



March 10, 2017

CDDO Peer Review of Achievement Services for Northeast Kansas, Inc. CDDO

Review Team:

Melissa McDaniel, KDADS

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CDDO REVIEW REPORT SUMMARY OF FINDINGS

Achievement Services for Northeast Kansas, Inc. CDDO Peer Review
March 10, 2017

1. GENERAL COMMENTS

The review team thanks the CDDO for all the hard work, preparation and coordination to make this review as effective and efficient as possible. Achievement Services for Northeast Kansas, Inc. CDDO Peer Review was held on March 10, 2017 at 9:00 a.m. Prior to March 10th, Achievement Services was last reviewed April 17, 2012. Currently Cathy Montgomery serves as Director of Achievement Services and was the primary point of contact for KDADS throughout the review process. Desk review materials were submitted timely, all information requested was received. Files and samples were separated and labeled by specific outcome, and all required documentation was supplied for review. The organization of review materials was very helpful and much appreciated.

2. IDENTIFIED STRENGTHS

1. **QA Process** – Achievement Services Quality Assurance Procedures and implementation helps to ensure quality service for persons served. Cathy conducts a 100% file review of each affiliate every year. In addition to file reviews, an onsite review is completed for every affiliate. The Achievement Services “CDDO Quality Oversight Licensed Services On-Site Visit Checklist” is helpful document. The checklist includes consumer interview component, physical site checklist, file review, and service delivery verification. Results of all quality assurance procedures are typed and presented to the QA committee. The CDDO’s various QA activities, reporting and tracking techniques are a great asset. CDDO Director Cathy Montgomery is very involved and present at as many onsite visits as possible and reviews all records creating a hands on approach that is beneficial to the CDDO, providers and consumers.
2. **BASIS entry** – KDADS requested random sample of 20 individuals who had BASIS assessments in the last year. Evidence demonstrates the CDDO has no issue entering assessments into KAMIS in the agreed upon timeframe. All samples were entered in advance of agreed upon timeframe.
3. **Individualized Service** – CDDO Director Cathy Montgomery is very organized and is able to operate as the sole employee of the CDDO. Performing all BASIS and eligibility determinations, along with file reviews and QA onsite visits, Cathy is

able to have a hands-on approach from the moment the individual is determined eligible, to ensuring optimal services throughout their time with the CDDO. Despite the fact Achievement Services is one of the smaller organizations; they still manage to provide a lot of individualized service and personal attention to persons served.

3. RECOMMENDATIONS FOR CDDO

1. Outcome 2: CDDO Maintains policy and procedure changes that are approved as required – Monitoring Activity 2.

Issue: Policies and Procedures are outdated and include practices and language.

Recommendation: The review team acknowledges CDDO is in process of sending policies/procedures in batches to COCM and plans to update all policies. Any substantial changes to policy should be sent through process outlined in the contract. KDADS would encourage an annually scheduled review of all policies moving forward. Critical incident Policy/Procedure should be updated to include requirement and instructions on reporting AIRs.

2. Outcome 3: CDDO completes all management responsibilities as required – Monitoring Activity 3i.

Issue: Administrative Assistant position description does not separate job function for CSP and CDDO duties.

Recommendation: Update Administrative Assistant position description utilizing same format as used on position descriptions for Executive Director and Finance Manager. Separate job functions by those performed for CDDO and those for CSP.

3. Outcome 12: CDDO maintains a council of community members that meets the regulatory requirements – Monitoring Activity 12a.

Issue: All council member terms expire the exact same year.

Recommendation: Consider staggering council terms as the recruiting process will be challenging the way the council currently exists.

4. FINDINGS

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

Issue: CDDO shares phone, fax and outdoor signage with CSP. CDDO does not maintain their own website so it appears the CDDO can be reached via the CSP website. CDDO and CSP share very similar names which may be confusing for the public to make the differentiation between the two.

Recommendation: KDADS would like to see the CDDO develop a plan with timelines to ensure further separation in function. The plan will be due to KDADS within 30 days of receipt of this report. KDADS will allow for a more reasonable timeline to incorporate some of the proposed changes as some may be tied to additional funding.

6. BEST PRACTICE RECOMMENDATIONS:

1. Reinitiate newsletters 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.
2. Continue developing CDDO website. Include all necessary information to assist those interested in the CDDO, the eligibility process and those who are already receiving services. Achievement may consider visiting <http://www.cddo.cwood.org/> to see a well-developed website with some good content for consumers, family members and other interested individuals.
3. All requirements met for Outcome 11: CDDO will develop, implement and maintain a gatekeeping system for public and private ICFs/IID that is in compliance with regulations. Recommend annual letter include same language as choice form with statement, “I understand that should I have any questions or seek more information about changing providers I may contact either the case manager for my family member/ward or the CDDO Director with Achievement Services” to ensure individuals understand who they can reach out to should they wish to change service providers.
4. Dispute Resolution Policy/Procedure does not address how individuals are notified of dispute resolution process. Director indicated individuals are notified at time of BASIS and annually, provided sample of signed Person Served Rights & Dispute Resolution form, but this process is not outlined in the policy.

SUMMARY: This review identified many CDDO strengths as well as opportunities for improvement. Achievement Services of Northeast Kansas, Inc. CDDO was very organized and accommodating. Being sole employee of CDDO, Director Cathy Montgomery is involved with every aspect of the process and goes above and beyond to ensure consumers receive the best services possible. Overall, the CDDO does a great job meeting state requirements. Cathy's knowledge, experience and in depth involvement are beneficial to all involved with the process.

Peer Review Tool

Review Team Members:

- 1) Melissa McDaniel, Program Integrity Manager, KDADS
- 2) Colin Rork, PICS, KDADS
- 3) Linda Young, PICS, KDADS
- 4) Laura Garrison, PICS, KDADS
- 5) Janice Denney, Director, Riverside Resources
- 6) Delores Cummings, Volunteer, TARC

Date of Review: March 10, 2017

CDDO Name: Achievement Services of Northeast Kansas, Inc. CDDO

Address: 215 N 5th, Atchison, KS 66002

Contact Person: Cathy Montgomery, Director

Phone Number: 913-367-2432

Email: cathy@asnek.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:

KDADS Program Integrity

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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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Before Cathy was Director, CDDO emphasized maintaining separation in function. It is evident that Cathy continues the emphasis and has made further progress ensuring CDDO and CSP functions are separate.	Policies and Procedures need updated to reflect current language and requirement changes. Recommend CDDO have separate phone and fax numbers from CSP.
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 previously had quarterly newsletters. Best practice recommendation would be to reinstate this practice.
3.	Does the CDDO have a company website? If so, does website ensure impartiality of CSPs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CDDO has website that only provides contact information for Director.	Continue working on CDDO website. Refer to Cottonwood CDDO's website for best practice recommendations (http://www.cddo.cwood.org/). This is a great asset to provide information to those interested in the CDDO and help with the process of initiating and receiving services.
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.	<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

	CDDO maintains data in a manner that allows evaluation.					
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 has begun updating all policies. Cathy indicated they are submitting updates to COCM in batches. Evidence supports CDDO is following regulatory processes when developing/updating policy.	CDDO policies are out of date and include old language that needs updating. Any substantial changes to policy need to be sent through process outlined in the contract. Upon completion, distribute the policy via the IDD upload utility tool. IDD Program Manager and Commissioner will review and approve policy changes.

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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	ASNEK CDDO provided review team current affiliate agreements for all affiliates. All were in compliance.	N/A
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.	N/A
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 20 individuals who had BASIS assessments in the last year. CDDO provided evidence showing that BASIS information was entered into KAMIS in the agreed upon timeframe for all individuals sampled. Several were entered same day as assessment, the rest were next day to three days following BASIS. ASNEK does a great job meeting/exceeding agreed upon timeframe and has no problem entering BASIS into KAMIS within 7 days. Tier reports are also created and provided to	N/A

					case manager, provider and MCO when they do the BASIS assessment.	
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. CDDO had 2 crisis requests and one exception request. Evidence provided indicates CDDO is following crisis and exception process as outlined by KDADS.	N/A
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. In the last year, they had 3 eligibility determinations. There was only one consumer able to fill out choice forms, one was determined ineligible, and the other moved to Nebraska. The individual who was determined eligible was provided comprehensive options counseling and signed choice form indicating such. Processes/Procedures meet state guidelines and evidence shows they are implemented.	N/A
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"/>	CDDO submitted all provider case transfers inside and outside CDDO catchment area with desk review materials. KDADS requested sample of 10 consumers to review which CDDO provided. Evidence demonstrates CDDO processes/procedures meet state guidelines and are implemented. Continuity and Portability of Services Policy/Procedure in place to ensure process is accurately followed.	N/A

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 CSPs.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All affiliate agreements reviewed and are uniform for like services. There is no evidence any agreement extends advantages not offered to other CSPs.	N/A
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 affiliate meetings. Reviewed affiliate meeting minutes showing evidence/documentation of opportunity for input on CDDO area system management.	N/A
3h.	Does CDDO have any individuals who work for both the CDDO and the CSP? If so, review a sample of PD's.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes, three individuals: Executive Director, Finance Manager and Administrative Assistant.	N/A
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 checked="" type="checkbox"/>	<input type="checkbox"/>	Position descriptions for Executive Director and Finance Manager nicely outlined duties for CDDO versus CSP. Separation was not as clear when reviewing Administrative Assistant Position Description. Paper and electronic information is stored securely in Director Cathy Montgomery's office. She is the only person who has access. Cathy takes care of ordering all her own supplies.	Update Administrative Assistant Position Description. CDDO shares the same phone and fax line with CSP. CDDO contact information is located on the CSP website. CDDO does not maintain a webpage of their own. Company names for CDDO and CSP are very similar. No outdoor signage is present for the CDDO, only CSP.

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 agency requests to affiliate with ASNEK, an agreement is sent to them along with all addendums (A-D). Affiliate agreement/addendums provide all required certification, documentation and expectations for different services.	N/A
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"/>	All affiliates are provided a checklist indicating the name of organization affiliating, services to be provided, date of initial contact, required documentation checklist, and date documentation received. Addendums A-D provide information and documentation required to become an affiliate with ASNEK CDDO. All Affiliate Agreements reviewed included evidence of this process for affiliation and it's monitoring with checklist including date of initial contact and dates required documentation received. This allows CDDO and CSP to see what else is needed and where CSP is at in the process. Dispute Resolution Policy/Procedure outlines process for	N/A

					<p>appeal/grievance rights and the different circumstances in which it can be used. Specifically for this outcome, it outlines process for any entity that wishes to become an affiliated provider.</p>	
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Outcome #5

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

#		1	2	7	Strengths & Comments	Findings & Recommendations
5.	<p>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.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>There is policy and procedure in place titled “Single Point of Entry”. This policy ensures CDDO will impartially inform eligible individuals of the role of each service provider and how each may be accessed. There is also protocol titled “Affiliate Information & Referral Protocol” which states that CDDO will always represent all affiliated agencies fairly and equally to any individual who is choosing a provider. Protocol also indicates that a complete Affiliate List will be provided to any individual requesting information about providers in Atchison or Jackson County. At all BASIS, consumers are provided with all affiliated organizations and choice form. Reviewed choice form, which included all affiliates (Case Management, Day, Residential, FMS, PCS, and SHC Choice Form).</p>	<p>Policy and Procedure needs updated. CDDO Director indicated all policies and procedures will be submitted to COCM and go through process outlined by KDADS to change/update policy/procedure.</p>

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"/>	Fiscal Management policy and procedure is made available on request. There is also protocol titled “State Aid Allocation Protocol”. CDDO supplied Quarterly State Aid Tracking reports. State aid allocation demonstrates an impartial process for determining funding decisions is in place, documented and tracked.	N/A

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 has “Eligibility Determination Training Policy” outlining necessary training to complete the job with competence. Policy was approved by Council of Community Members at January 17, 2017 meeting with accompanying documentation. Training includes study of eligibility protocol manual, attend trainings offered in the area focused on specific areas of Developmental Disabilities, attend InterHab Eligibility/subgroup of FRN CDDO Conference Calls, attend any Statewide Eligibility Roundtable session that are called, attend any Eligibility	N/A

					training that is provided by KDADS or other CDDOs, attend the monthly Regional CDDO Roundtable session that are schedule, and periodically check the KDADS website for updated eligibility materials. CDDO provided Eligibility Determination Training completed by Cathy Montgomery, which indicates necessary training was 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"/>	“Single Point of Entry” and “Uniform Access to Services” policies and procedures are impartially implemented for the process that is utilized for persons wishing to change CSPs in that CDDO area. Uniform Access to Services Policy/Procedure states that annually, consumer/guardian will be informed that they may change providers at any time during the year upon notice to their current service provider. Annual provider choice form is supplied providing a place to check if they wish to change providers. Choice form includes all affiliated providers. Choice form allows tracking indicating date change requested and effective date for new or changed service.	Policies and procedures need updated, currently include old language. CDDO indicated that all policies and procedures are in process of being updated and they are going through necessary processes to implement changes.

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"/>	<p>“Service Provider Change Protocol” gives step by step information on how to change providers. Desk Review materials included list of all individuals who have changed providers in the last year. KDADS requested random sample of 10 consumers who have changed providers in the last year, CDDO provided at review. All consumers who were sampled had a choice form including all affiliates, indicating what service they’d like changed and is signed by consumer/guardian. Choice forms indicate date change was requested and effective date for new or changed service. Documentation provided with Desk Review materials indicates tracking person served, service changed, previous provider, new provider, and date changed. Along with choice form, CDDO supplied Achievement Services for Northeast Kansas, Inc. CDDO Provider Change Form. This form shows all consumer information, date provider change form completed and received by CDDO, service(s) being changed, current provider, service end date, new provider, service state date, TCM Units used, TCM Units Remaining, and documents to be provided checklist. CDDO effectively</p>	N/A

					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 states that CSP must comply with all CDDO written procedures, by signing agreement, they indicate that they have reviewed policies and procedures outlining that all persons that request services, for whom funding is available, regardless of severity of disability, receive requested services.	N/A
9a.	CDDO identifies number of persons the Secretary of KDADS has determined inappropriate for community services because the person presents a clear and present danger to self of community.	<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 because the person presents a clear and present danger to self and community.	N/A

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"/>	CDDO Quality Assurance Procedures were included in Desk Review Materials, as well as with CDDO’s Policies/Procedures. Achievement Services “CDDO Quality Oversight Licensed Services On-Site Visit Checklist” is very thorough. Includes consumer interview, physical site checklist, file review, and service delivery verification. Results of all quality assurance procedures are typed and presented to QA committee. Overall, required regulatory requirements are met. CDDO Quality Oversight Checklist is considered to be a best practice.	Continue to partner with the state to educate and require affiliates to report in AIR. Critical incident Policy/Procedure should be updated to include requirement and instructions on reporting AIRs.
10a	CDDO maintains evidence that the same remediation and follow-up process is utilized for all CSPs for same services.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CDDO did not initiate any corrective action plans for CSPs so there were none to review. CDDOs Quality Assurance Procedures indicate the same remediation and follow-up process is utilized for all CSPs for same services. For FY16, documentation was provided to indicate the file review for Achievement Services for Northeast Kansas, Inc. did result in some non-compliance. Some of the TCM files contained outdated/incorrect ISPs, health assessments were outdated and some documents were missing. However, there were no errors found in	N/A

					the case files that could not be corrected. There were also some minor errors b/w the logs and the attendance for both day and residential. CDDO scheduled another review for a later date to take a second look at the areas where concerns were present. The CSP was able to correct the identified issues.	
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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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Gatekeeping policy and procedure provided outlines process which follows state guidelines. Policy states that CDDO will annually review individuals living in private ICF's in its catchment area.; A sign-off sheet will be available to document the delivery of the information; Annually, information regarding available community services will be mailed to the individual and their parent/guardian/family/support network so that they will be able to make informed choices regarding community services. KDADS requested sample, CDDO provided with sign-off sheets indicating all had annual notification letters sent/received.	Recommend annual letter include same language as choice form with statement "I understand that should I have any questions or seek more information about changing providers, I may contact either the case manager for my family member/ward or the CDDO Director with Achievement Services."

11a	Does CDDO have documentation of ICF/IID requests?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No documentation as CDDO has had no ICF/IID requests for admissions. There is Gatekeeping policy in place indicating CDDO has policy/procedure in place meeting regulatory requirements for Gatekeeping process.	N/A
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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 including, name, category, start date, end first term, date re-elected, end second term, and comments. There are 12 members, 7 consumer/guardian/family, 3 affiliates, 1 community member, and 1 CDDO member.	
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 community council members have terms expiring in the same year. May want to consider staggering terms in the future.

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. Attached to the policy/procedure there are Dispute Resolution Guidelines for the Council of Community Members. This outlines the process for disputes that arise from all the different circumstances. CDDO provided Quarterly Complaint Tracking Form, however, there have been no disputes to record in the last year.	Policy and Procedure does not address how individuals are notified of dispute resolution. Director indicated individuals are notified at time of BASIS and annually, consumers/guardians sign Person Served Rights & Dispute Resolution Form, but process is not outlined in policy.
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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CDDO maintains evidence that the dispute resolution process is made available and was provided. Director stated that process is made available at the time of BASIS, annually and upon request. CDDO provided sample showing consumer/guardian signatures on Person Served Rights & Dispute Resolution Form, indicating information was received.	Recommend including how individuals are notified of dispute resolution in updated policy and procedure.
13b	CDDO must maintain evidence of all incidence in which the dispute resolution process was initiated by any party.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CDDO has not had anyone request dispute resolution process. CDDO Director explained that they capture complaints/concerns on monthly reports to stay proactive and have resolved issues before they develop into a dispute. There is also a CDDO Quarterly Complaint Tracking Form uploaded to KDADS through the utility upload that was	Continue to ensure dispute resolution process is made available to all persons requesting it and to any persons whom a negative action has been initiated.

					provided.	
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"/>	There has been no dispute resolution data to trend. However, CDDO does upload Quarterly Complaint Tracking Form to KDADS to track complaints. Cathy also verbally described what sort of process the CDDO would to analyze this type of information.	Be prepared to start trending any dispute resolution data received by the CDDO.

CONSUMER/FAMILY INTERVIEW	Y	N	N/A	COMMENTS
14 total respondents				
1) Did you understand the eligibility application process? If not, please explain	4	0	1	1) Yes, CDDO was very helpful with any questions. 2) Yes, very informative.
2) Do you believe the eligibility determination process is understandable and timely? If not, please explain.	4	0	1	1) Yes, CDDO Director is very informative and helpful throughout the process.
3) Do you believe the service referral process (including options counseling) was timely? If not, please explain.	4	0	1	
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	2	1) Not sure, probably. 2) Yes, provided all necessary information throughout the process.
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?	3	1	1	1) Yes, had help from TCM 2) Yes, had some help
6) If currently receiving services, have you ever changed service providers? If so, how did you receive information about all your service options?	1	3	1	1) Yes, CDDO provided options. 2) CDDO provides choice forms with all available options on it. 3) Not receiving services.
7) If currently receiving services, do you know who to contact if you want to change service providers? If so, who?	4	0	1	1) Yes, CDDO. 2) Not currently receiving services, would call CDDO.
8) Do you have any other information regarding your interactions with the CDDO that you would like for us to consider?	2	0	3	1) This CDDO has always been helpful to us when we need assistance. 2) CDDO Director made sure to explain all that was needed and provided in depth information on all service options in our area.

COMMUNITY SERVICE PROVIDER INTERVIEW	Y	N	N/A	COMMENTS
14 total respondents				
9) Does the CDDO have an effective process for completing the annual BASIS assessment? If no, please explain?	6	0	0	1) Completes one month prior to person's served birth month.
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.	4	2	0	1) None that I've seen. 2) Cathy Montgomery is very knowledgeable and assisted me when I ask for her help. 3) Email or phone call.
11) Does the CDDO share information about your CSP with persons seeking services?	6	0	0	1) Good communication. Shared by email. 2) Provider list is provided to person served and questions are answered.
12) Does the CDDOs literature demonstrate impartiality regarding the CSPs in your area?	5	1	0	1) I have not received literature from the CDDO, so not sure how it's worded. 2) Person is provided provider list of all CSPs
13) Are you aware of communication in which the CDDO benefitted one CSP over another? If yes, please explain.	0	6	0	
14) Does the CDDO manage an effective process for persons to access your services? If not, please explain.	6	0	0	
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	1	0	
16) Does your CSPs grievance/dispute resolution process refer the person to the CDDO if the issue is unresolved? If not, please explain.	6	0	0	

CDDO STAFF INTERVIEW ANGELA DRAKE, 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"/>	Never.
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, only significant change was an affiliate who was providing TCM, but did not want to continue providing this service. The provider initiated that process.
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 type="checkbox"/>	<input type="checkbox"/>	Yes, affiliate meetings, representation on the Council of Community Members. Try to forward as much state information as possible, as soon as received.
20) Does the CDDO maintain separate in CDDO/CSP functions? If so, how?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Cathy stated that before she came on they were doing a good job at separating. There is a sign outside her office indicating CDDO. All CDDO files are kept in her office and she is the only one who has access/keys. Orders her own paper and supplies; phone/fax is same, but she also has CDDO cell phone. CDDO has own letterhead and business cards. Mass mailings are done by CDDO Director Cathy Montgomery.
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"/>	The concept can be difficult to explain. Usually if something comes up, it's around BASIS time. When providing options counseling and assisting with choice form, makes sure to explain the difference.
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"/>	That is the expectation. The main reason it would not occur is due to capacity. Homestead is a day providers, they market they serve people with behavior issues. Have to be handled case by case. There will be circumstances, the goal is to make adaptations to meet person's needs.
23) Does the CDDO QA process assure services are provided in a manner consistent with Article 64 including: Choice, Person-Centered, Rights & Responsibilities, Paid/Delivered, Third party payment responsibility, Report ANE? If so, how?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes, choice is a big deal for me. Really want people to have a say in regards to their services. Have a lot of one on one contact and conversations, giving personal attention to each consumer.
24) Does the CDDO inform persons and providers of the dispute resolution process?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Provided annually in the mail to both consumers and affiliates. Dispute resolution process is part of the paperwork received when coming in for BASIS.

If so, how?				
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"/>	Tier report is provided to case manager, provider and MCO when they do the BASIS assessment. Hands on approach is very beneficial, able to have personal relationships with every consumer since I perform all eligibility and BASIS. Have constant interaction with providers, stays updated and knows what is going on.
26) In your opinion, what are some areas your CDDO could make improvements.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Technology, would like to have a nice website. Do not have time to create newsletters, however, would like to provide quarterly newsletters again.
27) What CDDO function do you find to be the most challenging?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Eligibility, not a lot of direction from KDADS. When DSM4 changed to 5, there was not much discussion about how things changed. Would be nice if KDADS had a policy.
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"/>	Already started to change a lot of processes. Would like to get handbook and pamphlets together for families as a resource. Lean on Council of Community Members—what could change, what could grow, etc.
29) How does your organization measure your success? Specifically, what sort of data does your CDDO capture? How do you analyze the data?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Looks at QA checklist a lot to give an indication if people are satisfied with their services. A lot of things they do are not measurable. Collect data on how many are in services, how many changed providers, etc.
BASIS ASSESSOR INTERVIEW	Y	N	N/A	COMMENTS
SUSAN DAVIS, BASIS ASSESSOR				
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"/>	Following initial eligibility determination, tries to immediately schedule BASIS for those determined to be eligible. Initial BASIS can take a bet longer due to needing to gather more information, once initial is out of the way, people have a better idea on what exactly is needed. Annual BASIS, Cathy tries to do as much as possible ahead of time. Usually the only documentation she doesn't have ahead of time are the behavior tracking sheets. Has everyone sign the BASIS, does not like to change things after receiving/completing a BASIS.
2) Is the consumer always present for their BASIS assessment? If not, please explain why.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Though the answer is no, it is very rare that the consumer would not be present for assessment, it has occurred. She has had consumers leave part way through and had consumers refuse to attend. Initial BASIS must be completed with consumer.
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"/>	Personal goal is to always report BASIS information to KDADS within 3 days. Do as much work ahead of time. It is much easier to control timelines when it is just her.

4) What do you find to be the most challenging aspect of your position?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Getting the meeting scheduled. Arranging so everyone you need is in attendance. Sometimes it seems like there are way too many people at the table.
5) In your opinion, what improvements can be made to the assessor process?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Hard to say when there is a new tool in the works. Everyone knows that the tool does not capture everything, but would be difficult to capture everything. BASIS is working as well as it can work.
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"/>	Regional BASIS roundtable meetings. Would do anything the State would offer. Conversations with other assessors.

REBUTTAL

ACHIEVEMENT SERVICES FOR NORTHEAST KANSAS, INC. CDDO

DATE REBUTTAL RECEIVED: 03/28/2017

CDDO Director submitted rebuttal with two issues that were discovered on ASNEK Inc., CDDO's final report submitted 03/24/2017. Evidence reviewed and the final Peer Review Report has been updated to reflect the outcome of the rebuttal, which was supported.

- 1) Best Practice Recommendation #4 stated "It would also be helpful to include a place on the choice form so individuals can indicate they have received information about the dispute resolution process."
 - CDDO Director provided evidence with rebuttal that this practice is already in place (attached "Person Served Rights & Dispute Resolution" form). Form is signed at BASIS and annually.
 - KDADS Final Peer Review Report has been updated. Updates made to Best Practice Recommendation #4, Peer Review Tool Questions 13 and 13a to reflect changes.

- 2) Question #19 on CDDO Director Interview question included a typo. In the comments, it states, "Yes, affiliate agreements, representation..." CDDO Director actually stated and sentence was intended to read "Yes, affiliate meetings, representation..."
 - KDADS Final Peer Review Report has been updated.