



September 12, 2017

CDDO Peer Review of CDDO of Butler County

Review Team:

Linda Young, KDADS

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Tara Cunningham, Director, New Beginnings
CDDO

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CDDO REVIEW REPORT SUMMARY OF FINDINGS

CDDO of Butler County
September 12, 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. The CDDO of Butler County Peer Review was held on September 12, 2017 beginning at 8:30a.m. Prior to September 12, 2017, the CDDO of Butler County was last reviewed on February 6, 2013. Currently Nicole Hall serves as Director of the CDDO of Butler County and she 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 the on-site review. The organization of on-site review materials was very helpful and much appreciated.

2. IDENTIFIED STRENGTHS

1. CDDO Involvement in Early Childhood Intervention Programs- The CDDO is very heavily involved in several early childhood initiatives and focused on the early identification of individuals with potential I/DD concerns. The CDDO indicates that they work well with the local school districts and they are sometimes invited to IEP meetings to educate parents about the services that are offered in the community and through the CDDO itself. It appears the CDDO has worked to establish key community partner relationships throughout their catchment area to ensure that they have a more effective outreach to ensure early intervention and identification of individuals is provided.

2. CDDO Creative Use of County and State Aid Dollars- The CDDO has found very creative ways to utilize their county tax and state aid dollars to supplement and support identified individuals/families in their catchment area. The uses of these funds may include the purchasing of TCM services for those not eligible for Medicaid. Also, they consider the purchasing of incontinence products for some individuals three or older, assistance with summer camp opportunities, etc.

3. Staff Responsiveness and Commitment to the Delivery of Services – KDADS received several complimentary comments from parents/guardians of individuals who had went through the eligibility process indicating that they found the

CDDO staff to be extremely approachable, responsive and helpful in the identification and linking of these individuals to resources within the community (as well as to CDDO resources) which might be helpful to meet the needs of their loved ones.

4. Quality Assurance Program- The CDDO has an extensive Quality Assurance Program which is multi-faceted and addresses many different tools to measure and evaluate success with its affiliate network. The CDDO itself is conducting the Quality Assurance Program with the Director going and completing on-site visits, including file reviews, staff and client interviews and observations of different programs. Information is being tracked and trended to analyze potential system improvements.

5. Dissemination of Annual Newsletter – The CDDO distributes an annual newsletter to all individuals/parents/guardians receiving services within the Butler County catchment area. The last newsletter focused on CDDO changes, State changes, significant events, and it included information about rights/responsibilities as well as information on the local CDDO Dispute Resolution Process.

3. RECOMMENDATIONS FOR CDDO

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

Issue: The CDDO had an outdated appendix attachment for Flint Hill Services affiliation agreement.

Recommendation: The CDDO needs to update this attachment to reflect the current services being provided by this affiliate.

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

Issue: The CDDO was sending a notification letter regarding approval or denial for crisis/exception requests, but the letter was generic and did not include a specific header to indicate who the information was being sent to. The review team was unable to determine if the appropriate parties were receiving the appeal rights if they were denied services.

Recommendation: The CDDO needs to add the specific entity information of who they are sending the letters to for this population on all future correspondence.

3. Outcome 6: Access to HCBS and Day/Res State Aid Funding is not dependent on the person’s chosen service provider-

Issue: The CDDO currently has no formal policy/procedure on Fiscal Management or how they make decisions on how they distribute their state aid funding. The CDDO did have a “Funding Section” in their internal processes manual, but it focused

more on the process for making/applying for flexible funding requests and this section did not outline how the CDDO determines its' criteria for how it decides its' funds will be distributed annually.

Recommendation: KDADS would like to see a formal process or policy developed to address the fiscal management and/or state aid issue.

4. 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.

Issue: The CDDO had a policy which indicated that affiliates could not discriminate based on an individual's level of severity, but this specific language was not found in the affiliate agreement itself.

Recommendation: KDADS would expect that this specific language would be added to the affiliation agreement.

5. Outcome 10- CDDO will maintain a locally developed impartial QA process that reasonably addresses regulatory requirements.

Issue: The CDDO is tracking several items as part of their local QA program; however, they are not tracking/trending Critical Incident Reports. Also, the CDDO might consider amending their Critical Incident report form to include a checkbox to indicate if the CSP provider completed an AIR report as well. Also, if the Director continues to be the only individual completing the QA reviews, the QApolicy should be updated to reflect the current practice that the COCM is not really involved in this part of the QA monitoring process.

Recommendation: KDADS would like the CDDO to consider these additional recommendations to further enhance its' quality assurance system. Also, consider if the Quality Assurance Policy needs to be further updated to reflect current practice.

4. FINDINGS

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

Issue: The CDDO had no formal process in place to gain or solicit input regarding their CDDO area system of operations. There was no documentation of Affiliate Meeting Minutes.

Recommendation: KDADS would like to see the CDDO develop a plan with timelines to address this issue. The plan will be due to KDADS within 30 days of receipt of this report.

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

Issue: The CDDO shares two staff positions with Flint Hills services. A review of the shared position descriptions does not indicate a clear description of what duties these staff perform for the CDDO and what duties these staff perform for the CSP. It is also recommended that the CDDO develop a formal memo of understanding or contract with Flint Hills regarding payment amounts for these two service positions. At this point, the CDDO is just invoiced for these services monthly. The CDDO also indicated that they do not have any formal strategic planning process in place for CDDO operations.

Recommendation: KDADS would like to see the CDDO develop a plan with timelines to address this issue. The plan will be due to KDADS within 30 days of receipt of this report.

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: KDADS reviewed a sample set of seven files. It appears the CDDO is not using the correct set of rights for this population. The Article indicates that the CDDO should be informing individuals of their “rights pursuant to the Developmental Disabilities Reform Act”. The rights utilized appeared to be a more personal set of rights. Also, the CDDO was not keeping copies of the letters sent out to these individuals in this category, but were keeping labels instead. KDADS would like to see copies of the letters maintained as evidence this probe is being fully completed.

Recommendation: KDADS would like to see the CDDO develop a plan with timelines to address this issue. The plan will be due to KDADS within 30 days of receipt of this report.

6. BEST PRACTICE RECOMMENDATIONS:

1. As far as the agency website, the CDDO may want to add a link to the AIR reporting system and basic information for the lay person on the CDDO’s dispute resolution policy and how to access it. (in a policy now on the website; however, it may not be easily found by those browsing the website).
2. The CDDO should consider scheduling a routine planned visit with their QMS licensing staff representative to increase communication regarding any affiliate issues or concerns.
3. The CDDO may want to consider adding the target expiration date to the COCM membership list for any active members on the council. The CDDO should also add the CDDO representative’s name to the COCM membership list as well.

SUMMARY:

This review identified many CDDO strengths as well as opportunities for improvement. The CDDO of Butler County staff was very organized and accommodating. Overall, the CDDO does a great job meeting state requirements. The CDDO staffs' knowledge, experience and in-depth involvement are beneficial to all involved with the process.

Peer Review Tool

Review Team Members:

- 1) Linda Young, PICS, KDADS
- 2) Colin Rork, PICS, KDADS
- 3) Kimberly Feldt, KDADS
- 4) Tara Cunningham, Director, New Beginnings CDDO
- 5) Venessa Roberts, TCM Supervisor, ResCare
- 6) Nicole Fleming, Advocate

Date of Review: September 12, 2017

CDDO Name: CDDO of Butler County

CDDO Address: 2101 Dearborn Street, Suite 301, Augusta, KS 67010

Contact Person: Nicole Hall, Director

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Email: Nicole@cddlbutlercounty.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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The CDDO of Butler County is affiliated with Flint Hills Services; however, they have independent policies from the CSP organization.	No concerns noted.
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The CDDO does an annual newsletter mailing which is sent to every individual and their guardian who has been determined eligible with Butler County listed as their home county. The newsletter was found to be well organized and was easy to read. The newsletter contained general information about state level changes regarding I/DD services, as well as local level updates. The newsletter also included information listing an organizational chart of all affiliated service providers which included the CSP contact information, consumer's rights/responsibilities, dispute resolution and information on how to access the CDDO website for information, events and meetings. It also featured a disability awareness month luncheon which had been held locally.	One small error was noted on the CSP organizational chart under the header Mosaic... Shared living for day, residential and.... (the rest of the sentence is missing).
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"/>	The CDDO has an independent website from the CSP organization. The website was easy to navigate and it appeared to	Please consider adding a link to AIR. Please consider adding information for the lay person on dispute resolution (it is in

				<p>be very helpful for all involved, from those interested in services, to those who have been receiving services. Along with general information, there is a space titled "Listing of Meetings" which outlined upcoming meeting notifications. The Community Council meeting included a RSVP tab for anyone interested in attending. The service options tab defined each unique service. The "How to Apply" tab which was laid out in a question/answer format was easy to understand and explained the application process. The website included the CDDO staff, their job duties and their contact information. Board members were also listed and identified. The CDDO "links" section on the home page was also informative. The links included information about the CDDO finance plan, processes for capacity building and incentives to enhance services. CDDO policies, forms, affiliate contract and CSP information was included in the website. Links to community resources, such as the DCF hotline number were included. Recruitment for the COCM was listed.</p>	<p>the policy, but may not be easily found by someone browsing the site).</p>
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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"/>	The CDDO submitted both current and draft policies, which were being updated for the CDDO Peer Review. The review team chose to review the “Draft” policies for this peer review process. Public comment on these policies was recently completed and the CDDO provided evidence of the public notice period and review of the policies by the COCM and board of directors.	<p>Since KDADS chose to review “Draft” policies, KDADS will be generally providing their feedback on these “Draft” policies in a separate document, so that the CDDO can consider and incorporate that feedback into these policies prior to submitting them into KDADS for the final approval.</p> <p>If there were specific concerns regarding policy language as it relates to a specific question probe on this peer review tool document, that feedback will be listed in this document as it pertains to the probe itself.</p>

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"/>	The CDDO provided the review team with current affiliate agreements for all affiliates for the on-site portion of the review. All agreements have been signed since 2015 to the current year. All agreement appendix attachments were accurate, except for one provider. The affiliate agreements executed matched the services listed on the options counseling provider choice form.	Recommendation: Please update the Flint Hills attachment to reflect the current services they offer.
3a.	If the CDDO has cancelled or suspended an affiliate agreement, was	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CDDO has not cancelled or suspended any affiliate agreements.	N/A

	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.					
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 reviewed a random sample of 19 individuals who had BASIS/functional assessments in the last year. The CDDO provided evidence showing that BASIS/functional assessment information was entered into KAMIS in the agreed upon timeframe for all individuals sampled. The CDDO also had internal processes outlined as to how they handle the Basis/Functional Assessment process and their Re-determination of Eligibility process.	No concerns.
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 5 crisis/exception requests. Also reviewed was a spreadsheet of those seeking crisis services and their tracking information. Evidence provided indicates CDDO is following crisis and exception process as outlined by KDADS for those approved for crisis funding. Requests appeared to be processed in a timely manner. All denials contained information which outlined appeal rights; however, the	Recommendation: Please add an individualized header on the notice letters indicating who you are sending them to. Since this information was excluded, KDADS was unable to determine who appeal rights/dispute resolution information were being sent to.

					letters did not contain who the specific information was being sent to.	
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"/>	<p>The CDDO has a policy “Single Point of Application”. This policy was reviewed. The CDDO provided a spreadsheet list of individuals who had eligibility determinations over the past year. A sample set of 8 files were selected for review of this indicator.</p> <p>Processes/Procedures meet state guidelines and evidence shows they are implemented as written. The review of the files indicate that individuals are receiving comprehensive options counseling through face to face meetings. Initially, all options are shown and the individuals chooses what services they wish to receive. An informational intake packet is given to each individual/guardian which includes pamphlets of all TCM providers upon intake eligibility and information about other service options. The provider “org chart” listing the various providers was very unique and listed all providers and the services they were approved to provide. Those denied eligibility were advised of their appeal rights.</p> <p>Information was entered into KAMIS appropriately and all eligible files had the appropriate options counseling forms signed.</p>	No concerns.

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"/>	The CDDO has a “Continuity and Portability of Services” policy. KDADS sampled 6 provider case transfers inside and outside the CDDO catchment area. The team reviewed the CDDO Area Transfer Form document, referral and transfer checklists and the Notification of Options Counseling form. The transfer forms reviewed were consistently signed by the receiving CDDO entity. Evidence demonstrates CDDO processes/procedures meet state guidelines.	No concerns.
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 are uniform for like services. There is no evidence any agreement extends advantages not offered to other CSPs, and no evidence that the sponsoring CSP is extended any advantages.	No concerns.
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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The CDDO did provide evidence that they held quarterly affiliate meetings; however, the CDDO has not been taking any formal minutes of the meetings to document topics discussed. The Affiliate meeting agenda items were reviewed and there was no standing agenda item to solicit feedback from the affiliate network. The CDDO indicated that they have not implemented any surveys to gather feedback, nor have they had any official workgroups to gather affiliate	The CDDO needs to identify ways to engage their affiliate network to gain feedback about their operations and/or to engage their affiliates on issues which are unique to their catchment area regarding service gaps. This might be accomplished through Survey Monkey or through anonymous surveys or through various workgroups to address issues pertinent to the catchment area. Information identified system wide through the QA process may also be areas in which the CDDO may

					<p>feedback on CDDO operations or items which might be system-wide issues. There was a great deal of evidence to show that the CDDO does a good job of notifying their affiliates of changes in state or CDDO policy, etc.</p>	<p>need to organize workgroups to solicit feedback into their overall operations. Formal minutes of affiliate meetings should also be kept. KDADS will be issuing a finding on this item. KDADS would like to see the CDDO develop a plan with timelines to address this issue. The plan will be due to KDADS within 30 days of receipt of this report.</p>
3h.	<p>Does CDDO have any individuals who work for both the CDDO and the CSP? If so, review a sample of PD's.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The CDDO does share two positions with Flint Hills services. These include the Chief Financial Officer and the Human Resources Director. The CDDO receives a monthly invoice for these services and pays \$1,200 dollars per month to the CSP however, there is no formal agreement in place to indicate this arrangement.</p>	<p>Concerns noted below.</p>
3i.	<p>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.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The CDDO has a separate name from the CSP and it is located in a different town than the CSP. The CSP Director and the CDDO Director are considered equals and they each report directly to the Flint Hills Services Board of Directors. They do share a common Board of Directors. The CDDO does indicate that the Board holds a board meeting for the CSP one month and then typically the next month, they hold one for CDDO operations. The CDDO Director however, did indicate that there are times she has had to present information to the Board at the routinely scheduled CSP Board meeting, and minutes of these meetings do indicate</p>	<p>The shared position descriptions do not clearly designate what job duties are devoted to CDDO operations and which job duties are devoted to CSP operations. These should be separated out more clearly. It was also recommended to have a memo of understanding or a formal contract to document the arrangement for the compensation of the shared positions and the annual amount the CDDO is agreeing to pay for this support from the CSP organization. The CDDO also indicated that they do not have any type of formal strategic planning process in place for CDDO operations. KDADS will be issuing a finding on this item. KDADS</p>

				that this periodically is occurring. Also, the CDDO Director indicates that she routinely does attend the CSP Board Meetings when they are held. The CDDO indicated that the CSP does strategic planning, but the CDDO is not involved in this process. The CDDO has its own separate bank account, a separate budget, a separate set of quick books and the CDDO staff initiate payment of their own bills. The CDDO has its own fax and phone lines, own computer systems which the CSP does not have access to, own letterhead, they have their own website (which the CDDO indicates they provide upkeep for) and they have proper CDDO signage at their physical location.	would like to see the CDDO develop a plan with timelines to address this issue. The plan will be due to KDADS within 30 days of receipt of this report.
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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"/>	The CDDO has a policy “Affiliation Process” which outlines the process for affiliation. The policy addresses the affiliation process and states the general affiliation requirements. The CDDO keeps a spreadsheet with required documentation which indicates where the proposed affiliate is at in the affiliation process. When a potential affiliate makes an inquiry about affiliation, the CDDO mails out the Affiliation Agreement Requirements packet.	No concerns.

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"/>	The CDDO has a policy “Affiliation Process” which outlines the requirements. The affiliate spreadsheet was reviewed and showed that there were a few current affiliates showing interest in on-boarding at this time. The affiliate file shows monitoring of the affiliation process.	No concerns.
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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"/>	The CDDO has the “Provider Change Process” form and the internal “Provider Change/Choices” process outlined. They have a service/provider options form which identifies all the choices within the affiliate network. The form was accurate when reviewed. Also, upon intake eligibility, the CDDO mails a packet of information to the individuals/guardians which also includes information about service options, as well as other information.	No concerns.

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"/>	The CDDO supplied Quarterly State Aid Tracking reports. The CDDO is currently distributing the funds impartially and is distributing funds within the approved categories. All funding is expended annually.	Recommendation: The CDDO has no policy/procedure on Fiscal Management or how they make decisions on how they distribute their state aid funding. These items need to be developed. The CDDO did have a “Funding section” in their Internal Processes manual however this

						section appears to focus more on the process of how to request flexible dollars provided from their local county and state aid dollars and the information does not focus on how the CDDO makes decisions on the distribution methods used for their state aid dollars.
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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"/>	The CDDO had a policy "Training on Eligibility Determination" which outlined what their training requirements are for eligibility staff. The CDDO had documentation in their personnel files of when training was completed (2011). There have been no changes in the staff who complete these job duties since that period of time.	No concerns.
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"/>	The CDDO had a "Provider Change Processes Policy". They also had a procedure outlined in their internal processes manual. The processes manual provides step by step instructions of the process. Feedback from the interviews completed with guardians seems to support that the CDDO is implementing these policies/processes as written. The CDDO uses a Client Transition Questionnaire form for the transition process. This form appeared to be very comprehensive.	No concerns.

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"/>	A sample pull of 8 files were reviewed. The “Provider Change Processes” policy was also reviewed. From the sample set reviewed, it appears the CDDO is implementing the policy as it is written. Also, consumers sampled had a completed choice form with an appropriate signature being obtained from the individual/guardian. The CDDO did a good job of providing follow up emails to TCM/care coordinators regarding any changes which were completed.	No concerns.

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"/>	The CDDO has “Uniform Access to Services” policy which states that affiliates can specialize, but cannot do so based on an individual’s severity level of their disability. This language was also found in the current and proposed affiliation agreement. The options counseling choice form also is marked if an affiliate is currently capped for the acceptance of new referrals.	Recommendation: No specific language was found in the affiliate agreement regarding the requirement to serve individuals regardless of their level of severity. The language was found in the policy. Would recommend that the CDDO add this language in their affiliate agreement as well.
9a.	CDDO identifies number of persons the Secretary of KDADS has determined inappropriate for community services because the	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The CDDO has not had any persons the Secretary of KDADS has determined inappropriate for community services	N/A

	person presents a clear and present danger to self of community.				because the person presents a clear and present danger to self and community.	
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"/>	The CDDO has a policy “Quality Oversight and Enhancement”. The policy indicates that the CCDO staff and/or members of the Community Council will do on-site reviews and records reviews for 20% of all individuals receiving case management plus at least one additional funded service. At this point in time, the CDDO Director indicated that she primarily is doing all the site visits and the COCM is not really involved in the on-site check process at this time. The CDDO has developed several checklists to complete during the reviews. These include Day On -Site Reviews, Residential Site Reviews and File/Plan Reviews. The CDDO indicates that they complete tracking/trending of information and this information is presented to the COCM and to the Board. There was evidence of this occurring. The CDDO presented information indicated that they tracked the number of reviews being completed, total numbers of individuals being served, total numbers of consumers on the wait list, new providers in the affiliation process, significant trends noted	Recommendation: Consider tracking/trending CI reports to see if any trends are identified. Also, the trends the CDDO is globally identifying through the QA process, if significant and show ongoing prevalence, these would be good areas to possibly develop CSP workgroups around to systematically try to remediate issues instead of just working with each provider individually as the CDDO has been. Doing this will show evidence that the CDDO is potentially asking for CSP provider input into the overall operations system. Consider adding a checkbox to the CI form so that the provider can indicate whether they completed an AIR report, which will allow the CDDO to more closely monitor compliance in this area. Also, if the Director continues to be the only individual completing the QA reviews, the policy should be updated to reflect the current practice that the COCM is not really involved in this part of the QA monitoring process.

					<p>from site reviews, number of intakes completed, numbers qualifying/denied for services, number of deaths, and loss of EF funding. The CDDO also outlined internal processes for their Critical Incident reporting. The CDDO has a Critical Incident Form they utilize and they have completed outreach to their affiliates by email regarding the use of the AIR system. There was evidence in the Critical Incident reports reviewed that the CDDO was completing follow up on significant CI reports and they had maintained documentation to show their follow up efforts. CCDO also had the CI reports sent to the KDADS QMS staff as well. Overall level of tracking and oversight monitoring is a strength area for this CDDO.</p>	
10a	<p>CDDO maintains evidence that the same remediation and follow-up process is utilized for all CSPs for same services.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>KDADS asked the CDDO to pull a six-month sample of corrective action plans issued for the review. The CDDO had issued corrective actions off their QA monitoring tools and to address issues identified. The CDDO provided information that they had provided email follow-up on the completed reviews and that they had issued corrective actions plans when warranted. The CDDO also produced documentation of oversight of compliance of corrective action plans and follow up until issues are resolved. The CDDO also indicated that they</p>	<p>Consider scheduling a routine meeting/phone call with licensing staff to touch base on issues that may be going on with affiliate providers so that information can be shared.</p>

				periodically involve KDADS QMS licensing staff of concerns/issues they might find while completing their local QA processes, although there is no standard ongoing communication with the licensing staff.	
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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"/>	KDADS had requested a sample set of 7 individuals be pulled for review of this question probe. The CDDO did provide evidence of what they send to each consumer annually which included their annual newsletter and attachments. The CDDO did not have evidence of specific letters sent to the individuals; however, they kept labels of who the information had been sent to. Also, the rights information being sent to individuals does not appear to be the specific set of rights which are to be sent to those individuals living in ICF/MR facilities.	The Article indicates that the CDDO should be informing individuals of their “rights pursuant to the developmental disabilities reform act.” Also, the CDDO was not able to show evidence of individual letters being sent to those requiring this information. KDADS originally issued a finding in this area; however, KDADS has decided to withdraw the finding based on rebuttal information provided by the CDDO regarding the set of rights provided to individuals annually. KDADS would still expect that the CDDO provide evidence of individual letters that were sent out annually as proof of this outcome being met. Outcome is now changed to reflect compliance in this area, with rebuttal summary being added at the end of this document.
11a	Does CDDO have documentation of ICF/IID requests?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The CDDO has a “Gatekeeping” policy which was reviewed. The CDDO indicated that they had one request within	No concerns.

					this past year for admission to an ICF facility. This record was reviewed and it appears the CDDO is following the appropriate gatekeeping policies/procedures.	
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, a list was provided.	No concerns.
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"/>	The CDDO has a policy "Council of Community Members". There were 41 total individuals listed on the membership list. The majority of council members on the list did include a majority of individuals served/guardians/or family members. CDDO representation on the council was not listed. The CDDO had identified on the membership list when each individual's term started. They had tracked when each individual left the council, but had not identified a target date of when membership term limits would expire. It appears individuals are recruited annually so term expiration dates would be staggered. Minutes are kept of Council Meetings and meetings appear to be pretty well attended.	Please consider adding the target expiration date to the list for any active members on the council. Also, please add the CDDO representative's name to the membership list.

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"/>	The CDDO has a current policy “Dispute Resolution” to address the dispute process. The CDDO indicates in their policy that the policy is shared annually with all individuals receiving services through their newsletter and the policy is posted on the CDDO website. Also, they have this listed as a “right” on the individual rights which are disseminated.	No concerns.
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"/>	KDADS reviewed a sample set of 13 files in which adverse actions had been taken by the CDDO in the past year. All files had evidence that individuals/guardians had been notified of their appeal rights and were given dispute resolution information. There was also evidence in some cases that the individual’s MCO and TCM providers were also emailed when an adverse action had been taken.	No concerns.
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"/>	KDADS reviewed files in which a dispute resolution process occurred. There were some cases in which issues that did not formally arise to the level of dispute were also reviewed. The CDDO provided notes outlining the dispute resolution process	No concerns.

					and the steps taken to resolve the issues. There was evidence provided to indicate the CDDO is following their policies/procedures as outlined.	
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"/>	Since there have only been two recent formal disputes, the CDDO has not tracked or analyzed this small sample set. However, the CDDO does upload the Quarterly Complaint Tracking Form to KDADS to track complaints.	The CDDO needs to be prepared to track and analyze data on disputes if more are filed in the future.
CONSUMER/FAMILY INTERVIEW		Y	N	N/A	COMMENTS	
21 total respondents						
1) Did you understand the eligibility application process? If not, please explain	20	1	0		1) Already had two sons who transferred from Sedgwick County-already familiar. 2) They helped us a lot. A little confusing, but we got through it. 3) If I did have questions, they were helpful. 4) They helped me with the application process. 5) CDDO helped us with it. 6) The lady did not tell me that much! 7) Most of it was easy. 8) Some of it was easy, did have to ask a couple of questions. 9) Staff was very helpful.	
2) Do you believe the eligibility determination process is understandable and timely? If not, please explain.	20	1	0		1) No problems. 2) Very quick response. 3) No delay, very timely. 4) Absolutely. 5) Pretty timely. 6) Determined pretty quick. 7) Yes, sure did. Very timely. 8) Yes, it was done quickly.	
3) Do you believe the service referral process (including options counseling) was timely? If not, please explain.	18	0	3		1) Yes, gets TCM services. 2) Yes, but on waiting list currently. 3) We get services, whole process was very timely.	

				4) Went over all options available.
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.	18	1	2	<ul style="list-style-type: none"> 1) Absolutely. Rikki explained appeal rights. 2) Yes, was made aware. 3) Yes, we did appeal and are still in the process. 4) Yes, they went over it. 5) Yes. We did not think our kids would qualify. 6) Sure, that information was received with everything else we got. 7) Was probably included in the information they provided at assessment.
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?	15	0	6	<ul style="list-style-type: none"> 1) Gave handout with detailed information on choices. 2) Was in packet. 3) Rainbows. 4) We qualified for some things but chose not to access anything at this time. 5) She did a good job of informing us and emailed us throughout the process. 6) TCM choices only. 7) We got respite and TCM. 8) Did receive information on all providers, but not currently receiving services. 9) Provided with several options, not sure if all, because I don't know all the options, but there were several options provided and I assumed they were all that were available.
6) If currently receiving services, have you every changed service providers? If so, how did you receive information about all your service options?	4	10	7	<ul style="list-style-type: none"> 1) Have never changed providers. 2) Have not changed providers. 3) Just the TCM switched, not the agency itself. 4) No we haven't. 5) No, not yet. 6) Have not had to change. That's a blessing! 7) No, no changes have been made to providers.
7) If currently receiving services, do you know who to contact if you want to change service providers? If so, who?	13	1	7	<ul style="list-style-type: none"> 1) Rikki Bowker or the case manager. Not for sure. 2) Yes. Local Butler County CDDO. Rikki. 3) Told can always contact Rikki. 4) Call the CDDO office.

				<p>5) Moved out of state.</p> <p>6) Not receiving services, but would contact the CDDO.</p> <p>7) CDDO/TCM.</p> <p>8) CDDO.</p> <p>9) CDDO.</p>
8) Do you have any other information regarding your interactions with the CDDO that you would like for us to consider?	17	4	0	<p>1) Very easy. Very welcoming. Very accommodating to their schedule.</p> <p>2) Very accommodating to transfer of two sons from Sedgwick County. Very easy to work with. Office very accommodating with toys for son, while I got paperwork.</p> <p>3) Very helpful, very timely.</p> <p>4) They were very nice. No problems.</p> <p>5) They are very informative. Very patient. Very pleased with them.</p> <p>6) Thought they were helpful, compassionate. Seemed to care!</p> <p>7) No.</p> <p>8) I think they need to be more thorough and look at documentation better. Do more research.</p> <p>9) No.</p> <p>10) Never had any problems. They did a good service for us!</p> <p>11) Easier working with them than other organizations in other states. Rikki was very helpful and explained things well so we could easily understand it.</p> <p>12) They are pleasant/helpful.</p> <p>13) Has been a good experience so far.</p> <p>14) No issues.</p> <p>15) So far so good.</p> <p>16) Experience has been pleasant so far.</p>
COMMUNITY SERVICE PROVIDER INTERVIEW 10 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?	10	0	0	1) Visiting clients and family.
10) Does the CDDO maintain a process to solicit (ask you) for your input on CDDO policies/procedures, major local systems	10	0	0	1) Periodic meetings.

change and statewide initiatives for which they represent your area? If not, please explain.				
11) Does the CDDO share information about your CSP with persons seeking services?	9	1	0	1) Via Email. 2) Provider Choice Form.
12) Does the CDDOs literature demonstrate impartiality regarding the CSPs in your area?	10	0	0	1) No comments received.
13) Are you aware of communication in which the CDDO benefitted one CSP over another? If yes, please explain.	1	9	0	1) No comments received.
14) Does the CDDO manage an effective process for persons to access your services? If not, please explain.	9	1	0	1) The CDDO system for service access seems very inconsistent, especially with regards to crisis funding allocations.
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	5	0	1) I am not aware of this. 2) I am unaware of this practice. 3) Not sure this has happened. 4) We are not aware of this. 5) We are not aware of this process.
16) Does your CSPs grievance/dispute resolution process refer the person to the CDDO if the issue is unresolved? If not, please explain.	10	0	0	1) No comments received.
CDDO STAFF INTERVIEW Nicole Hall, Executive 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 refused to affiliate with a provider.
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"/>	Never cancelled but have terminated agreements because FMS provider was not renewed by the State.
19) Does the CDDO solicit input from all affiliates regarding policies/procedures,	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Did on policies/procedures. Meet with affiliates once a quarter; used to meet every other month but that became difficult. Talk about whatever current issues are; send a lot of

major local systems change and statewide initiatives for which they represent your area? If so, how?				emails out to them. Any information received by the state is forwarded on so they are kept up to date. Affiliate meetings is a lot of information sharing; affiliates talk about issues/trends, speak amongst Peers.
20) Does the CDDO maintain separation in CDDO/CSP functions? If so, how?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CDDO located in Augusta, CSP is in El Dorado. Separate budgets, bank accounts, CSP director and CDDO director report to same board equally. Pay Flint Hills administrative fee to provide financial and HR support to CDDO.
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"/>	Doesn't come up often because it is a different name; but if it does come up they do explain; but generally there is not confusion
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, have a few on hold on referrals, but that is capacity issues, not because of severity of disability. Our affiliates must serve everyone regardless of their disability.
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, looks at everything; may have some questions on 3 rd party responsibility, it is the MCO's job now so we don't really look at that.
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"/>	Provided at intake; in intake packet. Part of annual mailing that goes out with newsletter. It is on website. Dispute information is on eligibility and funding letters
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"/>	One of the things we feel strongly about is that we use local and state funds for case management. Every family in Butler county has that option, even if they are not eligible. Think TCM is very helpful to maneuver through the system; help them find resources, etc. Get a significant amount of money from the county that enables them to do stuff like that. Use a lot of local and state funds to give those on waiting list or those ineligible to provide them with a little help for them to get by. Offer respite services for 2000 dollars a year; have a lot of families that use that (32) last year. Offer payment for diapers, assist with cost of diapers for kids 3 and up (30) people used this, unless they have Medicaid because that pays for that. Personal needs; help people purchase adaptive equipment, food supplements, etc. Pay for Day/Res for tier 0's and some who are not a crisis, but really feel like if they could give a little bit of support could really improve

			<p>their life and they help provide for them. Have summer camps in Wichita, help pay for cost of staffing for kids to attend camps in Wichita; had 12 attend camp last summer.</p> <p>We have a really good relationship/s with provider network. Have a lot of options to provide, a lot of community based options.</p>	
26) In your opinion, what are some areas your CDDO could make improvements.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Would like to see another option for work and getting people employed in the community. People need to have more opportunity to work; getting people employed in the community, but there are not many options in Butler County and not too many employers want to hire someone with a disability. I am part of employment first workgroup, work with school district and employment workgroup to make that better. Need more supportive homecare. Doesn't seem like a big need, not a lot asking about that services. But when people don't have family/friends in the area, could use supportive homecare to provide that service. Would like to improve community council. Can't get parents interested in participating; have had a couple show up once to a meeting and then they don't come back. Working on getting people interested in going once a quarter and be involved with the process. Need active involvement to provide quality feedback. Would like families to get more involved in general; do not have a lot of strong advocates in Butler County, needs improvement. Strategic planning.</p>
27) What CDDO function do you find to be the most challenging?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Quality Assurance. Challenges with that, there are problems with some agencies that do not recognize that they are doing something wrong across the board. When CDDO asks them to fix something, CSPs do not always take that well. Provides a lot of CAP's for paperwork not matching up, discrepancies on PCSP, but probably need to do more corrective action plans. Doesn't feel that agencies see issues in a systematic way. Eligibility has become quite an issue in the past year. Should improve with updates on eligibility from the State. Do not have much backing from the State making things difficult.</p>
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"/>	<p>CDDO does not do any strategic planning. Flint Hills does but we are not involved. Probably should do it.</p>
29) How does your organization measure your success? Specifically, what sort of data	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Once a year, we provide all the data to the board and COCM. Look back annually how many intakes done, how many eligible/not, looking at what might have happened. How had people schedule intake meetings and then don't show up. See how many funding</p>

does your CDDO capture? How do you analyze the data?				requests they had. Match approvals with what the state does to ensure they are doing what the state is looking for. Look at how many people passed away, what were the circumstances. If we see any issues, why someone left the agency, look into that to see if there is something they could improve. Give board updates on provider requests and give updates to board where they are at in that process.
BASIS ASSESSOR INTERVIEW				COMMENTS
Y N N/A				
Rikki Bowker, Basis and Eligibility Assessor, Assistant Director				
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: typically, always schedule face-to-face, go over intake packet and all information required to determine eligibility. Do application together. Let them know what information is needed for intake; if they have everything and I can tell they could be eligible, they do the assessment then and there. Runs eligibility every Wednesday morning and usually does initial in 5 day time frame. If they do not have information at meeting, marks down what is missing and complete eligibility and then they come back in and do initial assessment. Annual: schedule 2 months in advance. Send out save the date, outlook contact to case manager or team members (CSP). TCM responsibility to accept invite in 48 hours letting them know that the time works and client will be there. Once accepted, will send out save the date to guardian/individual for invite to meeting; should have this a month prior to the meeting; leaves extra space for reschedule if needed.
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, it is stated on the save the date that consumer must be present. If they are having behavior or not feeling well, will go to the house. If they do not want to attend, she will lay eyes on them to make sure they are seen prior to completing 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"/>	Administrative secretary enters them in by Tuesday or Friday to meet entry date. Those completed at first of week are completed by Friday and those at end of week are entered by the following Tuesday.
4) What do you find to be the most challenging aspect of your position?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Assessment is not good tool to reflect overall needs of individual. Weighs heavily on scoring in areas that may not be significant or applicable to client. It is easily manipulated by CSP. Intake/eligibility can be difficult; individuals have a hard time understanding eligibility. On the eligibility tool, there can be some grey area on how things can be perceived by assessors; could be an opinionated tool as well.
5) In your opinion, what improvements can be made to the assessor process?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Really think they need to pick back up on routine training for assessors across the state. Some have historical knowledge and some new assessors may not be trained in the same aspect; perceive things differently and affect services individual receives. When

				another assessor does it in another area it can drastically change member services, or lose services all together, so this makes the port process difficult at times. Pick up on BASIS roundtables and guidance from the state for consistency.
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"/>	Eligibility: developed group with Interhab; quarterly calls to go over issues or questions pertaining to the eligibility process. The state is working towards starting back up eligibility calls. Email correspondence with multi CDDO group to get consensus amongst other professionals. BASIS: Interhab and multi-CDDO group, make sure they have consensus amongst others. Make sure people are consistent. Would like more direct training from the state, but work amongst CDDOs.

REBUTTAL

CDDO OF BUTLER COUNTY

DATE REBUTTAL RECEIVED: 9-28-2017

Nicole Hall, Executive Director, of the CDDO of Butler County submitted a rebuttal email for one issue that was marked as a “finding” on the CDDO of Butler County final peer review report. The rebuttal email was received by KDADS on September 28, 2017. Rebuttal was reviewed and the final Peer Review Report has been updated to reflect the outcome of the rebuttal.

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

KDADS had issued a finding on this issue due to the CDDO using Article 63 rights and not the rights originally approved by the Commission for Article 64/CDDO usage. Nicole Hall, CDDO Director, indicated that the Article 64 CDDO rights which had been approved by the Commission in the 1990’s was not posted on the KDADS website and therefore the directive to use Article 64 rights was not clear since the information was not posted.

KDADS is in the process of researching this issue further and will be posting an approved set of CDDO rights approved by the current KDADS Commission to the KDADS website once the information is finalized.

On November 20, 2017, KDADS has decided to withdraw the finding while further research is being conducted and a final directive is issued by KDADS. The CDDO Peer Review report has been amended to show compliance in this area. The other concern noted on this probe in regard to keeping individualized copies of letters showing this function has been completed annually will continue to stand as the CDDO should keep records of when letters are sent to individuals in this category .