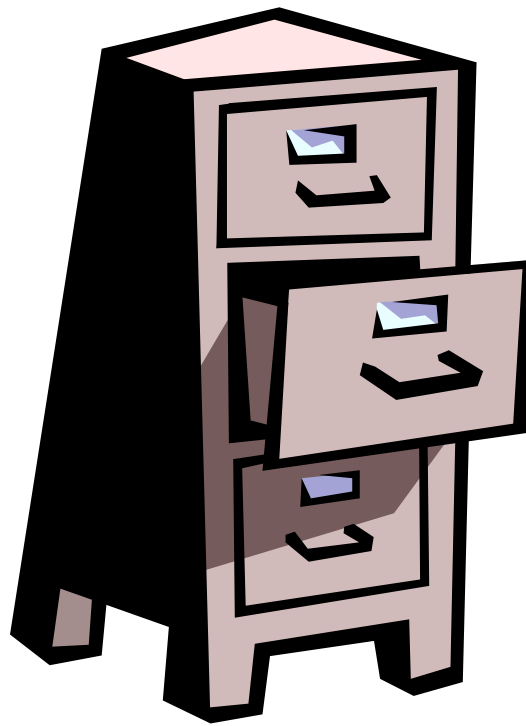


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# Local Quality Assurance Resource Manual

## Chapter 1

### Introduction: Local Quality Assurance Program



NOTE: This Resource Manual is a product of the Research and Evaluation contract between the University of Oregon's Educational and Community Supports unit within the College of Education and the Department of Human Services, Seniors and People with Disabilities, State of Oregon (Agreement # 108857, Amendment 1). This chapter presents some of the quality assurance program requirements, as well as items that are not specifically required but offered as suggestions or examples. All CDDPs must remember that their role is to implement a Quality Assurance program that supports the State's current Quality Assurance Plan. The Resource Manual includes requirements for Quality Assurance Programs that are current as of June 2005. Because Administrative Rules and Contract requirements change, CDDPs should always check for and apply more current rules and contracts developed after the publication of this workbook.

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# Introduction: Local Quality Assurance Program

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## INTRODUCTION

### LOCAL QUALITY ASSURANCE PROGRAM

**Objective:** Provide an overview of the requirements for county quality assurance programs and this Resource Manual.

**Requirements:** Both the Oregon Administrative Rule for CDDPs **411-320-40 Community Developmental Disability Program Responsibilities (08/03/04)** and the State's Quality Assurance Plan require a County Quality Assurance Program. The complete OAR section on Local Quality Assurance Program is included at the end of this chapter.

### BACKGROUND INFORMATION ON LOCAL QUALITY PROGRAMS



In applying for a waiver to allow the State to use federal Medicaid funds to support particular services, the State must make certain assurances. The State described their plan to meet these assurances in the State's "Quality Assurance Plan"—which is updated periodically. Once the waiver is granted, the State must document to the federal government that these assurances are being fulfilled. Having a system of local Quality Assurance Programs—including the work accomplished by local Quality Assurance Coordinators and Quality Assurance Committees—is one way that the State has to demonstrate performance on the assurances. However, while Seniors and People with Disabilities (SPD) must do things to meet requirements to use federal Medicaid funds, the expectations related to Quality Assurance included in the Oregon Administrative Rules are that ALL services, not just waiver services, are included in the local Quality Assurance program.

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## ASSURANCES

The required assurances are the basis for the six goals — of the SPD Quality Assurance Plan:

- 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.
- Home and community-based waiver services and supports are planned and effectively implemented in accordance with each participant's unique needs, expressed preferences and decisions concerning his or her life in the community.
- All agency and individual providers of home and community-based waiver services possess the requisite skills, competencies and qualifications to support participants effectively.
- Each individual's need and eligibility for home and community-based waiver services are assessed and determined promptly and accurately.
- The Department carries out its duties and responsibilities as Oregon's single state Medicaid Agency with regard to home and community-based waiver services.
- The Department maintains, and participates in, systems and procedures that promote financial accountability at all home and community-based waiver service levels.



Each of these goals also has from one to six desired outcomes. For example, there are two Desired Outcomes related to the Goal of Determining Level of Care Need:

1. Level of care assessments are completed accurately and on time.
2. Level of care assessments are completed by qualified persons.

See Chapter 2 on Local Plans for a full list of desired outcomes.

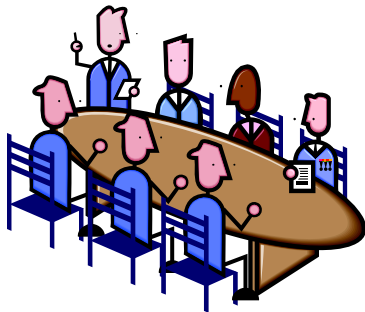
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## **QUALITY PROGRAM ELEMENTS**

Seniors and People with Disabilities expects that Community Developmental Disability Programs (CDDPs) will perform activities that directly support the Department's goals and desired outcomes. In addition, they expect CDDPs to demonstrate management of service quality by evaluating performance information and adjusting practice as indicated by the data. Thus, the County Quality Assurance (QA) Program must have at least the following major elements:

- 1) A written **Quality Assurance Plan** that is updated at least annually that describes activities and Quality Components undertaken by the CDDP to assure quality. Chapter 2 in this Resource Manual focuses on the development and maintenance of the Local Quality Assurance Plan.
- 2) **Policies and procedures** that guide the implementation of the plan. The following section provides information and a sample of policies and procedures.
- 3) **Quality Assurance staff** who meet minimum qualifications in the Rule (or exceptions approved by SPD).



- 4) A **Quality Assurance Committee**, with specified membership, that reviews and comments on several specified items. Chapter 3 offers suggestions on forming and working with local Quality Assurance Committees.
- 5) **Quality Components** through which CDDPs observe and record aspects of service quality. These components are discussed briefly below, and in more depth in Chapter 2 on Local Quality Plans.
- 6) **Records** of data and information, conclusions and recommendations, findings, corrective actions, and the impact of corrective actions, reviewed at a CDDP policy level. Chapter 4 focuses on Compiling, Analyzing and Presenting Data.
- 7) **Actions taken to improve performance** as a result of information reviewed. This may include corrective actions identified through licensing or certification reviews, follow-up on SERT incidents, or other sources. However, they also may include larger systems projects, in which the CDDP staff or QA Committee studies an issue or pattern that they have observed, and determines how to improve performance in that area. Chapter 6 provides some guidelines for carrying out a systematic quality improvement project.

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The *Critical Questions Workbook*, a separate manual also available through SPD, offers suggestions for identifying appropriate measures, as well as working with Committees to review data and define improvement strategies.

## **POLICIES AND PROCEDURES**

An important element of the Local Quality Program is the presence of a set of CDDP policies and procedures needed to implement the local QA plan. Policies should define the overall purpose and scope of a particular aspect of the Quality Program, and should follow the general format of other CDDP policies governing the program. Procedures, however, need to be much more specific.



Counties vary widely in how they are developing policies. At least one county has a policy statement on Quality Assurance that simply reads, “The XYZ County Developmental Disabilities Program will implement and maintain a local quality assurance system in accordance with OAR 411-320-0040, 9(a) through (f).” Other counties have much more detail included in their policies.

Procedures—also sometimes referred to as “protocols”—need to clearly define how CDDP staff members are to carry out a specific quality assurance activity. While the specific format and content of a written procedure varies, a procedure often includes at least some of the following pieces:

- The purpose of the task
- Who is responsible to carry out the task
- How often it is to be carried out
- Guidelines for doing it
- The specific steps clearly described
- Data that are to be collected
- Procedures for compiling and reporting data
- Forms that are to be used
- Documentation that must be maintained and where that is located.



**SAMPLE POLICY FORMAT**

Lane County Developmental Disabilities Program

**Subject:** Quality Assurance Policy and Procedures

**Purpose:** To assure that Lane County Developmental Disabilities Program (Lane DDP) will implement and maintain a local quality assurance system in accordance with OAR 411-320-0040, 9(a) through (f).

**Policy:** Lane DDP must implement and maintain a local quality assurance system, which will:

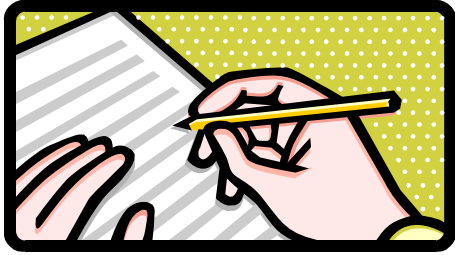
- A. Provide direct support to the Department in implementation of its Quality Plan; and
- B. Work towards generally improving the quality of services by evaluating service delivery and outcomes and adjusting local planning and performance where needed; and
- C. Include all County contracted funded disability services provided within the county, as well as QA activities related to SPD direct contract services as directed by the Department; and
- D. Include, at a minimum, the quality indicators and activities that are to be carried out at the local level according to the most recent edition of the Department’s Quality Plan.

Lane DDP will develop and implement a local Quality Plan and an Annual QA Work Plan, which will:

- A. Describe the major quality assurance activities to be performed by the county. The Annual QA Work Plan describes the major quality assurance activities and quality indicators to be performed in a given calendar year, including the timelines for each of those activities.
- B. Be updated at least annually and whenever significant changes are made. Each year a new Annual QA Work Plan will be developed to identify and prioritize which quality assurance activities will be performed.
- C. The Quality Plan with subsequent updates, and the Annual QA Work Plan will be reviewed by the local quality assurance committee
- D. Lane DDP will maintain data and information documenting implementation of the Quality Plan and the Annual QA Work Plan, and any recommendations that have been drawn from analysis of the information gathered during the implementation of the plans.

<b>Responsibility</b>	<b>Activity</b>
<b>QA Coordinator</b>	1. Will facilitate Lane DDP’s quality assurance process through activities such as the following: (a) Participate in Department sponsored activities..... (b) Draft the Lane DDP Quality Plan and QA Work Plan.... (c) Work with the Lane DDP management team to develop policies and procedures to implement the local Quality Plan and QA Work Plan, as needed (d)...etc
<b>Lane DDP Quality Assurance Committee</b>	1. Committee membership includes....etc. 2. Activities of the committee will include....etc.
<b>Lane DDP Management Team</b>	Lane DDP will take management actions to improve service quality, or to correct deficiencies and poor performance when deficiencies and substandard performance is found in Department-funded DD services that are operated within Lane County. These situations may be resolved through... etc.

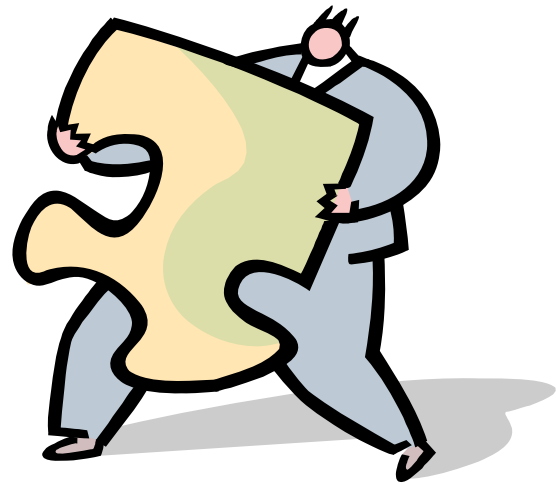
Reference: OAR 411-320-0040



It is useful to attach to the written procedure copies of necessary forms. Some organizations also like to attach a flowchart depicting the process steps visually. All of these parts are not usually needed in a procedure, but a CDDP should use the pieces that help to clearly define how a quality assurance activity will be carried out.

Written procedures ensure that the same methods are used across time when carrying out a quality assurance activity, and that the same methods are used when more than one person is involved with the activity. In large part, “quality assurance” means “measuring quality.” Thus, using a good, reliable method of measuring quality leads to better results, that is, greater accuracy in the picture of quality that the activity will yield. It also supports comparing results across time, to determine if actions taken to improve performance have yielded the desired changes. If the methods used to carry out the quality assurance activity change from one instance to the next, then it is difficult to know if a change in the observed results is due to the change in the quality assurance procedure, or an actual change in the target environment. On the following page is a sample procedure for distributing customer satisfaction surveys related to the intake and eligibility determination process.

Each CDDP may choose the particular format, style, and required specificity for written procedures for quality assurance activities. However, it is useful to have a relatively standard format, with standard items that need to be addressed.





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## SAMPLE PROCEDURE

### Lane County Developmental Disabilities Services

Protocol: Satisfaction Survey for Intake/Eligibility Determination Services

July, 2005

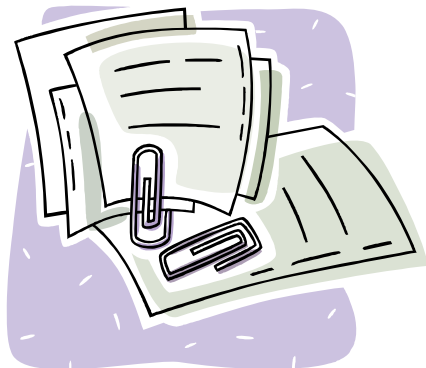
**This document defines the standardized procedures for distributing and compiling the satisfaction survey for intake/eligibility determination services**

<b>Survey Purpose</b>	<ul style="list-style-type: none"><li>• To gather input from community members who apply for services on their satisfaction with various aspects of the process.</li><li>• The data will be compiled, analyzed, and used for targeting improvement projects for intake/eligibility determination services, and for measuring whether resulting changes made actually resulted in improvements in customer satisfaction.</li></ul>
<b>Survey Description</b>	<ul style="list-style-type: none"><li>• The survey requests feedback on their satisfaction with their experience in going through the process.</li></ul>
<b>To Whom?</b>	<ul style="list-style-type: none"><li>• Distribute the survey to 100% of individuals who have completed the application process and are sent an eligibility determination letter.</li><li>• <b>Do not</b> distribute a survey to an individual who is still active in the application process.</li></ul>
<b>When?</b>	<ul style="list-style-type: none"><li>• Include one copy of the survey in the same envelope with the eligibility determination letter.</li></ul>
<b>By Whom?</b>	<ul style="list-style-type: none"><li>• The Intake Worker or staff member who prepares the eligibility determination letter for mailing.</li></ul>
<b>What Survey?</b>	<ul style="list-style-type: none"><li>• The Satisfaction Survey for Intake/Eligibility Determination Services</li><li>• Use <b>light green paper</b> for individuals who were determined to be eligible (green is for “go”)</li><li>• Use <b>salmon or yellow paper</b> for individuals who were determined to be ineligible.</li></ul>
<b>Then what?</b>	<ul style="list-style-type: none"><li>• Each day, turn in returned surveys to Tanya, who will arrange for compiling them.</li></ul>
<b>Compiling data</b>	<ul style="list-style-type: none"><li>• Support staff will compile and assist in preparing data for reporting.</li></ul>
<b>Reporting Results</b>	<ul style="list-style-type: none"><li>• At least initially, we will prepare quarterly reports of the data. If the data stabilize, we may shift to a report format on a different time schedule.</li></ul>

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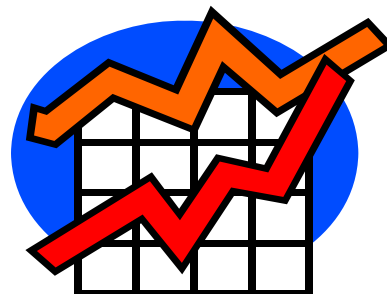
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## QUALITY COMPONENTS



Each Community Development Disability Program (CDDP) is expected to maintain a set of Quality Assurance processes (referred to as “Quality Components”) and documentation related to aspects of each of these Goals and Desired Outcomes. For each component, there are two basic sets of information that a CDDP should maintain:

- 1) Information that describes the extent to which the expected local CDDP Quality Assurance **processes** are in place and functioning to standards.
- 2) Information about the **results** discovered through those Quality Assurance process, i.e., how well our county as a whole is performing related to the Goal and its Desired Outcomes.



Thus, the Quality Assurance Committee, the Quality Assurance Coordinator, and/or other CDDP staff will need to review information about both the status of CDDP processes and the picture of local performance that those processes yield. In each local area, Quality Assurance Coordinators may decide to do this in a different way.

Quality Components include processes such as service coordinator monitoring, SERT, individual file reviews, licensing and certification reviews. Some components are required of CDDPs on an ongoing basis; others are required more intermittently, or as requested by SPD. The following table includes a full list of Quality Components.

<b>Table. Quality Assurance Components</b>
Licensing, certification reviews
SERT
Service coordinator monitoring, inc. annual plan reviews (24-hour res., foster home)
OIT and local investigator information re protective services investigations
PSI investigator training, technical assistance, mentoring
Death reports
Records of individual complaints, inc. contested case as well as other types
Service coordinator and provider training surveys
Individual file reviews (re rights, plans, etc.)
Annual sample file review using HCB Waiver Service Review checklist
Service coordinator plan implementation reviews (Family Support, In-Home Comp)
Employment Outcome reports
CDDP Records (e.g. service coordinator qualifications, training; actions re QA)
Records of provider sanctions and contested case hearings
Direct Care staff turnover records
Special training project records
Records of foster provider training and testing
Individual/family satisfaction surveys
Audits, financial reports, special inquiries/investigations re state or local operations

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## **ROLES AND RESPONSIBILITIES OF LOCAL QA COORDINATOR**

Both the OARs and the State QA Plan include information about the role of the Local QA Coordinator. In the 2003-05 biennium, CDDPs received funds from SPD to support the work required by a QA Coordinator. Generally, this must be a full-time person of appropriate rank who meets the minimum qualifications described in the OAR. Alternatives must be negotiated with SPD.

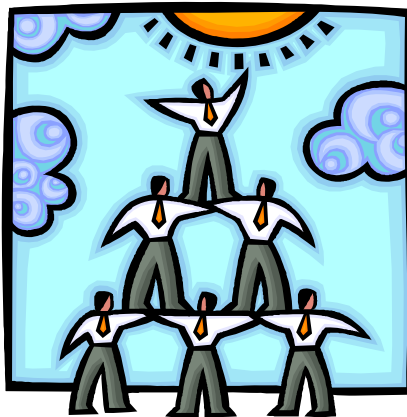
The role of the local QA Coordinator is central to the success of the local quality program. It is the responsibility of the QA Coordinator to ensure that each of the elements of the QA program is in place, either by drafting elements for review, or working with others to design, develop or maintain the specified systems. The QA Coordinator oversees the performance of Quality Components in monitoring the implementation of the local QA Plan, ensuring that needed records are maintained and actions taken to improve performance.



## **QUALITY ASSURANCE RESOURCES**

There are many fine resources related to planning and implementing procedures related to quality assurance and quality improvement. DHS has established a website with links to some of these. Because the website is updated periodically, you should check it occasionally for new information and resources. The address is:

<http://www/Oregon.gov/DHS/SPD/QA/home.shtm>



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## ORGANIZATION AND STRUCTURE OF THIS LOCAL QUALITY ASSURANCE RESOURCE MANUAL

This Resource Manual is designed to support the work of Quality Assurance Coordinators in developing and improving the major elements of a local Quality Assurance Program. Each chapter follows a similar outline—Each begins with describing the chapter **Objectives** and applicable **Requirements** drawn from the CDDP OARs. The rules included are those files August 3, 2004. Be careful to check the DHS website for updates or changes to the rules. The remainder of the chapter offers **Guidelines and Suggestions** for meeting those requirements. Examples are either built into the chapter or as an appendix at the end of each chapter.

The Resource Manual is divided into six chapters, as follows:

Chapter	Title	Description
1	Introduction: Local Quality Assurance Programs	Overview of elements of local Quality Assurance programs
2	Local Quality Plans	Guidelines for content and format of CDDP Quality plans and organizing work for carrying out the plan.
3	Quality Assurance Committees	Suggestions for how to structure and work with local Quality Assurance Committees, including membership and meeting formats.
4	Compiling, Analyzing, & Presenting Data	Suggestions for building information systems and preparing data for presentation.
5	Measuring Customer Satisfaction	An overview of methods for assessing customer satisfaction, including sample surveys and protocols
6	Improving Quality	An overview of Quality Management, including using corrective actions and continuous improvement.
	Appendix	Glossary

### SUMMARY

Assuring quality is important work. You have a critical role in making sure that Oregon continues to meet its promises in providing high quality services to its citizens with developmental disabilities, and therefore continues to receive federal support to do so. This Resource Manual is offered to help you to fulfill this role.

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## APPENDIX

### **411-320-40 Community Developmental Disability Program Responsibilities (08/03/04)**

This excerpt from the CDDP rule is current as of May 2005. Be sure to check the DHS website for any changes and updates. That website is:

<http://www.dhs.state.or.us/policy/spd/alpha.htm>

(Sections deleted)

- (9) *Local quality assurance program. Each CDDP must implement and maintain a local quality assurance system in accordance with these rules.*
- (a) *QA system purpose and scope. The local quality assurance system will:*
- (A) *Ensure the development and implementation of a quality assurance system by:*
- (i) *Providing direct support to DHS in implementation of its quality assurance (QA) plan; and*
- (ii) *Generally improving the quality of services by evaluating service delivery and outcomes and adjusting local planning and performance where needed.*
- (B) *Include all Department funded developmental disability services provided within the county, including services that are operated or subcontracted by the CDDP, state operated community programs for developmental disabilities; and those developmental disability services operating under a direct contract with the Department; and*
- (C) *Include, at a minimum, the quality indicators and all activities that are to be carried out at the local level according to the most recent edition of the Department's Quality Assurance Plan for Developmental Disability Services (Department's QA Plan).*
- (b) *Quality assurance activities. The CDDP will perform quality assurance activities that include, but are not limited to, the following:*

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- (A) *Develop and maintain a local QA plan that describes the major activities to be performed by the CDDP, including the timelines for each of those activities.*
    - (i) *These activities must include all activities that are to be carried out at the local level according to the most current edition of the Department's QA plan.*
    - (ii) *The local QA plan must be updated whenever changes are made, but at least annually.*
  - (B) *Develop CDDP policies and procedures needed to implement the local QA plan.*
  - (C) *Implement the activities defined in the local QA plan, including the timely delivery of data and information to the Department as required in the Department's QA plan.*
  - (D) *Maintain data and information that has been gathered through implementation of the local QA plan.*
  - (E) *Maintain a record of conclusions and recommendations that have been drawn from analysis of the information gathered.*
  - (F) *Take management actions as needed to improve service quality or to correct deficiencies; and*
  - (G) *Maintain records that document:*
    - (i) *The CDDP's performance of the activities described in the local QA plan.*
    - (ii) *The CDDP's performance measured against statewide performance requirements as specified in the Department's QA Plan.*
    - (iii) *The CDDP's findings, corrective actions and the impact of its corrective actions that have been reviewed at a policy level within the CDDP's department structure within the County; and*
    - (iv) *The timely submission of information to the Department, as required in the Department's QA Plan.*

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- (c) *Performance requirements. The CDDP will meet or exceed the minimum performance requirements established for all CDDP's in the Department's QA Plan.*
    - (A) *The CDDP will collect and analyze information concerning performance of the activities represented in OAR 411-0320-0040(9)(a)(A), in the manner specified in the Department's QA Plan.*
    - (B) *Data concerning the CDDP's performance will be sent to the Department in the format and within the timelines established by the Department.*
    - (C) *The CDDP must cooperate in all reviews, by the Department or its designee, of CDDP performance in accordance with these rules.*
    - (D) *Records that document the CDDP's performance will be maintained and be made available to the Department or its designee, for audit purposes, upon request.*
  - (d) *Corrective actions. The CDDP will act to correct deficiencies and poor performance through management actions.*
    - (A) *Deficiencies and substandard performance found in services that are operated or subcontracted by the county will be resolved through direct action by the CDDP.*
    - (B) *Deficiencies and substandard performance found in services that are operated by the state or through direct state contracts will be resolved through collaboration with the Department.*
    - (C) *Deficiencies and substandard performance found in services provided through a Region will be resolved through collaboration between the regional management entity and the affected CDDPs.*
  - (e) *Local quality assurance committee. The CDDP will utilize a committee of stakeholders to assist in the development and review of local quality assurance plans and activities.*



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- (A) *Committee membership will include persons representing self-advocates, service providers, advocates, family members of individuals with developmental disabilities and Services Coordinators.*
  - (B) *Activities of the committee will include:*
    - (i) *Providing review and comment on CDDP plans for local QA plan activities;*
    - (ii) *Providing review and comment on data gathering instruments and methods; and*
    - (iii) *Providing review and comment on the results of information gathered by the CDDP and the effectiveness of corrective actions.*
- (f) *Quality assurance resources. The CDDP must allocate resources to implement the local QA plan.*
- (A) *Individuals employed to carry out implementation activities will have the training and education, as well as the rank or classification within the organization that is appropriate for the tasks assigned.*
  - (B) *One position within the CDDP will be designated as the QA Coordinator. The minimum requirements must include:*
    - (i) *The QA Coordinator must be a full time CDDP employee, unless prior approval of an alternative plan has been obtained from the Department;*
    - (ii) *At a minimum the position must meet the qualifications for a Services Coordinator for individual with developmental disabilities as described in OAR 411-320-0030(3)(b)(A)(i-iv);*
    - (iii) *The purpose of the QA Coordinator is to facilitate the CDDP's quality assurance process through activities such as the following:*
      - (I) *Participate in Department sponsored activities such as planning and training that are intended to*

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*assist in development and implementation of Department's QA plan requirements, compliance monitoring procedures, corrective action plans and other similar activities.*

- (II) Draft local quality assurance plans and procedures that both meet QA requirements established by the Department and consider the unique organizational structure, policies and procedures of the CDDP.*
- (III) Keep CDDP administrative staff informed concerning new or changing requirements being considered by the Department.*
- (IV) Coordinate activities within the CDDP such as preparation of materials and training of county staff as needed to implement the local QA plan.*
- (V) Monitor the implementation of the local QA plan to determine the level of county compliance with Department requirements. Keep CDDP administrative staff informed about compliance issues and need for corrective actions.*
- (VI) Coordinate delivery of information requested by the Department, such as the Serious Event Review Team (SERT).*
- (VII) Assure record systems to store information and document activities are established and maintained.*
- (VIII) Perform abuse investigations, if approved by the Department as part of the CDDP's QA plan.*