



April 11, 2017

# CDDO Peer Review of CDDO of Southeast Kansas

## Review Team:

Linda Young, KDADS

Colin Rork, KDADS

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Developmental Services

# CDDO REVIEW REPORT SUMMARY OF FINDINGS

CDDO of Southeast Kansas  
April 11, 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. CDDO of Southeast Kansas CDDO Peer Review was held on April 11, 2017 at 9:00 a.m. Prior to April 11, the CDDO of Southeast Kansas was last reviewed August, 2011. Currently Amy DeMoss serves as Director of the CDDO of Southeast Kansas 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 review. The organization of review materials was very helpful and much appreciated.

## 2. IDENTIFIED STRENGTHS

1. **QA Monitoring Forms** – The CDDO has developed many useful forms and mechanisms to gather information to evaluate their affiliate’s performance and to evaluate their overall CDDO system of care. Reviews include Background Checks and Training Verification, Consumer Satisfaction Surveys, Quality Assurance On-Site Tools which include file reviews by CDDO and TCM staff, direct service staff interviews and on-site observations of interactions between staff and consumers.
2. **CDDO Website** – The CDDO has developed a good website which is independent from the affiliated CSP organization. The website was easy to navigate, very functional, displayed CDDO policies, it was exclusive to CDDO functions only, contained useful content for persons learning about services (referral processes, resources, service descriptions) and relevant information on service providers, how to affiliate, etc. Notices are posted on the website, as well as CDDO forms. The information is posted in an impartial manner. The CDDO PO Box, phone and fax number is listed at the bottom of each website page.
3. **Policy/Procedure Format** – The CDDO generally had well written and organized policies and procedures. The format the policies/procedures were organized in was easy to read and policies were generally detailed.

4. **CDDO Handbook** - This document is very informative and covers many topics, including, but not limited to provider choice, description of the CDDO, CDDO staff names and functions, Glossary of Terms, Description of Services, Dispute Process and Rights Information.

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

#### **1. Outcome Desk Review: Review of Policies and Procedures, Website and Newsletters – Monitoring Activity 1.**

Issue: Some policies and Procedures include outdated practices and language.

Recommendation: Policies identified in Section 1 of the Peer Review Tool include potential consideration of changes to the Code of Ethics policy, Service Termination Policy, Dispute Resolution Policy, Gatekeeping Policy, QA Policy, Changing Service Providers Policy, and CDDO Implementation Responsibilities Policy. KDADS would also like to see a State Aid Distribution Policy Developed and well as a CIR Policy/Procedure developed to describe the current system used for CIR reporting and to include the monitoring of the use of AIR reporting by affiliates. Please submit any new or substantial changes to policies to KDADS for formal review as outlined in the contract.

#### **2. Outcome 3: CDDO completes all management responsibilities as required -**

Issue: Affiliate List provided and services they were contracted to provide did not always match written documentation. The CDDO handbook also did not always accurately match what was listed in the affiliate agreements.

Recommendation: Review all materials to ensure that all affiliates are included on the affiliate list, even if the affiliates are not accepting referrals. Ensure that Schedule A attachments/handbook information are accurate for the services the affiliates are contracted to provide.

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

Issue: The form the CDDO uses to document the Basis/Functional Assessment information does not readily track the entry date that information was entered into KAMIS. The CDDO had to pull a special report to show this data.

Recommendation: Consider amending this form to include the entry date into KAMIS so all data is captured on one form.

#### **4. Outcome 3: CDDO completes all management responsibilities as required – Monitoring Activity 3d.**

Issue: Choice Forms were primarily being signed by Guardians only, and not the persons served, even when the persons served were capable of signing.

Recommendation: Consider having individuals who are capable sign these forms as a matter of practice.

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

Issue: CDDO indicated they solicit feedback from providers at affiliate meetings regarding input into the CDDO system, however, this specific item was not found in Affiliate meeting minute notes.

Recommendation: Consider adding a standing item on the Affiliate meeting agenda to capture this specific item or conduct a periodic satisfaction survey to gather this information.

**6. Outcome 10: CDDO will maintain a locally developed impartial QA process that reasonably addresses regulatory requirements.**

Issue: The CDDO has a local CIR system in place; however, the CDDO did not have a well-organized documentation to show what follow up the CDDO had completed on each CIR incident they had received.

Recommendation: Consider putting a system in place which readily identifies the follow up the CDDO has completed on each CIR incident.

#### **4. FINDINGS**

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

Issue: CDDO identified that individuals are not always present for Basis reassessments and courtesy screenings are not consistently requested.

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 3c.**

Issue: Appeal rights were not being sent to individuals who were denied for crisis funding.

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 3e.**

Issue: Transfer choice forms were being completed by phone with the guardian's name being signed by CDDO staff, with no follow up to gain the guardian signature. Some forms had wrong choice circled/marked on the forms.

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 CEO position description does not reflect a clear separation of duties. The CDDO does not have outdoor signage to show separation of function at their physical location. The CDDO website does not identify a physical location of the CDDO. CDDO and CSP share an open mailbox area for mail distribution.

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 10: CDDO will maintain a locally developed impartial QA process that reasonably address regulatory requirements.**

Issue: In policy, the CDDO has a well-developed QA plan; however, the committee and CDDO are not completing assigned monitoring activities as outlined in their policy which has caused the CDDO to be unable to track/trend this data effectively.

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. Consider Reinstating newsletters recommended for best practice. Newsletters are a good way for the CDDO to stay in touch with individuals (especially those who are waiting for services) and provide insight to what is available, or any changes/updates. Individuals may opt in to receive an electronic newsletter so they can stay informed.
2. The CDDO has no formal form to monitor the onboarding process for new affiliates. Please consider developing a form to monitor the collection of all items needed to track the onboarding of new affiliates.
3. Training requirements outlined for eligibility staff are generic and do not specifically outline what topics should be completed to be fully trained. Consider further defining what the actual courses that eligibility staff need to complete to be fully trained for this position.

**SUMMARY:** This review identified many CDDO strengths as well as opportunities for improvement. The CDDO of Southeast Kansas CDDO 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) Laurie Garrison, PICS, KDADS
- 4) Elizabeth Schmidt, Director, Harvey/Marion CDDO
- 5) Paula Drybread, Coordinator, Tri Valley CDDO
- 6) Debi Cramer, TCM Coordinator, Tri Valley Dev Services

Date of Review: April 11, 2017

CDDO Name: CDDO of Southeast Kansas

CDDO Address: PO Box 266, Columbus, KS 66725

Contact Person: Amy DeMoss, Director

Phone Number: 1-877-391-4066

Email: amy.demoss@cddosek.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"/>	Any reference to the CSP is not evident in any CDDO policies. Policy/Procedure format was easy to read, policies were generally detailed and were generally up to date. Code of Ethics policy and Educational Plan for the CDDO staff were considered strengths. Case Management Policy outlines helpful, clear requirements for case management providers and also outlines clear consequences for failure to perform required duties.	Code of Ethics Policy: Might include how the CDDO shares this with their provider network and how the onboarding process is completed. Service Termination Policy: Would recommend a description be added to clarify the number of notices/time frames for which lack of response is determined to be interpreted as voluntary withdrawing from services. Dispute Resolution Policy: Recommendation to include dispute/appeal language into the policy which direct individuals to the appropriate entity. Gatekeeping Policy: Needs to be updated to include current KDADS procedure and relevant language. QA policy: Recommendation to consider outlining what the CDDO staff does specifically in reference to on-site monitoring of their affiliates. Changing Service Providers: Recommendation to consider clarifying that a person can exercise his/her right to change providers without going through the official dispute resolution process first. CDDO Implementation Responsibilities: Policy indicates the CDDO relies on TCM to review rights annually; however do not

						<p>track this to ensure it is completed. From interview, it was learned that the CDDO does an annual right review, but this is not specified in policy language.</p> <p>It is noted on policies that revisions have been completed recently; however CDDO indicated the changes have not recently been sent to KDADS for formal review. KDADS is unclear if any substantial changes/revisions to policies have been made that might rise to the level which would warrant a KDADS review of policy.</p> <p>The CDDO needs to develop polices for State Aid distribution and Critical Incident Reporting systems which would include language to monitor the potential use of the AIR system by the affiliate network.</p>
2.	Does the CDDO have a newsletter? If yes, review one years' worth. Does the CDDO ensure written communication demonstrates impartiality of the CSPs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A	CDDO does not have a newsletter, but does periodically send out success stories to network providers per CDDO Director interview. Most communication is completed by email with affiliates. CDDO may want to consider sending a periodic newsletter.
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 a well-developed website. It is a standalone website which is not associated with the CSP. It was easy to navigate, very functional, the resource section was well liked, and CDDO policies are accessible to the public. The content was found to be useful for persons learning about CDDO	Recommendation to consider listing the physical building address of the CDDO as well on the website.



					services, including referral processes, resources, and notices. Information is posted in an impartial manner. The CDDO lists its PO Box, phone and fax number at the bottom of each page.	
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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
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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 has many policies which show recent reviewed or revision dates.	Several CDDO policies are showing recent reviewed or revision dates. The CDDO indicated that they have not sent policy changes in for KDADS review in several years. It is unclear if any substantial changes to policies have been recently made. If so, any substantial changes to policy need to be sent through KDADS processes outlined in the contract if the revisions meet this requirement.
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**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 review team with current affiliate agreements for all affiliates. Affiliate agreements had been signed within the past year.	Upon review of the provided affiliate list and in comparison to the actual agreements, it was discovered that not all affiliates were listed on the provider list given to KDADS. This caused the survey monkey CSP survey to not be distributed to all affiliate providers for response and input into this review. It was also discovered that not all services outlined in Section A of the affiliate agreement matched the services the affiliates were noted as providing on the affiliate list provided to KDADS. There were also some discrepancies noted in the handbook as well. It is recommended that the CDDO ensure the affiliate list and handbook are accurate even if some providers have limited person specific

						services.
3a.	If the CDDO has cancelled or suspended an affiliate agreement, was the action consistent with regulatory criteria? Criteria: 1) provider did not accept rate equal to that established by the Secretary 2) Provider has established pattern of not abiding by service area procedures 3) Entering into an agreement would seriously jeopardize the CDDO's ability to fulfill its responsibilities.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CDDO has not cancelled or suspended any affiliate agreements.	N/A
3b.	Did CDDO report BASIS information to KDADS in the agreed upon timeframe? (All functional assessments shall be entered into KAMIS within seven calendar days of completion of the assessment.) KDADS will sample completed assessments and dates to compare against KAMIS entries (5 days to initiate assessment from date of request, 30 days to complete assessment from date of request, 7 days to enter in to KAMIS).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	KDADS reviewed a random sample of 20 individuals who had BASIS/functional assessments in the last year. CDDO provided evidence showing that BASIS information was entered into KAMIS in the agreed upon timeframe for 19/20 individuals sampled. KDADS would like to recognize the efforts of the CDDO's Functional Basis Assessor who completes typically all annual functional assessments for over 800 plus clients yearly.	20 sample files were pulled. Only one had not been entered into KAMIS within the 7 calendar days. The current form the CDDO uses to track BASIS/functional assessments is not used to track the entry date into the KAMIS system. The CDDO had to pull a special report to show this data. CDDO may want to consider documenting the KAMIS entry date on this actual tracking form. Through the sample pull, it was also discovered that on some occasions the CDDO is completing BASIS/functional assessments without the individuals present. (out of area/hospitalization/at school). Courtesy screens are not always requested or completed).
3c.	Following a sample of crisis/exception requests, do CDDO processes/procedures meet state	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	KDADS requested a sample of seven crisis/exception requests. Evidence provided indicates CDDO is following	Two denied requests were reviewed and the sample pull of these indicated that the appropriate appeal rights were not being

	guidelines?				crisis and exception process as outlined by KDADS for those approved for crisis funding.	sent to the individual when the crisis request was denied. It appears emails were just being sent to the TCM providers to inform them of the decision. The CDDO Director indicated she had learned of this and has now drafted a letter to send out when denials are completed. KDADS would recommend that the KDADS information on this letter include contact information so that it is clear how to contact KDADS if the individual receiving it would chose to do so.
3d.	Following a sample of eligibility determinations, do CDDO processes/procedures meet state guidelines? For example, was each person provided with “comprehensive options counseling?” Is the functional assessment/or reassessment occurring within the stated timeframe?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CDDO provided lists of individuals who had eligibility determinations with Desk Review Material. A sample set of 6 files was reviewed for this indicator. Options counseling was provided in the eligible cases. Processes/Procedures meet state guidelines and evidence shows they are implemented. KDADS would like to acknowledge the efforts of the eligibility staff coordinator who has implemented a coordinated method to track those seeking eligibility within the CDDO catchment area.	During the sample pull, it is noted that the person served is not signing the choice forms, even if the person served is capable of doing so. Guardians are asked to sign. Recommendation to have the individuals sign these forms, along with the guardians whenever possible to show evidence that the individual is in agreement with the provider choice.
3e.	Following a sample of provider case transfers inside and outside the CDDO catchment area, does CDDO ensure processes/procedures meet state guidelines?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	KDADS sampled 8 provider case transfers inside and outside CDDO catchment area with desk review materials. Evidence demonstrates CDDO processes/procedures do not fully meet state guidelines. The CDDO has a Continuity and Portability of Services Policy/Procedure in place which outlines	During the review of the sample pull, it was discovered that transfer choice changes were primarily being completed by phone with the guardian name being signed by the CDDO staff member indicating the information had been taken by phone. A follow up email was then issued to the CSP organizations affected.

					their processes. The team did like that when email notification was sent out regarding changes in providers that it was noted in the emails that the current TCM will need to schedule a transition meeting to include all parties within two weeks.	In some instances the information in the memo sent out did not match the attached provider choice form with the wrong agency being circled as the choice.
3f.	Following a sample of affiliation agreements, does CDDO ensure agreements are uniform for like services? CDDO operated CSP must have an affiliation agreement with CDDO. Affiliation agreement cannot extend advantages not offered to other CSPs.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All affiliate agreements reviewed and are uniform for like services. There is no evidence any agreement extends advantages not offered to other CSPs.	N/A
3g.	Does evidence and documentation demonstrate that affiliated service providers have opportunity for input on CDDO area system management? Correspondence and interviews verify the CDDO makes input opportunities available for all affiliates.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Affiliates have representation on the COCM and Quality Assurance Committee. CDDO indicated that they also solicit feedback at affiliate meetings under the item of "Additional Agenda Items". They currently do not do any type of satisfaction surveys with their affiliate group to solicit feedback.	CDDO might consider a standing specific item on their affiliate meeting agenda to specifically ask this item. In reviewing affiliate minutes, the item "Additional Agenda Items" is not listing in the minutes as an item in which this question was asked, with no documentation noted for responses/or potential issues being brought up. (Minutes reviewed were from 5-3-16 and 3-14-17). CDDO may also want to consider an anonymous survey to gain feedback since some affiliate members may not be comfortable providing feedback in a group forum.
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"/>	The CDDO indicated they had two staff who split duties, President/CEO and Vice President for Administration and CDDO Operations. One job description clearly	The President/CEO position description needs to be updated to more clearly reflect and separate out the CDDO Essential Job Duties and the CSP Essential Job Duties.

					separates out CSP vs CDDO job duties; however, the other one does not. Also, the CDDO contracts by paying a monthly fee and has a memo of understanding with the CSP for HR, IT and Accounting services.	
3i.	CDDO will maintain a separation in function between the CDDO and CSP management and operations. It is clear which functions are CDDO and which are CSP. If there are personnel that work for both entities their position description reflect such. Paper and electronic information is stored securely to ensure CSP division of a CDDO does not have access.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Position description for the Vice President for Administration and CDDO Operations nicely outlines the separation of job duties for each entity. The CDDO has a separate business name from the CDDO. The CDDO has a stand-alone website. The CDDO office has a separate phone, fax numbers and email addresses. The CDDO has its' own logo with colors chosen to be in contrast to the CSP. The CDDO has its' own stationary and letterhead. They also have their own staff CDDO shirts and name tags. Three staff all have home offices. Although the CDDO office is located inside the Class building, the CDDO staff located in the office, answer all phones. The CDDO office is locked whenever the CDDO staff are not working in that office. The CSP does not have access to the CDDO unless the CDDO staff are there. The CDDO uses the BCI program for their electronic record storage. The CDDO has the ability to access who has control to what records. The CSP can only access the individuals they support. The CDDO staff are the only staff who can	The President/CEO position description does not reflect clear separation of duties and it should be updated. No outdoor signage is present for the CDDO, only CSP. Physical location of the CDDO is not advertised to the public. The CSP receptionist does pick up the mail for the CDDO and separates it into a mailbox area which is open to both CDDO and CSP staff members, which could cause the CSP staff the opportunity to view CDDO mail which is distributed openly.

					delete files from BCI. The CDDO also has a locked area in the hallway for manual storage of records. Outside the interior CDDO office door, is signage indicating that the CDDO is located there. CDDO holds affiliate meetings in a neutral location which they rent. Some COCM meetings are held in neutral locations.	
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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"/>	CDDO has a policy "Affiliation with the CDDO" which outlines the process for affiliation. Affiliate agreement/addendums provide all required certification, documentation and expectations for different services.	Schedule A attachments did not always match up accurately with the services indicated the CSP provider was providing on the provided affiliate list.
4a.	CDDO must maintain documentation that identifies the current status of all individuals/entities/applicants requesting affiliation, including notification of appeal/grievance rights. Evidence of a process for affiliation and its monitoring.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CDDO has a policy "Affiliation with the CDDO" which outlines the affiliation process. In addition, the CDDO outlines the "Required Documentation for Affiliation with the CDDO of Southeast Kansas". The website also outlines the affiliation process. All Affiliate Agreements reviewed included evidence of this process for affiliation. There have been no requests to affiliate within this past year, so KDADS was unable to see evidence or documentation of the affiliation on-boarding monitoring	The CDDO did indicate they have no formal form to monitor the onboarding process for new affiliates, so as they on-board new affiliates, this form may be something the CDDO may want to develop.

					process.	
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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 had the “Information on Community Services and Providers” policy in place to address this item. This policy provided bullet point evidence throughout the policy which showed compliance. These items included the following: Employment of CDDO Coordinators, Maintaining Information on Service Providers, Providing Information to Persons Initially Requesting Services, Providing Information to Persons Receiving Services, Potential Conflicts of Interest, Dispute Resolution, and Maintaining Information on Service Providers/Services. The choice form is very detailed and is separated by service type. Also includes signature indicating they received providers handbook, which includes rights/responsibilities and dispute resolution information. Provider handbook is a good practice. At all BASIS, consumers are provided with all affiliated organizations and choice form. Reviewed choice form, which included	Review indicated that at times the affiliate list does not always match the handbook or accurately reflect the services each affiliate if currently offering.



					all affiliates (Case Management, Day, Residential, FMS, PCS, Specialized Medical, Supported Employment, Enhanced Care Services, Wellness Monitoring, and overnight Respite options.).	
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**Outcome #6**  
**K.A.R. 30-64-22 - Access to HCBS & Day/Res State Aid funding is not dependent on the person's chosen service provider.**

#		1	2	7	Strengths & Comments	Findings & Recommendations
6.	CDDO policies and procedures for accessing state aid funds are made available on request. An impartial process for determining funding decisions is in place.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CDDO supplied Quarterly State Aid Tracking reports. State aid allocation reports indicate that the funds are only distributed consistently between two entities.	KDADS initially had concerns as the CDDO did not have a policy/procedure which indicated how state aid dollars would be determined to be distributed within the catchment area and what the criteria was for requesting these funds. It also appeared that there was not an impartial distribution process in place to allocate the funds under the current system and the current distributions seem to be "pre-determined". An initial finding was made, but after CDDO rebuttal was received on May 24, 2017, KDADS rescinded the finding on May 30, 2017. Affiliate feedback indicated that the distribution of local funding may not be done in an equitable manner.

**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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CDDO provided evidence that the training was approved by the COCM. Since KDADS no longer has eligibility	Training requirements for eligibility staff are generic and do not specifically outline what specific topics should be covered to

	approved by COCM. Evidence eligibility staff have completed identified requirements.				meetings, the CDDO staff participate in the multi-county CDDO coalition to address their staff's training needs. CDDO did provide training tracking log for eligibility staff, which did show attendance at the Multi-CDDO meetings this past year and that the staff also attended a two hour Interhab Eligibility Workgroup meeting in January, 2017. CDDO has a Single Point of Entry Policy and an Education Plan for CDDO staff outlining training requirements.	be trained as an eligibility staff member.
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"/>	<p>“Changing Service Providers” policy is in place and procedures appear that they are impartially implemented for the process that is utilized for persons wishing to change CSPs in that CDDO area. Policy provides process to be followed that ensures no interruption of services. Discusses the consumer right to choose providers. CDDO tracks provider changes and presents the data to the COCM. Annual provider choice form is supplied providing a place to check if they wish to change providers. Choice form includes affiliated providers. Choice form allows tracking indicating date change requested and effective date for new or changed service.</p>	<p>Policy does seem to elude that an individual “is expected to follow the service provider’s dispute resolution policy and attempt to remedy the situation before changing providers”. Upon clarification, the CDDO Director indicated that in practice an individual does not need to follow this. Policy should be updated to clarify this discrepancy.</p> <p>Feedback from CSP Survey indicates that there is a potential concern among the affiliate network that one CSP (Class) is being promoted more than other CSP organizations, especially for individuals being transferred out of Parsons State Hospital.</p> <p>As indicated previously, some choice forms were being taken by phone with CDDO staff signing a guardian name and indicating the information was being</p>

						taken by phone. Guardian signatures were only being obtained, even if the individual had the capability of signing the form.
<b>Outcome #8</b>						
<b>K.A.R. 30-64-23 - Informed Choice of Community Service Providers</b>						
#		1	2	7	Strengths & Comments	Findings & Recommendations
8.	CDDO effectively maintains documentation of service provider change/transition requests/notifications. Notifications are maintained.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>“Changing Service Providers Policy and Continuity and Portability of Services Policies” are both in place. Also, the “Service Termination Policy” is in place as well. Desk Review materials included list of all individuals who have changed providers in the last year. KDADS requested random sample of 8 consumers who have changed providers in the last year, CDDO provided at review. All consumers who were sampled had a choice form including all affiliates, indicating what service they’d like changed and is signed by guardian. Choice forms indicate date change was requested and effective date for new or changed service. CDDO provided change tracking for the past year. The CDDO tracks by consumer, provider change from, provider change to and date. CDDO provided provider per graph that indicates where changes occurred. CDDO maintains documentation of service provider change/transition requests/notifications and notifications are maintained.</p>	<p>Guardian is primarily signing change requests, or as indicated previously, the CDDO may take these by phone and sign the guardian name.</p> <p>On the Service Termination Policy, would recommend a description be added to clarify the number of notices/time frames for which lack of response is determined to be interpreted as voluntarily withdrawing from services.</p>

<b>Outcome #9</b>						
<b>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.</b>						
#		1	2	7	Strengths & Comments	Findings & Recommendations
9.	CDDO process is effective. All persons that request services, for whom funding is available, receive requested services. Review: affiliate agreement; policy/procedure; any agreements for provider specialization and capped capacity.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CDDO has "Uniform Access to Services" policy which states that all persons have equal access to services. The CDDO also has a CDDO Implementation Responsibilities" Policy. Affiliate agreement states that CSP must comply with all CDDO written procedures, by signing agreement, they indicate that they have reviewed policies and procedures outlining that all persons that request services, for whom funding is available, regardless of severity of disability, receive requested services. Consumers and affiliates are informed of the Consumer's Rights per the CDDO handbook and service affiliate providers are listed in the handbook as well as on the website. Capped capacity is identified internally. Overall, handbook concept might be considered a best practice.	There were some discrepancies between the handbook/affiliate lists as the CDDO was removing some providers when their capacity was capped or when providers had limited licenses. Recommendation to ensure that all listing of affiliates is consistent across all reporting mechanisms. CDDO Implementation Policy: Policy indicates the CDDO relies on TCM to review rights annually; however, the CDDO does not track this to ensure it is completed. From interview, it was learned that the CDDO does complete an annual rights review as well, but this is not specified in policy language. We recommend this statement be added to further clarify this point.
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"/>	CDDO has not had any persons the Secretary of KDADS has determined inappropriate for community services because the person presents a clear and	N/A

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

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

#		1	2	7	Strengths & Comments	Findings & Recommendations
10.	QA process addresses the required regulatory requirements including: Choice, Person-Centered, Rights & Responsibilities, Paid/Delivered, Third Party payment responsibility and ANE reporting information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	CDDO has a “Quality Assurance” Policy/Procedure which was included in Desk Review Material. The CDDO also has a QA process form which indicates how the QA Committee team and the CDDO Coordinators/Director review files. The CDDO has developed several forms they utilize for their QA reviews (some used by CDDO staff, some by Committee members, and some by TCM providers. These reviews are completed “on-site”. Items checked include file reviews, individual interviews, staff interviews, staff file reviews, guardian questionnaire and reviewer observations. The “CDDO Quality Assurance process seems very thorough when implemented. Results of all quality assurance procedures are typed and presented to QA committee. CDDO Quality Oversight Checklist forms are considered to be a best practice. Four months’ worth of critical incidents were reviewed as the sample set. The CDDO did provide evidence that they are tracking the type of critical incidents that happened and this is presented to the QA Committee.	The minutes indicate that the CDDO and the COCM is having difficulty getting their reviews completed. Minutes indicate that the review information has not been tracked, trended and presented to the committee due to “the committee continuing to work on getting the reviews completed” 27 reviews were completed last year, with only one review being completed so far in 2017. The CDDO Director acknowledges that this is an area in which the CDDO needs to improve. The CDDO did not have a system in place to show their follow up on critical incident reports they had received. They indicated they provided follow up, but could not readily show the follow up that had been provided. Recommendation to develop a way to document the follow up that is occurring. The CDDO did host an AIR training in conjunction with KDADS staff at an affiliate meeting. CDDO should continue to partner with the state to educate and require affiliates to report in AIR. No Critical incident Policy/Procedure was provided and policy should include requirement and

						instructions on reporting AIRS, as well as local CIR reports and should include CDDO follow up methods. The Quality Assurance Policy should also more clearly specify what tasks the CDDO staff does specifically in reference to on-site monitoring of their affiliates.
10a	CDDO maintains evidence that the same remediation and follow-up process is utilized for all CSPs for same services.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CDDO did initiate some corrective actions plans based on their internal QA review. Four of these documents were reviewed. CDDO indicated that the CSP's did fix issues identified on the reviews based upon their follow up. CSP also showed active evidence of their monitoring of the affiliate network by providing evidence of capping of affiliate capacity until identified issues were corrected. CDDOs Quality Assurance Procedures indicate the same remediation and follow-up process is utilized for all CSPs for same services. CDDO is active in working with KDADS licensing staff to monitor the affiliate network.	No concerns were identified, except that the QA committee did not complete the expected number of reviews identified to be completed throughout the review year.

**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"/>	CDDO has a "Gatekeeping Policy" and procedure provided outlines process which outlines the CDDO's current process. Policy states that CDDO will annually review individuals living in private ICF's in its catchment area. And they will inform the person/family/guardian of all services supports that are available in or near the person's home county. For those persons whose home county is in another CDDO area, the CDDO will provide the home county CDDO with the persons' information in order for that CDDO to fulfill its responsibilities in this regard. 19 sample files were reviewed and all requirements were met.	The Gatekeeping Policy needs to be updated to include current KDADS procedure and relevant language.
11a	Does CDDO have documentation of ICF/IID requests?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Files reviewed and were in compliance. There is "Gatekeeping Policy" in place indicating CDDO has policy/procedure in place meeting basic regulatory requirements for Gatekeeping process.	The Gatekeeping Policy needs to be updated to include current KDADS procedure and relevant language
<b>Outcome #12</b>						
<b>K.A.R 30-64-31 - CDDO maintains a council of community members that meets the regulatory requirements.</b>						

#		1	2	7	Strengths & Comments	Findings & Recommendations
12.	Did CDDO provide a list of the council of community members?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CDDO provided list of council of community members including, name, category, start date, end first term, date re-elected, end second term, and comments. There are 8 members, 4 consumer/guardian/family and 4 affiliates/CDDO staff.	N/A
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"/>	Strength: Chair and Co-Chair are individuals with disabilities. Term limits appears to have been met. CDDO representative is a non-voting member.	N/A

**Outcome #13**

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

#		1	2	7	Strengths & Comments	Findings & Recommendations
13.	CDDO has policies/procedures implemented as written and approved in accordance with Article 64 requirements, and clearly addresses how persons requesting/receiving services and family members receive information regarding the CDDO complaint/grievance process is accessed.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CDDO has "Dispute Resolution Policy" and Procedure that is in accordance with Article 64 requirements. CDDO provided Quarterly Complaint Tracking Form, however, there have been no formal disputes to record in the last year. Policy is also listed on the website.	Recommendation to include Dispute/Appeal language into the policy which direct individuals to the appropriate entity.
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"/>	CDDO maintains evidence that the dispute resolution process is made available and was provided. 10 sample files were reviewed. Documentation is completed on the Acknowledgement of Receipt of Individual Rights document and is signed.	N/A



					The CDDO also uses a handbook annually to explain process, with signature acknowledgement this was received.	
13b	CDDO must maintain evidence of all incidence in which the dispute resolution process was initiated by any party.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CDDO has not had anyone request the dispute resolution process for at over two years. CDDO Director explained that they capture complaints/concerns on monthly reports to stay proactive and have resolved issues before they develop into a dispute. There is also a CDDO Quarterly Complaint Tracking Form uploaded to KDADS through the utility upload that was provided and reviewed indicating that the CDDO is active in resolving/monitoring complaints when they occur.	N/A
13c	CDDO must evaluate the collected data in effort to utilize trends to improve the CDDO system.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There has been no dispute resolution data to trend. However, CDDO does upload Quarterly Complaint Tracking Form to KDADS to track complaints. CDDO also verbally described what sort of process the CDDO would to analyze this type of information. Other data is tracked and evaluated as part of the QA overall process and is routinely reviewed by the COCM QA Committee.	Be prepared to start trending any dispute resolution data received by the CDDO.

CONSUMER/FAMILY INTERVIEW	Y	N	N/A	COMMENTS
<b>9 total respondents</b>				
1) Did you understand the eligibility	7	1	1	1) No, the process is not easy to understand

application process? If not, please explain				2) N/A, I have not filled out all the paperwork yet 3) For the most part
2) Do you believe the eligibility determination process is understandable and timely? If not, please explain.	6	1	2	1) No, I moved out of state to get the help I needed. 2) Yes, it takes a long time to get the services you need. (on a waiting list), but the CDDO processed the application quickly 3) N/A, I have not filled out all the paperwork yet 4) N/A, I didn't really understand the process. I just answered the questions the best I could
3) Do you believe the service referral process (including options counseling) was timely? If not, please explain.	7	1	1	1) Yes we chose the TCM closest to us 2) No, I was told I qualified, but then put on a waiting list and never heard back from them.
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.	7	0	2	1) Not sure, can't remember.
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?	5	0	4	1) TCM only, on waiting list, trying to get crisis funding 2) Not receiving any services at this time, on the waiting list
6) If currently receiving services, have you ever changed service providers? If so, how did you receive information about all your service options?	1	4	4	1) Not receiving any services at this time, on the waiting list. 2) CDDO provides choice forms with all available options on it. 3) Not receiving services.
7) If currently receiving services, do you know who to contact if you want to change service providers? If so, who?	4	0	5	1) I am not receiving services and am concerned about the distance to get to the CDDO. There are limited providers.
8) Do you have any other information regarding your interactions with the CDDO that you would like for us to consider?	2	0	3	1) I can't think of anything 2) They are working with me. No concerns. 3) The lady that came out was very nice. She was very thorough. 4) Everything is fine 5) The lady that did testing, very nice, professional. The state needs to make progress

				in the amount of services provided.
<b>COMMUNITY SERVICE PROVIDER INTERVIEW</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>COMMENTS</b>
<b>8 total respondents</b>				
9) Does the CDDO have an effective process for completing the annual BASIS assessment? If no, please explain?	8	0	0	<ol style="list-style-type: none"> <li>1) There is only one BASIS coordinator for our area. This seems like a lot for one person considering the population in southeast Kansas. The information behavior support plan (behavior data) is required to be submitted to the coordinator's review at least one month prior to the birth month if it is to be included on the BASIS. This means that these documents are updated two months prior to the individual's birth month. If the TCM does not submit the behavior data within the BASIS coordinator's time frame, it is not included in the BASIS even if the data is brought to the actual BASIS meeting. This seems unfair, especially in circumstances when there is external case management which the CSP would have no control over.</li> <li>2) The assessor does an amazing job and knows the customers. The administration needs to stay off of her and just let her to her job the way people respond to.</li> </ol>
10) Does the CDDO maintain a process to solicit (ask you) for your input on CDDO policies/procedures, major local systems change and statewide initiatives for which they represent your area? If not, please explain.	7	1	0	<ol style="list-style-type: none"> <li>1) The CDDO has quarterly affiliate meetings, which include TCM's and affiliated provider administration. These are helpful to relay information and to get input.</li> <li>2) Information is communicated and sought at the Affiliate meetings and Community Council.</li> <li>3) They really use a more dictator philosophy (tell providers what we will do or else they won't affiliate)</li> <li>4) Emails</li> </ol>
11) Does the CDDO share information about your CSP with persons seeking services?	7	1	0	<ol style="list-style-type: none"> <li>1) Typically, if there is an individual looking for services in our area, they are encouraged to tour any agency with an opening</li> <li>2) I believe that tours are set up and left to the CSP to discuss with the person</li> <li>3) They have a provider list</li> <li>4) Brochure</li> </ol>
12) Does the CDDOs literature demonstrate impartiality regarding the CSPs in your area?	8	0	0	<ol style="list-style-type: none"> <li>1) Not sure, but I think so</li> <li>2) All we know about is a list of CSP's, nothing that describes them.</li> </ol>
13) Are you aware of communication in which the CDDO benefitted one CSP over another? If yes, please explain.	3	5	0	<ol style="list-style-type: none"> <li>1) The CDDO gets mill levy money from the counties in which services are provided in our area. Historically, that money has all been given to their own provider CLASS. I was informed by a member of the CDDO that their mill levy money for Crawford</li> </ol>

				<p>County is being distributed fairly among the CSP's however that will not be happening in Labette, Montgomery, Cherokee counties.</p> <p>2) One CSP benefits more in our area because the owner is an employee of PSHTC. It is obvious that this CSP gets a larger amount of referrals and it appears to not abide by the same rules.</p> <p>3) Not aware of any but I do believe it's a conflict of interest to be a CDDO and a Provider.</p> <p>4) People coming out of the state hospital seem to be going to one provider. Someone should check the percentage of placement to any one provider.</p> <p>5) Unknown.</p>
14) Does the CDDO manage an effective process for persons to access your services? If not, please explain.	8	0	0	1) The gatekeeping services in our area are outstanding. We have always felt that they really help individuals seek out and access services in a timely manner.
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?	4	4	0	<p>1) We usually are informed via email if there is someone from out of our area looking for services. I have never requested a list of persons interested from the CDDO but I assume if they had one they would give it to us.</p> <p>2) We have never seen one</p> <p>3) Not sure</p> <p>4) Of yes, I was unaware of this.</p>
16) Does your CSPs grievance/dispute resolution process refer the person to the CDDO if the issue is unresolved? If not, please explain.	8	0	0	
<b>CDDO STAFF INTERVIEW</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>COMMENTS</b>
<b>AMY DEMOSS, DIRECTOR</b>				
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"/>	Have not refused anyone for at least 8-9 years. Have only placed CDDO capacity restrictions on an agency. This would be time limited to ensure the CSP gets back on track.
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"/>	Last time was in the year 2008.

19) Does the CDDO solicit input from all affiliates regarding policies/procedures, major local systems change and statewide initiatives for which they represent your area? If so, how?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes, we have affiliate meetings. Cliff sends out stories about what is going on within the agency. Cliff looks at policies annually; however, I am unsure if he solicits any feedback on them.
20) Does the CDDO maintain separation in CDDO/CSP functions? If so, how?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes, Lori, Therese and Amy all have home offices. We have a separate CDDO office in the building. We have locked doors so Class staff cannot get into our things. We have a separate website, stationary, phone/fax. We do not have meetings at the CDDO office. For those that are in or want services, we go to them. We rent out a building for our affiliate meetings and do not use Class resources.
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"/>	I tell them up front that the CDDO is a division of Class, that we go by the CDDO of Southeast KS. We have a separate legal name.
22) Do all CSPs in your area serve anyone requesting services, regardless of severity of disability? If not, please explain	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	That is the expectation. The main reason it would not occur is due to capacity.
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, we track ANE, choices. We receive monthly reports from our case managers. The overall QA process/committee is something we could generally improve.
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"/>	In the provider handbook, provided annually. Rights/responsibilities are also included in the handbook given to consumers and providers.
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"/>	We do some things in the community, trainings with the school districts, Green Bush, etc. We try to travel to the individuals and families instead of making them come to us. We participate in the Multi-County CDDO meeting
26) In your opinion, what are some areas your CDDO could make improvements.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Quality Assurance and the Community Council is our biggest struggle. (timeliness, increase numbers of interviews and interviewers). Getting affiliates to meetings is also a challenge.

27) What CDDO function do you find to be the most challenging?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	QA Oversight of affiliates can be very time consuming.
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"/>	We have a retreat once a year with our group, we come together and work on planning/improvements. We hope to keep complaints down and ensure our consumers continue to receive services.
29) How does your organization measure your success? Specifically, what sort of data does your CDDO capture? How do you analyze the data?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Level of complaints. Trying to ensure timelines are met. Critical incident follow ups and numbers of these types of reports. We keep a spreadsheet and charts for COCM and Affiliate meetings.
<b>BASIS ASSESSOR INTERVIEW</b>				
<b>Y      N      N/A</b>				
<b>LORI HINMAN, CDDO COORDINATOR-ELIGIBILITY AND THERESE MITCHELL, CDDO COORDINATOR- ASSESSOR</b>				
1) Please walk us through the assessment process for an initial assessment and a reassessment. What does the timeline look like from start to completion?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	For eligibility, I get the call, explain services, how they work, explain waitlist, provide necessary/required documentation, once I get the consent/documents, mail to provider, if approved, I send a letter to schedule the functional assessment and offer choices. For annual basis, I had been trying to do these two months ahead. The new 365 rule is going to be difficult to work in immediately. I am now working on June basis. Debi gives me a list of who is coming due. I get ahold of the case managers to schedule. I require the TCM's to have the behavior data, PCSP, etc., uploaded to BCI prior to the basis date. For the number I do each month, it takes me about a week to review all the data I receive. I try to have affiliates submit the desk items to me at least one month prior to the review. The length that it takes to complete each assessment varies.
2) Is the consumer always present for their BASIS assessment? If not, please explain why.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The individuals are usually there, but not always. If the person, is in the hospital, Larned or at Parsons, they may not be present. If a child in at school, we may ask the case managers to have the teachers do part of the assessment (cutting with scissors, etc.) and we ask the teachers some of the questions. Sometimes we ask for a courtesy screening when they are out of the area, but not always.
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"/>	We have seven days to get them to Debi to enter, but we try to get things to her within 3-4 days. If we are going to be out of the office or gone, we are expected to coordinate with Debi to ensure the documents are entered timely.
4) What do you find to be the most challenging aspect of your position?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Gray medical records, it is uncertain sometimes how to score items in some areas of the tool. Not always sure if you are making the correct decision or not. People going into crisis and having to wait several days for a decision to be made and the individual is

				truly suffering and in need of crisis assistance immediately. The 365 rule. The KAMIS system cannot be relied on for tracking, it is often inaccurate. I wish we were still able to do the birth month as our trigger for functional assessments.
5) In your opinion, what improvements can be made to the assessor process?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Get rid of the 365 rule. Tool is very black and white and needs improvements. Our individuals needs don't always fit into the black and white categories. Would like to see 7 working days to submit things into the KAMIS system.
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"/>	Annual online KDADS training. Multi-County meetings. Affiliate meetings, Interhab trainings, Behavior trainings whenever they come available. The CDDO is supportive of sending us to any trainings we have an interest in.

**REBUTTAL**

**CDDO of SOUTHEAST KANSAS**

**DATE REBUTTAL RECEIVED: 5-24-2017**

President/CEO submitted a rebuttal letter with one issue that was marked as a "finding" on the CDDO of Southeast Kansas' final peer review report. This rebuttal letter was received by KDADS on May 24, 2017. Rebuttal was reviewed and the final Peer Review Report has been updated to reflect the outcome of the rebuttal, which was supported.

**Outcome 6: CDDO policies and procedures for accessing state aid funds are made available on request. An impartial process for determining funding decision is in place.**

KDADS had originally issued a finding on this outcome and had asked in a performance improvement plan for the CDDO to develop a policy/procedure for distribution which would clarify how the funds would be distributed impartially and how community service affiliates would be notified how they can access these funds.

CDDO provided a rebuttal letter asking for KDADS to provide citation to any state statute or regulation or CDDO contractual provision which addresses a requirement for funds to be distributed in an impartial manner.

After further review, KDADS provided a response to the CDDO by letter on May 30, 2017, indicating that the finding would be rescinded at this time.

KDADS Final Peer Review Report has been updated to reflect this action.