



June 27, 2017

CDDO Peer Review of

East Central Kansas AAA-CDDO

Review Team:

Colin Rork, KDADS

Melissa McDaniel, KDADS

Linda Young, KDADS

Sara Pearson, Hetlinger CDDO

Quinta Avance, CSP Volunteer

# **CDDO REVIEW REPORT SUMMARY OF FINDINGS**

## **East Central Kansas AAA-CDDO Peer Review**

**June 27, 2017**

### **1. GENERAL COMMENTS**

East Central Kansas AAA-CDDO Peer Review was held on Tuesday, June 27, 2017 at 9:00 a.m. Prior to June 27th, East Central Kansas AAA-CDDO's last Peer Review was several years ago. Amber Vogeler recently became East Central Kansas AAA-CDDO Coordinator and was the primary point of contact for KDADS throughout the review process. All information requested prior to review and onsite were received. The review team would like to thank the CDDO for their flexibility and availability throughout the process.

### **2. IDENTIFIED STRENGTHS**

1. **BASIS** – KDADS requested a random sample of 15 individuals who had BASIS assessments within the last year. Evidence shows that the CDDO has no problem entering assessments into KAMIS timely. All of the sampled assessments were entered within agreed upon timeframe, if not prior to. The CDDO provides all parties involved notifications two months prior to BASIS assessments. Through an on-site interview with the BASIS assessor and a review of assessments, it is evident the CDDO has good process in place to ensure assessments are completed accurately and entered into KAMIS timely.
2. **QA Process** – Policies and Procedures, as well as QA Review form are very detailed. Evidence provided from QA meeting minutes show they go over each consumer survey at the meetings. One member of the QA Committee (not employed by the CDDO or by its affiliates) reviews a 10% sample of all QA reviews, per quarter, to ensure the QA Committee's standards are applied uniformly to all QA reviews. There are some recommendations for improvements, but overall, the process they have outlined and are practicing are considered a strength. Continued practice, improved documentation and follow-up measures will enhance quality of services at both the CDDO and CSP level.

### **3. RECOMMENDATIONS FOR CDDO**

1. **Outcome 3: CDDO completes all management responsibilities as required – Monitoring activity 3d.**  
Issue: Out of 5 individuals sampled, one individual had a signed choice form, however, the boxes indicating Options, Choice Form and Rights-Responsibilities brochures have been reviewed and received were not checked.  
Recommendation: Prior to the individual/guardian/representative signing the choice form, ensure staff are providing and explaining brochures and the appropriate boxes are checked to indicate information was shared and received.
  
2. **Outcome 3: CDDO completes all management responsibilities as required – Monitoring activity 3g.**  
Issue: Though there is affiliate involvement and CDDO holds quarterly Affiliate meetings, interviews and evidence indicate there should be more offered to affiliates for input on CDDO area system management.  
Recommendation: Newly appointed CDDO Coordinator stated they are actively working on improving CSP involvement. Recommend detailed documentation of affiliate meetings including any changes/updates as a result of affiliate input. Also recommend utilizing satisfaction surveys and/or other methods to allow additional opportunities for CSP input on CDDO area system management.
  
3. **Outcome 9: CDDO will maintain a process in coordination with affiliates that results in services being offered and provided in a way that does not discriminate against any persons because of severity of person’s disability – Monitoring activity 9.**  
Issue: Brochure still mentions health homes, which are no longer available in the State of Kansas.  
Recommendation: Update brochures to include updated and accurate information.
  
4. **Outcome 10: CDDO will maintain a locally developed impartial QA process that reasonably addresses regulatory requirements. Monitoring activity 10.**  
Issue: Lack of documentation involving QA oversight.  
Recommendation: Provide detailed documentation, including results and/or actions taken, as well as, continued training and use of corrective action plans issued by the CDDO. Ensure documentation provides details involving any action or trend to further improve the Quality Assurance process. Additional best practice recommendation would be to have more in depth meeting minute notes. There are global statements, but no notation that tracking/trending reports are presented. CDDO could introduce and include graphs and/or evidence, as well as, include tracking of complaints to further show they are making efforts to enhance overall quality.

#### **4. FINDINGS**

1. **Outcome 3: CDDO completes all management responsibilities as required – Monitoring Activity 3.**

Issue: CDDO does not have signed agreements with all affiliates and not all signed affiliates are represented in options forms. CDDO Brochure, “What are my Options” does not advertise Hetlinger, Safe Haven, or Stepping Stones who all had signed affiliate agreements on file. Could not locate affiliate agreement signatures for TFI or Saint Francis, both of which are advertised in brochure.

Recommendation: CDDO must maintain current affiliate agreements with all affiliates. Ensure all affiliate files have current, signed affiliate agreements and that all options are shared in materials provided for informed choice. Cross walk your affiliate agreements with advertising materials and options counseling forms to ensure accuracy between documents.

2. **Outcome 5: Unbiased service option information – Monitoring Activity 5.**

Issue: CDDO is not following “Single Point of Admission and Informed Choice Process” policy as it is written. Brochure and choice forms do not have all affiliated providers listed. There are some providers listed as options that do not have current affiliate agreements.

Recommendation: Ensure all available affiliates are provided on all forms utilized to inform consumers of their options. Upon any changes or updates, these documents should be updated to reflect most current available options.

3. **Outcome 11: CDDO will develop, implement and maintain a gatekeeping system for public and private ICFs/IID that is in compliance with regulations – Monitoring Activity 11.**

Issue: Reviewed 16 files, 2 files did not show evidence that person/family/guardian were informed of available community service choices and types in or near the person’s home annually. There is evidence this information was received in the past for both consumers, however, documentation showed that it had been more than a year since this information was received.

Recommendation: To maintain compliance and implement gatekeeping policy/procedure as written, CDDO must ensure that annual notifications/information is delivered, received and documented.

## **6. BEST PRACTICE RECOMMENDATIONS:**

1. CDDO newsletter is recommended for best practice. Newsletters are a good way for the CDDO to stay in touch with individuals (especially those who are waiting for services) and provide insight to what is available, or any changes/updates. Individuals may opt in to receive an electronic newsletter so they can stay informed. If CDDO continues to advertise in ECKAAA's newsletters, they must ensure impartiality and that all affiliates are offered the opportunity. For those who choose not to advertise in newsletter, would suggest a form indicating that they were offered opportunity and declined.
2. Continue improving CDDO website. Include all necessary information to assist those interested in the CDDO, initiating the process and those who are already receiving services. Additional information, such as a list of available affiliate providers, including updated information on capacity would be beneficial. Because the CDDO is also part of an AAA/ADRC, the website is heavily geared towards aging issues. There is a CDDO link provided with valuable information on East Central Kansas AAA's website, however, a stand-alone website for consumers and interested parties to visit for CDDO information would be a best practice recommendation.
3. Following a sample of provider case transfers inside and outside the CDDO catchment area, CDDO does ensure processes and procedures meet state guidelines, however, additional documentation would be a best practice recommendation. Sample included email to other provider/s involving change, would recommend including read receipt to ensure information was received and documented.
4. The CDDO follows state guidelines in regards to the Council of Community Members, however, all members terms expire in the same year. Recommend staggering terms to avoid a complete overhaul of the Council when terms expire.

**SUMMARY:** Newly appointed CDDO Director is open to changes and working to create a better experience for all involved. This review identified many strengths as well as opportunities for improvement. The CDDO is actively working on improving affiliate involvement and the Quality Assurance process to help excel as an organization, ensure the best services are provided and satisfaction is maintained with both consumers and their providers. There are necessary improvements needed to become fully compliant, but overall, the CDDO does a great job implementing their policies and procedures as written.

# Peer Review Tool

## Review Team Members:

- 1) Colin Rork, PICS, KDADS
- 2) Melissa McDaniel, PICS Manager, KDADS
- 3) Linda Young, PICS, KDADS
- 4) Sara Pearson, Hetlinger CDDO Director
- 5) Quinta Avance, CSP Volunteer

Date of Review: June 27, 2017

CDDO Name: East Central Kansas AAA-CDDO

Address: 117 South Main, Ottawa, KS 66067

Contact Person: Amber Vogeler, CDDO Coordinator

Phone Number: 785-242-7123 ext. 107

Email: amberv@eckaaa.org

### Scoring Compliance Key

(1) =Yes (2) =No (7) = NA

## ACRONYM REFERENCE GUIDE

“ANE” Abuse, Neglect, Exploitation

“BASIS” Basic Assessment and Services Information System

“CDDO” Community Developmental Disability Organization

“COCM” Council of Community Members

“CSP” Community Service Provider

“ICF” Intermediate Care Facility

“ICF/IID” Intermediate Care Facility for Individuals with Intellectual Disability

“KDADS” Kansas Department for Aging and Disability Services

“PD” Position Description

“QA” Quality Assurance

Program Contact:

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**Desk Review Activities - Section I**  
**Review of Policies and Procedures, Website & Newsletters**

#		1	2	7	Strengths & Comments	Findings & Recommendations
1.	CDDO ensures that its policies are distinct to the CDDO, and CDDO operated CSP policies are distinct to CSP. CDDO and CSP functions are governed by two distinct sets of policies.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>CDDO has been separated from CSP for several years. CDDO policies are distinct to the CDDO and are provided on their website.</p> <p>Website also provides updated policies and procedures to be reviewed and open for public comment, which is available to all interested individuals, including CSPs.</p>	
2.	Does the CDDO have a newsletter? If yes, review one years' worth. Does the CDDO ensure written communication demonstrates impartiality of the CSPs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CDDO mentioned that they have opportunity to have space on ECKAAA newsletter to advertise CSPs and offer information on how to become involved to all CSPs they are affiliated with.	Quarterly CDDO Newsletters including updates and any other information involving CDDO and its affiliates would be a best practice recommendation.
3.	Does the CDDO have a company website? If so, does website ensure impartiality of CSPs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>CDDO has a link on the website for East Central Kansas Area Agency on Aging's website. Link provides information on CDDO services, definitions, how to access services, information on TCMs and what they do. Website also offers information on Rights and Self Advocacy, listing contact information in the event that someone would like to reach out to Self-Advocate associates. All policies and procedures are available on the website. This is also where CDDO posted updated policies and procedures for public comment prior to submitting to KDADS for final review.</p>	<p>Website appears to be predominantly geared towards the Aging population. There is a CDDO link provided with valuable information, however, a stand-alone website for consumers and interested parties to visit for CDDO information would be a best practice recommendation.</p> <p>Having a website at all is best practice, so a separate website is not required or necessary. Recommendation would be to include all affiliates with current affiliate agreements on the website.</p>

**On-Site Review – Section II**

**Outcome #1**

**K.A.R. 30-64-20 - CDDO Maintains data regarding CDDO Review Improvement Plans (if any) requested during past review period including rebuttal and date.**

#		1	2	7	Strengths & Comments	Findings & Recommendations
1.	CDDO submitted a performance improvement plan to KDADS as requested. There is documented plan available. Review team and KDADS approved plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CDDO is not being held accountable to this regulation this peer review cycle.	N/A
1a.	CDDO maintains and monitors data for performance improvement plan. CDDO maintains data in a manner that allows evaluation.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CDDO is not being held accountable to this regulation this peer review cycle.	N/A
1b.	CDDO is responsive to data results. CDDO has revised the performance plan as needed.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CDDO is not being held accountable to this regulation this peer review cycle.	N/A
1c.	Completion of improvement plan items occurred. Items completed within timeline and is verified by data and/or outcomes.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CDDO is not being held accountable to this regulation this peer review cycle.	N/A

**Outcome #2**

**K.A.R. 30-64-21 - CDDO Maintains policy and procedure changes that are approved as required.**

#		1	2	7	Strengths & Comments	Findings & Recommendations
2.	CDDO will initially and on an on-going basis, follow the regulatory process when developing policy. Did CDDO run policy/procedure changes through the appropriate process: COCM Input, Board Approval, KDADS approval?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CDDO is in the process of updating all policies and procedures and have followed appropriate regulatory processes to update and send to KDADS for final approval.	CDDO's updated policies and procedures still have to be approved by KDADS. Review indicates minor updates/corrections that will be reflected in final policies and procedures.

**Outcome #3**

**K.A.R. 30-64-22 - CDDO completes all management responsibilities as required.**

#		1	2	7	Strengths & Comments	Findings & Recommendations
3.	CDDO maintains affiliate agreements with all affiliates. Does CDDO have current affiliate agreement for each affiliate?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	All but 3 affiliate agreements were current/signed. COF and Saint Francis are negotiating updated affiliate agreements.	CDDO Brochure, "What are my Options" does not advertise Hetlinger, Safe Haven, or Stepping Stones. Could not locate affiliate agreement signatures for TFI or Saint Francis, both of which are advertised in brochure.
3a.	If the CDDO has cancelled or suspended an affiliate agreement, was the action consistent with regulatory criteria? Criteria: 1) provider did not accept rate equal to that established by the Secretary 2) Provider has established pattern of not abiding by service area procedures 3) Entering into an agreement would seriously jeopardize the CDDO's ability to fulfill its responsibilities.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CDDO has not cancelled or suspended any affiliate agreements.	
3b.	Did CDDO report BASIS information to KDADS in the agreed upon timeframe? (All functional assessments shall be entered into KAMIS within seven calendar days of completion of the assessment.) KDADS will sample completed assessments and dates to compare against KAMIS entries (5 days to initiate assessment from date of request, 30 days to complete assessment from date of request, 7 days to enter in to KAMIS).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	KDADS requested random sample of 15 individuals who had BASIS assessments in the last year. CDDO provided evidence that BASIS information was entered into KAMIS in the agreed upon timeframe, if not prior, for all individuals sampled.	

3c.	Following a sample of crisis/exception requests, do CDDO processes/procedures meet state guidelines?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	KDADS requested a sample of all crisis/exception requests. Uniform process was evident. Evidence provided indicates CDDO is following crisis and exception process as outlined by the State.	
3d.	Following a sample of eligibility determinations, do CDDO processes/procedures meet state guidelines? For example, was each person provided with “comprehensive options counseling?” Is the functional assessment/or reassessment occurring within the stated timeframe?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CDDO provided lists of individuals who had eligibility determinations with Desk Review Material. There were 5 individuals who had eligibility determinations in the last year. All were determined eligible and signed choice form. Choice Form shows all available options and have consumers check box indicating that they “have reviewed the CDDO Options Brochure and choice form with the CDDO” and “reviewed the CDDO Rights-Responsibilities Brochure with the CDDO”.	One individual sampled had a signed choice form, however, the boxes were not checked indicating review of Brochure/Choice Form and Rights-Responsibilities. Recommend staff ensures individual/guardian/representative receives information and checks appropriate boxes prior to signing form.
3e.	Following a sample of provider case transfers inside and outside the CDDO catchment area, does CDDO ensure processes/procedures meet state guidelines?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Sample of provider case transfers inside and outside the CDDO catchment area were reviewed. Evidence shows that CDDO ensures processes/procedures meet state guidelines.	Sample provided showed email notification to other CDDO that consumer was transferring. Recommend these emails are sent with “read receipt” to ensure other CDDO received information and documentation shows that they did receive/”read” email.
3f.	Following a sample of affiliation agreements, does CDDO ensure agreements are uniform for like services? CDDO operated CSP must have an affiliation agreement with CDDO. Affiliation agreement cannot extend advantages not offered to other	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All affiliate agreements were reviewed and are uniform for like services. There is no evidence any agreement extends advantages not offered to other CSPs. Affiliate agreements have an appendix for each type of service, TCM, FMS, Adult Day and Residential, and	

	CSPs.				Children's Residential.	
3g.	Does evidence and documentation demonstrate that affiliated service providers have opportunity for input on CDDO area system management? Correspondence and interviews verify the CDDO makes input opportunities available for all affiliates.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Affiliates have representation on the COCM and Quality Assurance Committee. CDDO also solicit feedback at quarterly affiliate meetings. Reviewed affiliate meeting minutes showing evidence/documentation of opportunity for input on CDDO area system management. Affiliate meeting minutes show that CDDO provides time for "Affiliate News". CSP interviews indicate that CDDO reached out to have them comment/provide input on recent updates to policies and procedures.	CDDO Director stated that they are actively working on providing more opportunity for CSP input on CDDO area system management. Recommend utilizing satisfaction surveys and/or other methods to allow additional opportunities for CSP input on CDDO area system management.
3h.	Does CDDO have any individuals who work for both the CDDO and the CSP? If so, review a sample of PD's.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A. CDDO separated from CSP several years ago and have no staff working for both.	
3i.	CDDO will maintain a separation in function between the CDDO and CSP management and operations. It is clear which functions are CDDO and which are CSP. If there are personnel that work for both entities their position description reflect such. Paper and electronic information is stored securely to ensure CSP division of a CDDO does not have access.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A	

**Outcome #4**

**K.A.R. 30-64-22 - Unbiased affiliation process**

#		1	2	7	Strengths & Comments	Findings & Recommendations
4.	CDDO must have written policies/procedures that are approved in accordance with Article 64 requirements that clearly address the CSP affiliation process, and states the affiliation requirements. Evidence of a policy/procedure and it is followed.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Implementation Responsibilities of the CDDO Policy and Procedure is in place to ensure each CSP entering into an affiliation agreement and operating within its catchment area abides by the procedures applicable to that service are as established pursuant to K.A.R. 20-64-21. When an agency requests to affiliate with ECKAAA-CDDO they are provided with Affiliate agreement and appendixes. Affiliate agreement/appendixes provide all required certification, documentation and expectations for all available services. Journey’s was most recent Affiliate to onboard, file reviewed and evidence shows policies/procedures are implemented as written.	
4a.	CDDO must maintain documentation that identifies the current status of all individuals/entities/applicants requesting affiliation, including notification of appeal/grievance rights. Evidence of a process for affiliation and its monitoring.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CDDO provided spreadsheet for “AFFILIATE Summary FY 2017”. Spreadsheet includes provider name, address, services, affiliate agreement contact information, date returned, current ins/correct, and all info in sections. The “all info in” section shows when completed and outlines what is outstanding for those that are pending. Appeal and Grievance rights are stated in the Affiliation Agreement. Evidence of a process for affiliation and its monitoring is confirmed.	

**Outcome #5**

**K.A.R. 30-64-22 - Unbiased service option information**

#		1	2	7	Strengths & Comments	Findings & Recommendations
5.	CDDO policies and procedures are implemented as written for sharing, with persons requesting/receiving services, impartial information regarding all service options. The policy and procedures ensure all CSP options are shared.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	There is Policy and Procedure “Single Point of Admission and Informed Choice Process” in place, however, brochure and choice form do not provide accurate/updated information.	Evidence provided indicates that CDDO is not following policy as stated in “Single Point of Admission and Informed Choice Process”. There are Affiliates listed on Brochure that do not have signed affiliate agreements and two that are confirmed affiliates that are not listed on Brochure. Recommend keeping updated provider information and ensure all affiliated providers are represented on choice forms and brochures.

**Outcome #6**

**K.A.R. 30-64-22 - Access to HCBS & Day/Res State Aid funding is not dependent on the person’s chosen service provider.**

#		1	2	7	Strengths & Comments	Findings & Recommendations
6.	CDDO policies and procedures for accessing state aid funds are made available on request. An impartial process for determining funding decisions is in place.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CDDO has policy/procedure in place titled “Prior Authorization”. This policy/procedure states that services requested from State Aid funding will be presented to the Prior Authorization review for approval; All State Aid funding approval requests will be subject to adherence of the taxonomy codes approved by KDADS. For those requesting State Aid, CDDO provides “State Aid Emergent/Flex Request Form”. Form includes “Community Options Explored Prior to Request”, “Detailed Explanation of Need”, and “Itemization of Fund Request”. Also includes Business Agreement and	

					“Statement of Usage of State Aid Funded Services” to be signed. CDDO supplied Quarterly State Aid Tracking reports. Evidence indicates an impartial process for determining funding decisions is in place, documented and tracked.	
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**Outcome #7**

**K.A.R. 30-64-23 - CDDO will serve as single point of entry and maintain an effective application, eligibility determination & service choice process.**

#		1	2	7	Strengths & Comments	Findings & Recommendations
7.	Eligibility staff have been trained per regulation. CDDO has developed a training program and such have been approved by COCM. Evidence eligibility staff have completed identified requirements.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CDDO Policy and Procedure for “Single Point of Admission and Informed Choice” addresses the training of eligibility staff. Policy and Procedure notes that staff responsible for determining eligibility, processing applications for service referral, or assisting persons in accessing services must complete a training program developed by the CDDO and approved by the COCM. CDDO produced training record for Amber Vogeler, who is only eligibility staff, showing that training was approved by COCM and completed.	
7a.	CDDO policies and procedures are impartially implemented as written for the process that is utilized for persons wishing to change CSPs in that CDDO area. Policies and procedures are implemented as written.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CDDO has policy/procedure in place titled “Service Changes and Impartial Informed Choice” outlining their process. CDDO provided spreadsheet with desk review materials showing all individuals who have requested CSP changes in the last year. Spreadsheet has consumer name, date of choice, current provider/services, new provider choice, provider notification, notes/reason given for	

					change, and date of transition. Evidence shows they are implementing policy and procedure as written.	
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**Outcome #8**

**K.A.R. 30-64-23 - Informed Choice of Community Service Providers**

#		1	2	7	Strengths & Comments	Findings & Recommendations
8.	CDDO effectively maintains documentation of service provider change/transition requests/notifications. Notifications are maintained.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	KDADS requested a sample of 9 individuals who have requested or completed service provider change/transition. All reviewed had current signed choice forms, with signatures from individuals/guardians/representatives and CDDO staff. Provider Change Tracker spreadsheet and sample of consumer files indicates CDDO effectively maintains documentation of service provider change/transition requests/notifications and notifications are maintained.	

**Outcome #9**

**K.A.R. 30-64-25 - CDDO will maintain a process in coordination with affiliates that results in services being offered and provided in a way that does not discriminate against any persons because of severity of person’s disability.**

#		1	2	7	Strengths & Comments	Findings & Recommendations
9.	CDDO process is effective. All persons that request services, for whom funding is available, receive requested services. Review: affiliate agreement; policy/procedure; any agreements for provider specialization and capped capacity.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CDDO has Uniform Access to Services policy which states that all persons have equal access to services. Affiliate agreement also provides statement that all persons that request services, for whom funding is available, regardless of severity of disability, receive requested services.	CDDO provided a brochure that mentions “Health Home” which is no longer available in Kansas and needs removed from brochure. If affiliates are ever listed on the website, would recommend adding notification or “flag” when an affiliate is at capacity.
9a.	CDDO identifies number of persons the Secretary of KDADS has determined inappropriate for	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CDDO has not had any persons the Secretary of KDADS has determined inappropriate for community services	

community services because the person presents a clear and present danger to self of community.				because the person presents a clear and present danger to self and community.	
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**Outcome #10**

**K.A.R. 30-64-26 & 30-64-27 - CDDO will maintain a locally developed impartial QA process that reasonably addresses regulatory requirements.**

#		1	2	7	Strengths & Comments	Findings & Recommendations
10.	QA process addresses the required regulatory requirements including: Choice, Person-Centered, Rights & Responsibilities, Paid/Delivered, Third Party payment responsibility and ANE reporting information?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Quality Enhancement, Quality Assurance and Council of Community Members policies and procedures are very thorough, detailed and address all regulatory requirements to ensure and improve quality of care. CDDO staff complete on-site reviews for at least 20% of total number of individuals served in the CDDO service area each year. On-site surveys are both scheduled and unscheduled for persons receiving licensed services in order to ascertain quality of services, as per Affiliate Agreement with the CDDO. Additional reviews will be completed based on trend tracking data. QA committee reviews are discussed at quarterly meeting to ensure all elements of the regulation are met. If committee determines that an affiliated provider has not gained compliance with a particular regulation, the Committee will request appropriate corrective action through the CDDO, and the CDDO will provide a follow-up report to the Committee at the next quarterly meeting. One member of the QA Committee (not employed by the CDDO or by its	<p>Recommend meeting minutes include more detail. There are global statements, but no notation that tracking/trending reports are presented. Best practice recommendation would be to introduce and include graphs and/or evidence to show they are making efforts to help better the system.</p> <p>CDDO Director commented that she has recently worked with Licensing on creating Corrective Action Plans that CDDO could issue. As newly assigned CDDO Director, this practice could help improve CSP relations and potentially mitigate corrective action plans being issued by Licensing.</p> <p>Policy indicates CDDO reviews 100% of PCSPs of persons-served in the CDDO region each year. Review team did not find evidence that this practice was implemented. CDDO Director stated that this has not been occurring. CDDO is updating policies and procedures and updates will reflect a smaller percentage sampled for review.</p>

				<p>affiliates) will review 10% sample of all QA reviews, per quarter, to ensure the QA Committee's standards are applied uniformly to all QA reviews.</p> <p>All Trend Tracking Reports and Adverse Incident Reports will trigger a Quality Enhancement review to assure compliance with stated person-centered support plan supports and interventions.</p> <p>QA meeting minutes indicate that they review quarterly client surveys, Committee goes over each survey at the meetings.</p>	<p>Policies and Procedures for QA address and exceed regulatory requirements, would be considered best practice if CDDO could provide evidence/documentation that all written is fully implemented.</p>	
10a	<p>CDDO maintains evidence that the same remediation and follow-up process is utilized for all CSPs for same services.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>No CSPs had corrective action plans issued by the CDDO. CDDOs Quality Enhancement, Quality Assurance and Council of Community Members Policies and Procedures indicate the same remediation and follow-up process is utilized for all CSPs for same services.</p>	<p>Review team could not locate any evidence that CDDO follows-up on notice of actions issued from licensing and no evidence that CDDO was tracking/following-up on Substantiated APS/CPS reports.</p> <p>Recommend continued involvement and training with Licensing. Maintain detailed documentation to show that policies and procedures are implemented as written.</p>

**Outcome #11**

**K.A.R 30-64-29 - CDDO will develop, implement and maintain a gatekeeping system for public and private ICFs/IID that is in compliance with regulations.**

#		1	2	7	Strengths & Comments	Findings & Recommendations
11.	Is CDDO informing person/family/guardian of available community services choices and types in or near the person’s home annually?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Gatekeeping policy and procedure outlines process which follows state guidelines. Policy states that CDDO will inform the person and the person’s guardian, if one has been appointed, on an annual basis of all services and supports that are available or could be made available in or near the person’s home county of Coffey, Osage, or Franklin. CDDO will also inform of the person’s rights pursuant to the Developmental Disabilities Reform Act and Implementation Regulations.</p> <p>14 out of 16 files reviewed provided evidence that CDDO is informing person/family/guardian of available community services choices and types in or near the person’s home annually. They were provided “Informed Choice” and “Who We Are” brochures that include options and rights.</p>	Review team found that 2 out of the 16 files reviewed were not compliant with providing community service choices and types in or near the person’s home annually. Evidence showed they were provided this information in the past, but it has been over a year for the 2 individuals mentioned since receiving information. CDDO must ensure this practice is implemented for all involved to be in compliance with regulations.
11a	Does CDDO have documentation of ICF/IID requests? Following a sample of ICF/IID request for admissions, did the CDDO follow appropriate “gatekeeping” policies and procedures to ensure appropriate processes were followed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CDDO has had one ICF/IID request in the last year. Evidence provided shows that CDDO follows appropriate “gatekeeping” policies and procedures to ensure appropriate processes were followed.	

**Outcome #12**

**K.A.R 30-64-31 - CDDO maintains a council of community members that meets the regulatory requirements.**

#		1	2	7	Strengths & Comments	Findings & Recommendations
12.	Did CDDO provide a list of the council of community members?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CDDO provided list of council of community members. There are 7 voting members. COCM consists of 4 members that are family/representative/persons served, 2 Community Service Providers, 2 CDDO staff and 2 alternates.	
12a	Does the council membership meet the regulatory requirements? Comprised of a majority of persons served, family members and/or guardians and includes affiliates of the CDDO for no more than 2 consecutive 3 year terms.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Review of COCM indicates council is comprised of a majority of persons served and includes affiliates of the CDDO for no more than 2 consecutive 3 year terms.	All COCM terms expire in the same year. Recommend staggering terms to avoid a complete overhaul of the Council when terms end.

**Outcome #13**

**K.A.R. 30-64-32 - CDDO maintains an effective dispute resolution system that meets regulatory requirements.**

#		1	2	7	Strengths & Comments	Findings & Recommendations
13.	CDDO has policies/procedures implemented as written and approved in accordance with Article 64 requirements, and clearly addresses how persons requesting/receiving services and family members receive information regarding the CDDO complaint/grievance process is accessed.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CDDO has Dispute Resolution Policy and Procedure that is in accordance with Article 64 requirements. Outlines procedures for each different dispute that may arise between person/guardian/rep, the CDDO, affiliated community provider, CDDO and any entity that wishes to become an affiliated provider, and the CDDO and any other component of community service system that involves the CDDO including CSPs. Disputes will be presented to the COCM. CDDO provided evidence in form of "Getting Started" and CDDO Rights-	

					Responsibilities brochure, which details the types of things a person can dispute. Brochure “Who We Are and What We Do for You” has an appeal rights section. Website on homepage has appeal information as well.	
13a	CDDO will maintain evidence that the dispute resolution process is made available to all persons requesting it and to any persons whom a negative action has been initiated.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Evidence shows that dispute resolution process is available to all persons requesting it and to any persons whom a negative action has been initiated. Information received at every BASIS, everyone that is brand new, or anyone who would like to dispute tier zero. There is a check box on options form under rights and responsibilities, which includes dispute resolution information. Evidence provided showed two individuals who contacted CDDO to initiate the Dispute Resolution Process. Follow-up emails provided evidence CDDO responded with all necessary information to submit a Dispute and the process in general. Policies and procedures are implemented as written.	
13b	CDDO must maintain evidence of all incidence in which the dispute resolution process was initiated by any party.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CDDO provided evidence of two requests to initiate dispute resolution process. Documentation showed process is made available to all persons requesting and to any persons whom a negative action has been initiated. CDDO has spreadsheet and COCM meeting minutes indicate dispute process is monitored and process is implemented as written.	

13c	CDDO must evaluate the collected data in effort to utilize trends to improve the CDDO system.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CDDO uploads Quarterly Complaint Tracking Form to KDADS to track formal complaints.	There has been nothing to evaluate in the last year that could be utilized to identify trends. Recommend continued documentation and evaluation.
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CONSUMER/FAMILY INTERVIEW	Y	N	N/A	COMMENTS
<b>3 total respondents</b>				
1) Did you understand the eligibility application process? If not, please explain	3	0	0	1) Lack of knowledge about the waiver, was hard to understand. CDDO has been helpful answering questions and improving understanding.
2) Do you believe the eligibility determination process is understandable and timely? If not, please explain.	3	0	0	
3) Do you believe the service referral process (including options counseling) was timely? If not, please explain.	3	0	0	
4) Did the CDDO make you aware that you can appeal or request a review of any decision made by your CDDO? If not, explain.	3	0	0	1) Not sure if it was brought up, however, was included in brochure/s 2) Yes, provided all necessary information throughout the process. 3) Probably so, I know I have written documents experiencing this.
5) If currently receiving services, did you receive information on all service providers in your area when you found out you had funding and could begin the process of selecting a provider?	1	0	2	
6) If currently receiving services, have you ever changed service providers? If so, how did you receive information about all your service options?	1	0	2	1) Our TCM left and we did not know. CDDO helped, provided information on all available options.
7) If currently receiving services, do you know who to contact if you want to change service providers? If so, who?	2	0	1	1) Not receiving services, but would contact CDDO and Case Manager.
8) Do you have any other information regarding your interactions with the CDDO that you would like for us to consider?	1	0	2	1) They are great. CDDO helped us when we had no TCM provider to get re-established again.

COMMUNITY SERVICE PROVIDER INTERVIEW 9 total respondents	Y	N	N/A	COMMENTS
9) Does the CDDO have an effective process for completing the annual BASIS assessment? If no, please explain?	6	3	0	<ol style="list-style-type: none"> <li>1) The acceptance of supporting documentation has for the past few years been fickle and not reasonable at times.</li> <li>2) They are hyper-rigid and inflexible. They will not entertain or engage in reasonable dialog. They make up their own (often capricious) interpretations of how to apply rules without informing us in advance.</li> <li>3) The way the BASIS is conducted depends entirely on who is doing the BASIS within the CDDO. One assessor even went so far as to deny general physician documentation on an individual who is blind and has been his entire life.</li> </ol>
10) Does the CDDO maintain a process to solicit (ask you) for your input on CDDO policies/procedures, major local systems change and statewide initiatives for which they represent your area? If not, please explain.	8	1	0	<ol style="list-style-type: none"> <li>1) Policies are reviewed and revised at Council of Community Members meetings of which we send a representative.</li> <li>2) CDDO policies are posted. Some changes to procedures have been made without input; the CDDO seems to be scheduling more affiliate meetings to solicit more input and give explanation of procedures.</li> <li>3) This month we have been notified of changes that are available for viewing. This is the first time in several years. I am still unsure if input is being accepted.</li> <li>4) ??? We just recently received an email of their P&amp;P being posted on their website. We don't know if that means they are open for input/feedback though.</li> <li>5) We were invited to comment on CDDO policies, we are invited to Stakeholder conference calls and we are invited to CDDO Affiliate meetings. Their contract is also overly extensive. We have one with another CDDO which is much more concise and less extensive.</li> </ol>
11) Does the CDDO share information about your CSP with persons seeking services?	5	4	0	<ol style="list-style-type: none"> <li>1) Provides brochures, offers to arrange tours.</li> <li>2) Choice Form.</li> <li>3) We have been told we are on the choice forms, but have not been allowed to submit marketing materials. We are unsure how information about us is presented.</li> <li>4) The name of our company is on their "choice form". There is no process for "informed choice". We are not allowed to provide marketing materials.</li> <li>5) No, their contract and policies currently state that they do not provide any detailed CSP information to persons seeking services. They have refused to include any marketing material we may have in any communication with potential clients.</li> </ol>

				6) Provider Lists.
12) Does the CDDOs literature demonstrate impartiality regarding the CSPs in your area?	6	3	0	<ol style="list-style-type: none"> <li>1) I am unsure what literature they present about us or other CSPs.</li> <li>2) We do not know. We have not seen their literature. We do know for a fact that they are biased against COF.</li> <li>3) Our CDDO doesn't relay information about CSP's impartially. They even told one of our board members that we were closing.</li> </ol>
13) Are you aware of communication in which the CDDO benefitted one CSP over another? If yes, please explain.	3	6	0	<ol style="list-style-type: none"> <li>1) We have several reports and hard evidence, over the past years that make us think they are biased against us. This is including applying rules differently to us than our fellow CSP.</li> <li>2) Examples are too numerous to cover in this format. One example, they lied to a guardian telling the guardian that one of our day program sites was closing and that the guardian would need to choose a non-COF option. They didn't know that the guardian was Board member though. We complained to them. They did not apologize. They said they'd stop. They did not stop. They slightly modified their wording so as not to be so overt about their bias.</li> <li>3) The CDDO informed one of our board members who is a parent that we were closing. They also tell individuals that it might be more beneficial if they choose another CSP. They also solicited another CSP to come into our area.</li> </ol>
14) Does the CDDO manage an effective process for persons to access your services? If not, please explain.	6	3	0	<ol style="list-style-type: none"> <li>1) We are not aware of anything that happens except for receiving choice form.</li> <li>2) ??? we have no way of knowing based on the lack of information they provide us. See #5. We have ample reason to be dubious.</li> <li>3) They overstep their boundaries – they are providing case management services instead of working with case management and the CSP.</li> </ol>
15) Does the CDDO maintain and share (if requested) a list of names of those persons interested in services who have consented to release their names?	5	4	0	<ol style="list-style-type: none"> <li>1) We have never been given a list of names or had this even been offered. We are occasionally told of single individuals looking, with minimal details. If we respond as able to serve, we sometimes get contact info at that time.</li> <li>2) We have asked, but have never received. We have never seen a list of names.</li> <li>3) We have not seen this list in over four years.</li> </ol>
16) Does your CSPs grievance/dispute resolution process refer the person to the CDDO if the issue is unresolved? If not, please explain.	9	0	0	<ol style="list-style-type: none"> <li>1) It has always been a part of our grievance process, per article 63/64.</li> </ol>

CDDO STAFF INTERVIEW AMBER VOGELER, CDDO DIRECTOR	Y	N	N/A	COMMENTS
17) Has the CDDO refused to affiliate with a provider? If so, was the appropriate regulatory criteria applied?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
18) Has the CDDO cancelled/suspended an affiliate agreement? If so, was the appropriate regulatory criteria applied?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No, they do have some affiliate's negotiating contracts, but have not cancelled or suspended an affiliate agreement.
19) Does the CDDO solicit input from all affiliates regarding policies/procedures, major local systems change and statewide initiatives for which they represent your area? If so, how?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Amber answered both yes and no on this question. Any changes are brought to affiliates attention, but it may be after the change. All affiliates were alerted of recent changes to policies/procedures and posted on website for public/affiliate comment/feedback.  Amber admitted that they had not done much in the past, used examples that they were black or white (do it or don't do it). Recently began working on increasing affiliate involvement.
20) Does the CDDO maintain separate in CDDO/CSP functions? If so, how?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	As of 2015, CDDO is no longer affiliated with a CSP. There are 2 staff who perform functions for CDDO and ADRC, however, there is no conflict of interest. Working on making some changes to the office so CDDO will have its own space in the back of the building to further separate CDDO and ADRC functions.
21) Do you explain the difference between the CDDO and CSP functions to families and consumers? If so, how?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Though CDDO is not connected with CSP, consumers receive brochures and comprehensive options counseling to explain the different services that are offered. CDDO also describes their roll to further educate consumers/guardians on functions of the CDDO and those of the CSPs.
22) Do all CSPs in your area serve anyone requesting services, regardless of severity of disability? If not, please explain	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes, they do, though they fight about it sometimes, CDDO makes sure CSP does not discriminate based on severity of disability. Amber mentioned that common 'excuses' are that they do not have enough money, qualified staff, or that extraordinary funding does not cover all the costs. When CSP attempts to deny service while having capacity to serve, CDDO tells them that they will comply with consumer's choice.
23) Does the CDDO QA process assure services are provided in a manner consistent	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I believe so. Review form follows Article 64 to a T. CDDO goal is to review seven a month. Currently, there is only one person (Amber) to complete these reviews, so may

with Article 64 including: Choice, Person-Centered, Rights & Responsibilities, Paid/Delivered, Third party payment responsibility, Report ANE? If so, how?				be reviewing one a month.
24) Does the CDDO inform persons and providers of the dispute resolution process? If so, how?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	“Who We Are” brochure dedicates a section to Appeal Rights “How to change something that you do not agree with in your services”. There is contact information on how to get started in an appeal. All appeals must be submitted in written form to Chairperson of the Council of Community Members, which is spelled out in brochure. This brochure is provided to consumers annually at BASIS, all individuals interested, and those who are just starting the eligibility process. Affiliate Agreements provide information on how to initiate Dispute Resolution process, along with in their policies and procedures.
25) What does your CDDO do in terms of best practices, or something that may set you apart from other CDDOs across the state? What are your organizations greatest strengths?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not very familiar with any other CDDOs, or any practices that they do that would separate them apart. Amber did mention that the MCO’s stated that their 2 month notification prior to BASIS is an asset.  CDDO uses one choice form, they receive the form and the brochure including all options.
26) In your opinion, what are some areas your CDDO could make improvements.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Need to be more involved with affiliates. Since CSP has broken off from CDDO, there has been some tension there, but that seems to be improving. CDDO would like to continue with this progress and begin improving CSP involvement across the board.
27) What CDDO function do you find to be the most challenging?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	I am the only person, try to do everything and it does not work. Still working on learning and improving education on the many facets of CDDO Director. Was not aware that CDDO could issue corrective action plans and has recently received some training from Licensing to help in this area.
28) What does your organization do in terms of strategic planning? Looking forward over the next five years, what sort of goals may your organization be working towards?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The CDDO does not do anything in terms of strategic planning. AAA has board of Directors that does some strategic planning for AAA, but would like to include CDDO planning with board members.  Looking forward, would like to improve affiliate involvement. Amber would also like for the CDDO and the CDDO area to be known for what they can offer to families.
29) How does your organization measure your success? Specifically, what sort of data does	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not aware of a way organization measures success other than from word of mouth. Would like to start sending a CDDO survey to CSPs, providers, TCMs, and consumers

your CDDO capture? How do you analyze the data?				to allow input for how CDDO can make improvements.
<b>BASIS ASSESSOR INTERVIEW</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>COMMENTS</b>
<b>GINGER ACKER, BASIS ASSESSOR</b>				
1) Please walk us through the assessment process for an initial assessment and a reassessment. What does the timeline look like from start to completion?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Initial: Amber does eligibility, schedule within timeframe, send email notifications, phone contacts, identify needs, access TCM/Medicaid eligibility. They try to schedule within one week, do assessment and enter in to KAMIS within 7 day timeframe. NOA goes out.  Reassessment: Amber schedules and sends out notification two months prior to BASIS. At assessment, provide signature form and explain their right to dispute. Individuals are allowed 48 hours after the assessment to supply any additional information. If information is not submitted within 48 hours, whatever question necessary information was needed for is marked "No". Notification form issued if something on BASIS changes. Information is entered into KAMIS within 7 day timeframe following assessment.
2) Is the consumer always present for their BASIS assessment? If not, please explain why.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	99% of the time they are present. If not, it is usually due to behaviors present. Always offer consumers the option to leave if they are not comfortable during the portion where they discuss behaviors. Regardless, she wants to have eyes on with consumer at some point in the assessment, specifically, portions where their functioning is observed. If consumer is not able to be at BASIS at all, the meeting is rescheduled.
3) Does the CDDO report BASIS information to KDADS in the agreed upon timeframe? If not, please explain.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Goal is always to get information entered into KAMIS within 7 days. If additional information is needed, assessor waits 48hrs to process, if and once everything is in, assessor processes assessment within 48hrs to ensure final review and submission occurs within 7 day timeframe.
4) What do you find to be the most challenging aspect of your position?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	TCMs that do not know their customers. Some come in unprepared and are learning things they should know about their customers at the assessment. Sometimes TCMs become argumentative at the meeting, but assessor noted that she is more hardnosed and not always popular, but does not allow TCMs to affect the outcome of assessment with their arguments.
5) In your opinion, what improvements can be made to the assessor process?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Currently cannot think of any improvements other than to have trainings on controversial parts/answers on the assessment. Ginger and the other assessor will talk with Amber internally about issues. There is no set networking with outside CDDO

				assessors at this time.
6) What sorts of education and training is offered to you by the CDDO or you participate on your own?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	We consistently reference policy with one another anytime we have a disputed item we get together and discuss. Disputes happen maybe once quarterly and use these as learning opportunities. Staff get together, go over different scenarios and learn from each other/experiences.