provider qualifications.

Best practices identified by the review included:

- Customers supported to terminate providers who were no longer qualified or who were no longer authorized to provide supports.
- Educating customers on employer/employee roles.
- Maintaining and disseminating current information on Labor laws and issues.

D. Brokerage Staff Training.

1. Relationship with Support Services Quality Assurance Plan:

- a) Basic Assurance 3: Services Provided by Qualified Providers
- b) Quality Assurance Plan Goal: All agency and individual providers of home and community-based waiver services possess the requisite skills, competencies and qualifications to support participants effectively.
- c) QA Plan Outcome 3.2.1: Staff of Support Service Brokerages receive training to provide waiver services.

2. Performance Standard: Brokerage Personal Agents receive training per Oregon administrative Rule OAR 411-340-0150:

- Principles of self- determination,
- Person-centered planning processes,
- Identification and use of alternative support resources,
- Fiscal intermediary functions,
- Basic employer/employee roles and responsibilities,

- Developing new resources,
- Major public health and welfare benefits,
- Constructing and adjusting individualized support budgets,
- Assisting individuals to judge and improve quality of personal supports

Documents Reviewed: Brokerage Policies and Procedures, Brokerage Personal Agent training records.

3. Findings: 12% of the records reviewed did not have all elements required to meet the performance standard. The training area most often not documented were Fiscal Intermediary Functions. Overall, the reasons most often noted for not meeting the performance standard included the need for:

- Consistent documentation of trainings attended
- Completed Basic Orientation checklists

Best practices identified by the review included:

- Administrative maintenance of training records

E. Brokerage Staff qualifications.

1. Relationship with Support Services Quality Assurance Plan:

- a) Basic Assurance 3: Services Provided by Qualified Providers
- b) Quality Assurance Plan Goal: All agency and individual providers of home and community-based waiver services possess the requisite skills, competencies and qualifications to support participants effectively.
- c) QA Plan Outcome 3.2.2: Staff of Support Service Brokerages are qualified to provide waiver services.

2. Performance Standard: Brokerage staffs are qualified per OAR 411-340-0070 and 411-340-0150

Documents Reviewed: Brokerage Policies and Procedures, Brokerage Personnel records.

3. Findings: 33% of the records reviewed of all Brokerage staff (Personal Agents, Executive Directors, Clerical and Fiscal staff) did not have all elements required to meet the performance standard. 27% of records of Personal Agents only did not have all elements required to meet the performance standard. The reasons most often noted included the need for:

- Documentation of References prior to hire
- Signed and Completed I-9s

F. Assessment of risk and individual safety planning.

1. Relationship with Support Services Quality Assurance Plan:

- a) Basic Assurance 1: Waiver Participant Health and Welfare
- b) Quality Assurance Plan Goal: Individuals in home and community-based waiver services are safe and secure in their homes and communities taking into account their informed and expressed choices.
- c) QA Plan Outcome 1.4.1: Individuals are satisfied with plans and outcomes

2. Performance Standards:

- Individuals receiving waiver services report satisfaction with the services they receive

Documents Reviewed: Brokerage Customer Satisfaction data, Brokerage Quality Assurance Plans, Brokerage Policies and Procedures.

3. Findings: 85% of the individuals who responded to the statement “I am

happy with the supports and services I get” on the 2004 Customer Satisfaction Survey chose “Yes” as their response. Other responses were “They’re Okay” 13% and “No” 2%.

Comments provided by respondents were overwhelmingly positive,

Best practices identified by the review included:

- Brokerage Policy Oversight Group reviews Customer Satisfaction Data
- Brokerage includes Customer satisfaction in their Quality Assurance Plan.

III. Next Steps

- Baseline data has been ascertained and future Benchmarks (see Attachment #3) have been established.
- Each brokerage will work with its State Liaison from the review team to go over the specific outcomes and results from its individual review.
- Through ongoing interaction with Brokerage Executive Directors, State staff will assess and monitor progress towards meeting standards and benchmarks.
- Field Reviews will continue. Field Reviews related to Individual Support Plans will continue on a regular basis, with each brokerage experiencing review of various aspects of their services at least once per year.
- Components reviewed during the Administrative Field Review will be combined with the Individual Support Plan Review resulting in one comprehensive review per year.
 - This change is practical, resulting in less frequent site visits and therefore less disruption to the day-to-day work of the brokerage, as well as functional, since brokerage best practices and areas needing improvement are similar in both types of reviews.

- Additionally, we noted that review components overlapped and we found no benefit is separating, for example, review of Incident Reports (Administrative) and review of how Brokerages respond to individual risk and safety issues (Individual support Plan).
- Overall, the single most influential factor is how well documentation is initiated and maintained at the brokerage level. This holds true across individual customer files, service provider files and brokerage personnel files. Training (Effective Goal Writing, Protective Services Investigations in In-Home settings) has been provided to clarify expectations in this area and brokerages have available a PowerPoint presentation on Writing Case Notes that is used in Basic Case Management training.
- The next scheduled reviews are certification reviews conducted by the Seniors and People with Disabilities Office of Licensing and Quality Of Care from October 2005 through March 2006. Support Services team members will participate in these reviews. Brokerage directors have expressed their preference in having the comprehensive Field Review in addition to the certification review, even when this results in two reviews per year.
- The next Support Services Field Reviews will begin in 2006. At that time, the emphasis of our analysis will be on checking our initial conclusions regarding best practices and areas needing improvement.

Attachment # 1

**Support Services QA Field Review
Discovery and Criteria for Administrative Review Checklist**

QA Component	Discovery	Criteria for meeting standard
1.1.2 Evaluation and analysis of 100% of unusual incident reports.	<ul style="list-style-type: none"> • Review Incident reports as submitted by brokerages to SPD. • Interview Brokerage Directors and PAs regarding circumstances necessitating Incident reports 	<u>Individuals are protected from abuse</u> <ul style="list-style-type: none"> • Incident reports that rise to the level of abuse are submitted as PSIs. • Brokerages follow up on issue identified in IRs.
1.4.2 Review rule variance requests relating to proposed delay in required plan development timelines.	<ul style="list-style-type: none"> • Review variances at SPD related to time delay submitted by brokerages to SPD • Interview Brokerage Directors and PAs regarding timelines and protocol for variances related to time delay. 	<u>Individuals have timely access to waiver services</u> <ul style="list-style-type: none"> • Review brokerage process and timelines for ensuring plans are developed within 90 days.
2.4.1 Evaluation and analysis of consumer satisfaction survey response.	<ul style="list-style-type: none"> • Review data submitted by brokerages. • Interview Brokerage Directors regarding Process for consumer satisfaction surveys. 	<u>Individuals are satisfied with plans and outcomes.</u>

QA Component	Discovery	Criteria for meeting standard
3. 1.1 Report of provider sanctioning – causes and actions taken	<ul style="list-style-type: none"> • Interview Brokerage Directors regarding providers sanctions and process to arrive at sanctioning. 	<u>Providers are qualified to provide waiver services.</u>
3. 2.1 Certification and Field Review Team results of training provided of Support Service Brokerage staff.	<ul style="list-style-type: none"> • Interview Brokerage Directors regarding training curriculum • Review training records. 	<u>Brokerage Staff receive training to provide waiver services.</u>
3.2.2 Certification and Field Review Team findings re: qualifications of Support Services brokerage Staff.	<ul style="list-style-type: none"> • Review Brokerage personnel files. 	<u>Brokerage staff are qualified per OAR 411-340-0150 (5)</u>

Attachment #2 Field Review Brokerage Staff Qualifications Checklist

Brokerage: _____ Date: _____

Staff Name: _____ Position: _____

- Personnel files and qualifications records. Brokerages and Provider Organizations must maintain **up-to-date written position descriptions** for all staff as well as a file available to the Department or CDDP for inspection that includes written documentation of the following for each staff person:
 - Reference checks** and confirmation of qualifications prior to hire;
 - Written documentation of a **criminal record clearance** by the Department;
 - Satisfactory completion of **basic orientation**, including instructions for mandatory abuse reporting and training specific to developmental disabilities and skills required to carry out assigned work if the employee is to provide direct assistance to individuals;
 - Written documentation of employee notification of **mandatory abuse reporter** status;
 - Written documentation of any substantiated **abuse allegations**;
 - Written documentation of any **grievances** filed against the staff person and the results of the grievance process, including, if any, disciplinary action; and
 - Legal U.S. worker status.**
- General staff qualifications.** Any employee providing direct assistance to individuals:
 - must be at least **18 years of age** and
 - capable of performing the duties of the job as described in a current job description **signed and dated** by the employee.

Personal Agent

- An undergraduate degree in a human services field and at least one year experience in the area of developmental disabilities;
- or** (b) Five years of equivalent training and work experience related to developmental disabilities.
- (c) Knowledge of the public service system for developmental disability services in Oregon.

Personal Agent training. The Brokerage must provide or arrange for Personal Agents to receive training needed to provide or arrange for Brokerage services, including, but not limited to

- principles of self- determination,
- person-centered planning processes,
- identification and use of alternative support resources,
- fiscal intermediary functions,
- basic employer/employee roles and responsibilities,
- developing new resources,
- major public health and welfare benefits,
- constructing and adjusting individualized support budgets,
- assisting individuals to judge and improve quality of personal supports.

Attachment #3 Support Services Field Review Proposed Administrative Benchmarks

	Incident Report Follow Up	Timeliness of Plans	Customer Satisfaction	Staff Qualifications	Personal Agent Training
2005	88%	80%	85%	67%	88%
2006	100%	90%	85%	85%	90%
2007	100%	95%	90%	95%	95%