



February 10, 2017

CDDO Peer Review of

Big Lakes CDDO

Review Team:

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CDDO REVIEW REPORT SUMMARY OF FINDINGS

Big Lakes CDDO Peer Review
February 10, 2017

1. GENERAL COMMENTS

The review team would like to thank the CDDO staff for time and hard work to prepare and coordinate the review making it a success. Big Lakes CDDO Peer Review was held February 10, 2017 at 9:00a.m. Big Lakes last Peer Review was conducted in 2011. Shannon Jennings currently serves as the Director of Big Lakes and was KDADS primary point of contact. Big Lakes submitted all the necessary documentation to KDADS timely and was very helpful throughout the entire review process.

2. IDENTIFIED STRENGTHS

1. Website – Big Lakes CDDO website at <http://biglakescddo.org/> is a very helpful resource when it comes to learning more about Big Lakes and CDDO processes in general. Local waiting list data is shared.
2. Policies are thorough and all CDDO activities and operations are spelled out. “Introduction – BLDC Department of CDDO Administration” Policy to mitigate conflict of interest between the CDDO and CSP was noticed by the review team. This policy helps to demonstrate to the state the CDDO is cognizant of the importance of keeping the two entities separate.
3. Of the CSP respondents surveyed, all reported high level of satisfaction with the CDDO.
4. BASIS Assessments are being completed and entered in to KAMIS timely. Big Lakes ensures accuracy of each assessment by having the Quality Assurance staff review the work. Once approved, the BASIS assessor enters completed assessment in to KAMIS.

3. RECOMMENDATIONS FOR CDDO

1. **Outcome 2: CDDO Maintains policy and procedure changes that are approved as required.**
Issue: It did not appear policies are being reviewed on an annual basis.

Recommendation: Would suggest reviewing policies on an annual basis. Include the state Adverse Incident Reporting System AIR “CDDO Informed of Critical Incidents Policy.” “I/DD State Hospital Admission for Persons with Intellectual/Developmental Disabilities” Policy needs to be updated to reflect current processes. “Right of Appeal and Dispute Resolution” Policy should be updated to reflect current processes (complaint tracking to KDADS).

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

Issue: Affiliate agreements and affiliate lists do not necessarily correspond.

Recommendation: Ensure affiliate agreements and affiliate lists align to ensure accurate information on services provided both in hard copy and the website listing.

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

Issue: There was little evidence provided to demonstrate Big Lakes affiliates have opportunity for input on CDDO area system management.

Recommendation: Opportunities should be expanded so affiliates are able to provide feedback to the CDDO through annual survey or however you’d like to satisfy this regulatory requirement.

4. Outcome 10: CDDO will maintain a locally developed impartial QA process that reasonably addresses regulatory requirements – Monitoring Activity 10.

Issue: CDDO accepts Critical Incidents in several different formats. CDDO presented no evidence of any follow up or remediation for critical incidents received. Number of critical incident reports the CDDO is receiving may indicate not all affiliates are regularly reporting. 4 reports provided for the month of November.

Recommendation: Have a uniform system for accepting critical incidents. Place more emphasis on the state Adverse Incident Reporting System as the primary system for reporting critical incidents. Have a plan in place to follow up on critical incidents. Please ensure all affiliates are reporting in AIR and participating in the local CDDO critical incident process.

4. RECOMMENDATIONS FOR KDADS:

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

Issue: Following a sampling of functional assessments, only 1 file was past 7 days of entry with no explanation.

Recommendation: KDADS finalizing BASIS and Waitlist Policy to provide more guidance for CDDOs to be able to measure the 7 day timeframe appropriately.

5. FINDINGS

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

Issue: The CDDO and CSP share the same phone number. There is no signage to clearly identify the CDDO from the CSP. Shared Position Descriptions do not clearly separate which functions are CDDO and which are CSP.

Recommendation: Continue to work on further separation of the CSP from the CDDO. Ensure staff who have both CDDO and CSP responsibilities understand the line and their position descriptions clearly outline the work they do for the CDDO versus the CSP. KDADS would like to see the CDDO develop a plan with timelines to ensure further separation in function.

2. 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: Big Lakes has no day or residential service options. All day and residential affiliates are at capacity and closed for referrals.

Recommendation: Refer to 30-64-25 “(b) The plan shall not require any community service provider to accept more persons than the community service provider can effectively serve. If all community service providers are at their maximum capacity, the CDDO shall, pursuant to K.S.A. 39-1805 (b), assist in establishing new community service providers. Big Lakes should present a plan to the state to work in coordination with all necessary parties to increase provider capacity.

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

Issue: CSP representative has been on the council for 9 year term. Unclear when Norm and Joyce Humes were appointed to their positions.

Recommendation: Ensure council members terms are in line with the regulatory requirements.

4. Outcome 13: CDDO maintains an effective dispute resolution system that meets the regulatory requirements – Monitoring Activity 13a.

Issue: No evidence was presented to indicate dispute resolution process is being made available to all persons requesting it and to any persons whom a negative action has been initiated.

Recommendation: Ensure dispute resolution process is being made available to all persons requesting it and to any persons whom a negative action has been initiated.

5. Outcome 13: CDDO maintains an effective dispute resolution system that meets the regulatory requirements – Monitoring Activity 13c.

Issue: No evidence was presented which may indicate Big Lakes is trending dispute data.

Recommendation: Ensure there is a system in place to trend and digest the information CDDO receives related to disputes.

6. BEST PRACTICE RECOMMENDATIONS:

1. Individual Rights and Responsibilities Policy does not refer people to the appropriate place if they feel their rights have been violated.
2. Big Lakes Policies are password protected which makes it difficult for consumers and family members to obtain information should they want to do so.
3. Re: the Basis cover sheet, it may be helpful to add a field on the form to reference the KAMIS entry date as it may be easier for the CDDO to keep an eye on the 7 day timeframe. Also, Basis cover sheet reads “Client in Attendance.” This implies the consumer may not have to be present for the assessment. Would suggest removing this field on the cover sheet.

SUMMARY: Overall the review identified many CDDO strengths with the opportunity for improvement but being a positive review in whole. Big Lakes is welcoming and accommodating, filled with people that are experienced and caring that is a great asset to their program. Those involved were prepared and organized showing respect and eagerness to help and assist the team in any way possible.

Peer Review Tool

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"/>	CDDO and CSP policies are distinct. Policies are detailed and well thought out.	CDDO Informed of Critical Incidents Policy has no mention of AIR Would like to see update of the policy to reflect the AIR reporting system requirement. Suggested that some sort of system is implemented to review policies on an annual basis.
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 does not distribute either an electronic or hard copy newsletter – not applicable.	
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"/>	Website content does ensure impartiality of CSPs. There is nothing to indicate any sort of favoritism of one CSP over another. Big Lakes LLC has a separate website from Big Lakes CDDO. All CSPs are listed, but do need updated.	

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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CDDO is not being held accountable to	N/A

	performance improvement plan. CDDO maintains data in a manner that allows evaluation.				this regulation this peer review cycle.	
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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Shannon indicated there have been no major changes in policy.	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"/>	CDDO has current affiliate agreements for each affiliate.	Advanced – Community Alternatives has no signature listed on page 15. No mention of Funk Medical Mobility and Taylor Drug on affiliate list or on website. Need to remove Mosaic as an active provider on affiliate list and website. OCCK not listed at TCM on master affiliate list. Tarc Inc. Children’s

						Residential should be listed under “Children’s In-home support services providers for voluntary placement”
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Mosaic cancelled, action consistent with regulatory criteria. CDDO provided email/s between CDDO, provider and licensing showing proper procedures utilized to end agreement. Also, mention of Equiventure Farms cancelling affiliation.	At the time of review, Mosaic was still listed on website as an active affiliate. Re: Equiventure Farms, there was no evidence provided to determine if proper regulatory criteria was utilized to end this agreement.
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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Of the 14 files sampled, only one was outside the 7 day range. Review team measured from day of the in person assessment, through “Work in Progress” status to “Work in Progress approved”	Continue to strive for the 7 days from the date of the in person assessment to completion of entry into KAMIS. You may consider adding a “KAMIS entry field” to your BASIS cover sheet.
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"/>	CDDO Provided example of abbreviated samples of all crisis/exception requests. Documentation indicates process/procedures meet state guidelines.	
3d.	Following a sample of eligibility determinations, do CDDO processes/procedures meet state	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All assessments/reassessments reviewed occurred within the stated timeframe. There is a signature choice form that is	

	guidelines? For example, was each person provided with “comprehensive options counseling?” Is the functional assessment/or reassessment occurring within the stated timeframe?				included with all assessments/reassessments that indicates they were provided the full array of affiliated services available and constitutes no guarantee of services or providers. They verify they have been informed in writing of available service providers in their CDDO area. KDADS provided CDDO with random sample, those sampled all had signed choice forms and functional assessment/reassessment occurred within the stated timeframe.	
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 provided all case transfers inside and outside CDDO catchment area. CDDO has form for consumer to request for New/Change in services. Change in service documentation includes Annual Community Service Provider Choice Listing Form, which is signed by consumer/guardian. Form outlines consumers currently funded services with plan of care approved units. Processes/Procedures meet state guidelines.	
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"/>	Reviewed every available affiliation agreement. All were uniform including Big Lakes CSP.	

		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
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"/>	Yes, but opportunities could be expanded. Other than Affiliate Meetings, we saw no other evidence.	
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"/>	CDDO has 5 individuals who work for both the CDDO and the CSP including: Human Resources Director, Accountant, Office Manager/Executive Assistant, Accounts Receivable, Payroll Specialist and IT Supports Specialist.	
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"/>	There are personnel who work for both entities. The Policy/Procedure to mitigate conflict of interest is considered a strength; BLDC has established a separate but affiliated Department of CDDO Administration. Separate files, fax, database.	Recommend position descriptions clearly separate which functions are CDDO and which are CSP. The CDDO and CSP share the same phone number. There is no signage to clearly identify the CDDO from the 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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CDDO has a policies and procedures approved in accordance with Article 64 requirements which can be found in Affiliate Referral Protocol and Affiliate	

	CSP affiliation process, and states the affiliation requirements. Evidence of a policy/procedure and it is followed.				Information Protocol. Copy of affiliate agreement indicates all affiliation requirements.	
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 areas are met in the affiliate agreement except the monitoring of current affiliate agreements as Mosaic was still in the file and listed as an option on the choice form but they are no longer affiliated. There was evidence of a process for affiliation and its monitoring.	

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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Sampled 20 files. 100% of files reviewed contained signed Choice forms to indicate all service options were shared.	Suggestion would be to add a Rights and Responsibility form that all persons could sign and implemented into the process.

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"/>	Reviewed State Aid Allocation Protocol and Service Access List Protocol. State Aid Funded List provided detailed tracking for funds. At the present time, Big Lakes is the only entity receiving the funding. Policies outline the process for accessing funding, what to do in the event you lose funding or have a change in services.	

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"/>	Reviewed CDDO Liaison Policy, training records and training certificates. Meeting minutes provided to show CDDO developed a training program approved by COCM (Departmental meeting notes provided, as well as regional eligibility meeting minutes). Meeting minutes indicate ongoing training. Evidence/Documentation was provided showing eligibility staff have completed identified requirements. CDDO Liaison Training checklist lists all training topics that must be completed within 90 days of employment.	They have filed records with all recorded trainings.
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"/>	Evidence suggests policies and procedures are implemented as written.	

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"/>	CDDO supplied documentation titled "Service Provider Choice Tracking 2016". KDADS sampled 20 consumer files for Choice Tracking list. Evidence provided for consumers on this list indicates notifications maintained (provided emails and choice forms). Providers and MCO notified by email (provided) of initial provider choice and transfers with the signed choice forms attached. Signed choice forms are filed in consumer's electronic file and uploaded to consumer documents in BCI.	

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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	One Big Lakes provider does specialize. Referred to page 8 of affiliate agreements which references Discrimination statement.	There are no day or residential service options. All are closed for referrals. Big Lakes should develop a plan to increase provider 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"/>	Big Lakes 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, and Rights & Responsibilities, Paid/Delivered, Third Party payment responsibility and ANE reporting information?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Review of Quality Assurance Committee Meeting Notes. QA Process does address the required regulatory requirements.	<p>Quality Assurance Committee is not reflective of the team composition as outlined in the Policy. There is only one CSP participating in the committee.</p> <p>CDDO accepts Critical Incidents in several different formats. Would encourage CDDO to have a uniform system. The electronic critical incident does not indicate whether an AIR form was completed. It would be helpful to separate out APS from CPS on the form for tracking/trending purposes. CDDO did not provide evidence they are tracking / trending data for quality analysis. There was no evidence of follow up by the CDDO on critical incidents received. Four incident reports were received in November 2016. KDADS does not know for a fact, but this number seems low suggesting all affiliates may not be reporting as necessary.</p>

10a	CDDO maintains evidence that the same remediation and follow-up process is utilized for all CSPs for same services.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A because there were no corrective action plans to review.	
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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"/>	Reviewed all files, letters sent, and all information sent. Provider choice was present.	
11a	Does CDDO have documentation of ICF/IID requests?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes, had one individual.	I/DD State Hospital Admissions for Persons with Intellectual/Developmental Disabilities is not reflective of current state processes. Needs to be updated.

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"/>	Yes	
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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The Council Member list is not updated. Still has Cindy Wichman as the Chair Person. The CSP representative has been on group for 9 year term (exceeds limit). Listing does not show when Norm and Joyce Humes were appointed to their terms.	Suggestion that the list and members are current and within term guidelines for Council.

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"/>	Big Lakes has a Dispute Resolution Policy. Director indicates they provide information initially and annually at time of Basis assessment.	The Dispute Resolution Policy has not been reviewed since 4-1-2013. The policy needs updated to reflect current complaint tracking process to KDADS. The policy indicates notice is given initially on how to dispute something but does not address annual notification of dispute resolution. Rights are not specific; it mentions "You can file a complaint." Please clarify how to file a complaint. Also, to add to the website the process of filing a complaint for public information. The Policies are online on the website but are not easily accessible by public due to being password protected.
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 checked="" type="checkbox"/>	<input type="checkbox"/>	Evidence not found.	.
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"/>	Big Lakes is utilizing KDADS Quarterly Complaint Tracking as evidence for tracking disputes/grievances. Presented one complaint dated 7-12-16.	
13c	CDDO must evaluate the collected data in effort to utilize trends to improve the CDDO system.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Not demonstrated CDDO is trending information.	Not reviewed at Quarterly Meeting to show if there is any trending.

CONSUMER/FAMILY INTERVIEW	Y	N	N/A	COMMENTS
14 total respondents				
1) Have you ever changed service providers? If so, how did you receive information about all your service options?	6	4	7	1) N/A, Need more Providers in area. 2) N/A, On wait list x2. 3) Yes, researched herself and called Big Lakes.
2) Did you receive information on all service providers in your area when you found out you had funding and could begin to the process of selecting a provider?	5	6	6	1) Yes, received information. x2 2) NO, chose to stay with current Provider, did not need list. 3) N/A, just got Medical Card and is going to pick TCM, then will look at list. 4) N/A, on waitlist x2.
3) Do you know who to contact if you want to change service providers? If so, who?	9	4	4	1) 9/17 stated that CDDO is who to contact if they want to change service providers. 2) 8/17stated that they do not know who to contact.
4) Do you believe the eligibility determination process is understandable and timely? If not, were you kept informed about the reason for any delay? If not please explain. (Interviewer: Review the definition of “eligibility determination process” prior to asking this question.	12	7	0	1) Yes, but it took 4 – 6 months to get on wait list. 2) Yes, only 1 or 2 accepting clients.
5) Did you understand the eligibility application process? If not, please explain.	14	2	0	1) Yes, after they explained it x2. 2) Yes, had to ask questions.
6) Do you believe the service referral process was timely? If not, please explain. Reference definition of service referral.	12	3	0	1) “No” 2) No, did not go through service referral process due to insurance policy.
7) Are you aware that you can appeal or request a review of a decision made by your CDDO? If not, explain.	10	3	1	1) No, not aware of appeal rights or that I can request for review of decision made by CDDO. 2) No, not receiving services.
COMMUNITY SERVICE PROVIDER INTERVIEW				
14 total respondents				
8) Does the CDDO have an effective process	8	0	0	1) Yes, The CDDO is pretty easy to contact.

for completing the annual BASIS assessment? If no, please explain?				2) Yes, done 1 month prior to clients birth month.
9) 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.	7	1	0	1) No, CDDO does not request input on their policies. They do not provide information about changes at the state level.
10) Does the CDDO share information about your CSP with persons seeking services?	7	1	0	1) No, closed in the area. 2) Yes, at affiliate meetings.
11) Does the CDDOs literature demonstrate impartiality regarding the CSPs in your area?	8	0	0	1) Yes, I have reviewed the CDDO literature.
12) Are you aware of communication in which the CDDO benefitted one CSP over another? If yes, please explain.	0	8	0	1) Yes, "N/A."
13) Does the CDDO manage an effective process for persons to access your services? If not, please explain.	14	0	0	
14) 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?	7	1	0	1) No, we haven't received anything in quite some time. 2) Yes, I don't know. 3) Yes, don't know.
15) Does your CSPs grievance/dispute resolution process refer the person to the CDDO if the issue is unresolved? If not, please explain.	6	2	0	1) No, our contracts are directly with the individuals. 2) No, CSP grievance process goes through the Case Manager, to the Case Management Director, to the President/CEO and if still not resolved on to the Board of Directors.
CDDO STAFF INTERVIEW	Y	N	N/A	COMMENTS
SHANNON JENNINGS, DIRECTOR				
16) 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"/>	No, Have not, just Mosaic who was unable to get a permanent license.
17) Has the CDDO cancelled/suspended an affiliate agreement? If so, was the	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No. Equiventure cancelled their agreement due to not enough business in the area. They did have an affiliate agreement and they did have people participate, but just was not

appropriate regulatory criteria applied?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	enough.
18) 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, Affiliates are provided everything, State policies, provide affiliates with outcomes of the quarters, Affiliate Meetings while keeping affiliates updated with meeting minutes and allow opportunity for input. The CDDO is trying to get more people to the meetings.
19) Does the CDDO maintain separate in CDDO/CSP functions? If so, how?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes, done a good job of being separate. They have a separate fax machine located in the CDDO Director's office. Offices are separated from the CSP offices. Files are stored in their own offices. Maintain a separate database and website. Although, they have no separate signage.
20) 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"/>	Yes, by explaining which functions are which to families. Inform at the initial eligibility meeting the difference between CDDO and CSP. Let people know who to contact in regards to both CDDO and CSP.
21) 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, There are a variety of disability and behavior challenges. One provider was able to serve an individual with required a trach tube.
22) 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, CDDO staff conducts home visits with Quality Assurance Committee that is in a manner consistent with Article 64. They are behind in visits but are picking up. Some Case Managers are making visits in people's homes. It was mentioned that they do AIR reporting.
23) 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"/>	Yes, This process is reviewed at every BASIS Assessment and Initial Eligibility. The clients Rights and Responsibilities along with how to initiate the dispute resolution process is reviewed.
24) 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"/>	Experienced staff, Lots of Queries, very approachable staff, easy to find information on different topics, and staff work very well with all involved. She was surprised not to find as much trending type data. Staff is welcoming and consumers look forward to interacting with staff.
25) In your opinion, what are some areas your CDDO could make improvements.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There could be a signature added to the Rights and Responsibilities form. Need more service providers in the area, but unsure of the best way to recruit more. It would be nice to have more Day and Residential options. They have not had any calls from anyone.

26) What CDDO function do you find to be the most challenging?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The waiting list, people who needs crisis funds but providers are at capacity, and no openings for day and residential services.
27) 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"/>	Building capacity, hopes for more funding, and to coordinate with other counties and CDDO's.
28) 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"/>	Collect a lot of data, monthly reports, new people added, people who have accessed service, and school contracts would be beneficial.
BASIS ASSESSOR INTERVIEW	Y	N	N/A	COMMENTS
MELISA REEDER, 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"/>	Russell does all initial assessments. BASIS assessor keeps track of annual assessments / reassessments with monthly tracking database. Crosschecks with client, BASIS and KAMIS databases. Russell (QA) double checks work, while "work in progress" in KAMIS. Once cleared, BASIS assessor enters and approves assessment in KAMIS. This ideally happens in 7 days after the BASIS is completed.
2) Is the consumer always present for their BASIS assessment? If not, please explain why.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes, 99% of consumers are present for the BASIS. Some examples of when this may not happen is when a consumer may be sick, have a behavior, or school activity. They will only conduct BASIS without consumer if their guardian is available and present. If the consumer is their own guardian and cannot be available, they will not conduct the BASIS.
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"/>	Yes, ideally. Most times they are reported in agreed upon timeframe. Sometimes they do have to wait on additional documentation.
4) What do you find to be the most challenging aspect of your position?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Meeting agreed upon timeframes.
5) In your opinion, what improvements can be made to the assessor process?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Mobile work stations would make for easy access to information, not on paper to make it a more fluid process.
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"/>	KDADS training, Interhab, and BASIS Assessor Roundtable Meetings.