



January 10, 2017

CDDO Peer Review of

Cottonwood CDDO

Review Team:

Melissa McDaniel, KDADS

Colin Rork, KDADS

Laurie Garrison, KDADS

Linda Young, KDADS

Cathy Montgomery, Achievement Services

Quinta Avance, Avance-d Community

Alternatives CSP

CDDO REVIEW REPORT SUMMARY OF FINDINGS

Cottonwood CDDO Peer Review
January 10, 2017

1. GENERAL COMMENTS

The review team thanks the CDDO staff for all of their hard work, preparation and coordination to make the review as effective and efficient as possible. Cottonwood CDDO Peer Review was held on January 10, 2017 at 9:00 a.m. Prior to January 10th, Cottonwood was last reviewed October 2010. Currently Angela Drake serves as Director of Cottonwood CDDO and was the primary point of contact for KDADS throughout the review process. Desk review materials were submitted more than a month in advance and provided detailed descriptions on where documentation could be located and how it would be separated by outcome to allow the review team easy access to information.

2. IDENTIFIED STRENGTHS

1. **Affiliates and Collaboration** – CSP Survey results from KDADS and Satisfaction Surveys conducted by the CDDO and provided to the review team were positive overall for all of the asked questions. Affiliates have expressed they receive email updates regarding changes and polices are presented both at the council of community members and affiliate meetings to ensure all are updated and informed of current processes. CDDO does a good job through their affiliate meetings and surveying to ensure CSPs are able to provide feedback to the CDDO in order to improve area wide systems management, networking and educational opportunities.
2. **Website** – Cottonwood CDDO website at www.cddo.cwood.org is a very helpful resource for not only those interested in learning more about Cottonwood CDDO, but also for anyone looking to learn more about CDDOs and their processes in general. There are several different language options to choose from, so even those that do not communicate in English have easy access to the pages information. The website is very easy to navigate and provides resources that go above and beyond just essential information. The online BASIS calendar makes it easy for people to find a time that works for all involved to ensure a timely and effective process for completing BASIS assessments. Application Materials for Eligibility Determination are located on the website, offered in Spanish, and is very helpful so it is not necessary to reach out to a CDDO representative to provide that information. The Service Options tab provides all service options, separated by service type and includes a description/definition for all the difference services. This page also includes a “Guide to

Choosing Service Providers” that give consumers an idea of what types of questions they should ask when choosing service providers from each different service type. For any CDDO working on creating, or updating their company website, Cottonwood CDDOs would be a great place to start.

3. **Funding Requests** – Cottonwood CDDO performs both paper and in person visits with consumer, case manager, guardian, and/or family present when evaluating funding requests. Also, their funding request checklist is something that exceeds minimum requirements and is considered to be a great strength and best practice for others to follow. These additional steps are not necessary, but go above and beyond to ensure proper funding is issued, which is beneficial to all involved.

3. RECOMMENDATIONS FOR CDDO

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

Issue: The CDDO indicated the service provider may change their mind or make a mistake on the form they are filling out to indicate which services they offer which creates what appears to be a discrepancy between the affiliate list and what’s listed on the agreements themselves.

Recommendation: Affiliate agreement and affiliate lists need to be reconciled to verify services being provided. CDDO could make some sort of a note on the affiliate agreement if it does not accurately reflect services being offered/provided.

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

Issue: Out of 27 files reviewed, 5 annual reviews were not entered into KAMIS timely.

Recommendation: KDADS is in process of finalizing BASIS & Waitlist Policy. Once finalized, any review that was not entered into KAMIS timely will be considered a “finding”. Recommend working on ensuring these are entered timely for next review and provide detailed comments for any that may exceed the agreed upon timeframe.

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

Issue: Following a sampling of eligibility determinations, comprehensive options counseling forms were present in each file.

Recommendation: Would recommend a language change for the form “Certification of Receipt for CDDO Booklet” form. Language could be more clear to indicate service options were reviewed by the CDDO with the individual/guardian. Currently, the form only indicates the individual received the booklet.

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

Issue: Position descriptions do not make clear which functions are CDDO and which are CSP.

Recommendation: Make clear on descriptions the separation of CDDO job duties. Provide clarification of global statements such as “awareness and understanding of the dual role of Cottonwood as it applies to CDDO functions”. On CDDO specific position descriptions it indicates Cottonwood, Inc. on it, recommend removing/replacing with Cottonwood CDDO.

5. Outcome 7: CDDO will serve as single point of entry and maintain an effective application, eligibility determination and service choice – Monitoring Activity 7

Issue: There is no policy, procedure or protocol to spell out eligibility training process.

Recommendation: Review team recommends Interhab Eligibility information should be in protocol or policy/procedure. The eligibility training process could be spelled out for reference and provided to those interested in training. Overall, the goal is accomplished, training tracking utilized and outcome is met, it would be considered best practice to have requirements spelled out.

4. RECOMMENDATIONS FOR KDADS:

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

Issue: Following a sampling of functional assessments, 5 files were past 7 days of entry with no explanation.

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

5. FINDINGS

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

Issue: The CDDO shares a number of different resources with the CSP including a phone line, fax, signage, and various different position descriptions. Also, “...a division of Cottonwood, Inc.” is displayed as a website header and on various forms used by the CDDO. Policies and Procedures indicate they are part of a CDDO Section. This gives reviewers the impression Policies and Procedures may not be totally independent the CSP. Since the company names for the CSP and CDDO are so similar (Cottonwood Incorporated and Cottonwood CDDO), separation in function is crucial so people are easily able to recognize and make a distinction between the two.

Recommendation: Continue to work on further separation of the CSP from the CDDO. Ensure staff who have both CDDO and CSP responsibilities understand the line and their position descriptions clearly outline the work they do for the CDDO

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

6. BEST PRACTICE RECOMMENDATIONS:

1. CDDO may consider the development of a newsletter. This is a good way for the CDDO to stay in touch with people (especially those who are waiting for services) and provide insight in to what is available, or any changes/updates. Individuals or family members may opt in to receive an electronic newsletter so they can stay informed.
2. While reviewing CDDO website the review team noticed 6 broken links (provided below). There were also two forms on the website that need updated (Extraordinary Funding Policy and Referral & PreScreen documentation are not the most recent versions. Overall, the website is very well organized, provides more than essential information and is very helpful for all interested in CDDOs and their processes.

Broken Links include:

1. "BASIS Schedule"-Notice of BASIS Change Form
 2. "BASIS Schedule"-CDDO Transition Checklist
 3. "BASIS Schedule"-BASIS Questionnaire PDF
 4. "Affiliation Process"-Attachments 1, 2, 3 are broken links
 5. "Affiliation Process"-BCI Affiliate Access Application
 6. "CDDO Policies"-Functional Assessment Protocol
3. Single Point of Application and Referral Policy – If a person is deemed not eligible, they should have an opportunity for a 3rd party review (similar to a dispute). This should be referenced in the policy.

SUMMARY: Overall, the review was a positive one which identified many CDDO strengths as well as a few opportunities for improvement. Cottonwood CDDO is very friendly and accommodating, providing a wealth of knowledge and experience that is beneficial to all involved with the process. CDDO staff was well prepared, organized and ready to assist the review team to ensure an accurate and timely review.

Peer Review Tool

Review Team Members:

- 1) Melissa McDaniel, Program Integrity Manager, KDADS
- 2) Colin Rork, PICS, KDADS
- 3) Linda Young, PICS, KDADS
- 4) Laura Garrison, PICS, KDADS
- 5) Cathy Montgomery, Director Achievement Services
- 6) Quinta Avance, Avance-d Community Alternatives CSP

Date of Review: January 10, 2017

CDDO Name: Cottonwood CDDO

Address: 2801 W. 31st St. Lawrence, KS 66047

Contact Person: Angela Drake, Director

Phone Number: 785-842-0550 ext. 1614

Email: adrake@cwwood.org

Scoring Compliance Key

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

ACRONYM REFERENCE GUIDE

“ANE” Abuse, Neglect, Exploitation

“BASIS” Basic Assessment and Services Information System

“CDDO” Community Developmental Disability Organization

“COCM” Council of Community Members

“CSP” Community Service Provider

“ICF” Intermediate Care Facility

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

“KDADS” Kansas Department for Aging and Disability Services

“PD” Position Description

“QA” Quality Assurance

Program Contact:

KDADS Program Integrity

Community Services and Program Commission

503 S. Kansas Ave.

Topeka, KS 66606-3906

(785) 296-4740

Colin.Rork@ks.gov

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"/>	There was no mention of any CSP in the CDDO policies. All policies were specific to the CDDO.	The header on all provided policies reads “Cottonwood, Incorporated” which seems misleading. Cottonwood Inc. and Cottonwood CDDO should have a policy manual separate one another if they don’t already.
2.	Does the CDDO have a newsletter? If yes, review one years’ worth. Does the CDDO ensure written communication demonstrates impartiality of the CSPs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CDDO does not distribute either an electronic or hard copy newsletter. Angela mentioned this is something the CDDO is considering.	This would be another way to reach out to individuals and a nice way to stay in contact with individuals who are on the waiting list. They could opt in to receive an electronic newsletter if they’d like to. You can archive these on your website.
3.	Does the CDDO have a company website? If so, does website ensure impartiality of CSPs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Website content does ensure impartiality of CSPs. There is nothing to indicate any sort of favoritism of one CSP over another. Cottonwood Inc. has a separate website from Cottonwood CDDO. All CSPs are listed in “Service Options” and separated by the different service types.	On website, under header “Cottonwood CDDO” it states “...a division of Cottonwood, Inc. To ensure separation it would be recommended to have this removed. Also, “Cottonwood, Incorporated” is listed as header for all Policies and Procedures, Cottonwood CDDO should be listed. Section and Policy Number indicate it is for CDDO, however having Cottonwood, Incorporated listed on CDDO Policies and Procedures is misleading. There are several links that are currently not operational.

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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Angela indicated there have been no major changes in policy.	Any substantial changes to policy need to be sent through process outlined in the contract. Upon completion, distribute the policy via the IDD upload utility tool. IDD Program Manager and Commissioner will review and approve policy changes.

Outcome #3

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

#		1	2	7	Strengths & Comments	Findings & Recommendations
3.	CDDO maintains affiliate agreements with all affiliates. Does CDDO have current affiliate agreement for each affiliate?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All affiliates provided the same Affiliate Agreement. All Cottonwood affiliates had signed agreements. KDADS provided and reviewed sample of 12 affiliate agreements CDDO made available. For remaining 32, review team was able to locate and confirm on BCI, all had signed agreements with current affiliates.	Affiliate agreements and services provided at times do not match up. Mosaic listed as day provider, however, day is not marked on affiliate agreement as something they provide. Integrity home care also did not match up with what was on agreement and what was on the affiliate list.
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	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	27 total files were reviewed. There were 26 annual reviews sampled, of which 5 were not entered into KAMIS w/in 7 calendar days of completion of assessment. One initial review was sampled and it was completed in agreed upon timeframe.	Ensure BASIS information is being entered in to KAMIS w/in the agreed upon timeframes. KDADS will provide more clarification.

	request, 30 days to complete assessment from date of request, 7 days to enter in to KAMIS).					
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"/>	One denial was reviewed. NOA and appeals process present and processes/procedures met state guidelines. Provided list of all approved/denied, all reviewed met state guidelines.	No policy/procedure found on crisis process.
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"/>	All assessments/reassessments reviewed occurred within the stated timeframe. Following all reviews, consumers/guardians are provided booklet describing process and single point of entry and initial upon receipt of booklet.	There is no policy/procedure for eligibility. There is single point of entry policy, but does not discuss the eligibility process. However, website provides detailed description of eligibility process and website information provided with booklet. Would recommend language change “by signing below, I certify that I have been offered a copy of the Cottonwood CDDO Choice Booklet for the individual indicated above”. Language could be clearer to indicate that service options were reviewed by CDDO and comprehensive options counseling was offered/provided.
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"/>	KDADS provided Cottonwood with a random sample of 10 individuals who had case transfers inside and outside CDDO catchment area. Sample indicated CDDO ensures processes/procedures state guidelines.	
3f.	Following a sample of affiliation agreements, does CDDO ensure agreements are uniform for like	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Cottonwood CDDO has an agreement with Cottonwood Inc. and it is the exact same as all the other affiliate agreements	

	services? CDDO operated CSP must have an affiliation agreement with CDDO. Affiliation agreement cannot extend advantages not offered to other CSPs.				(uniform). Review team reviewed all affiliation agreements to ensure uniformity, which was confirmed.	
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"/>	CDDO provided affiliate meeting minutes from April 2012 with Survey Monkey results for capacity. Also provided 2016 affiliate meeting minutes as well as COCM minutes. COCM reviews policies annually. CDDO performs periodic surveys to their CSP's to gather feedback on their operations. Evidence/Documentation demonstrates affiliated service providers have opportunity for input on CDDO area system management. 14 CSPs responded to KDADS survey monkey, 13 stated expressed that CDDO does maintain a process to solicit for input on CDDO policies/procedures, major local systems change and statewide initiatives for which they represent in their area. Affiliates receive email updates and updates at regular CDDO meetings. Policies are presented both at COCM and affiliate meetings.	
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"/>	There are 11 individuals who work for both CDDO and CSP. CDDO provided position descriptions for all 11 individuals.	
3i.	CDDO will maintain a separation in function between the CDDO and CSP	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	There are personnel who work for both entities. Please refer to "Findings"	Review team recommends separation of CDDO job duties and clarification of

<p>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>				<p>portion of this report for a more detailed description of the separation in function piece.</p>	<p>global statements to make clear which function are CDDO and which are CSP.</p>
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Outcome #4

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

#		1	2	7	Strengths & Comments	Findings & Recommendations
4.	<p>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.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>CDDO has a policies and procedures approved in accordance with Article 64 requirements which can be found in Affiliate Referral Protocol and Affiliate Information Protocol. Copy of affiliate agreement indicates all affiliation requirements. There is also step-by-step guide provided to all interested in affiliation, broke down by service type, documentation required, submission timeline. CDDO websites provides “Affiliation Process” for interested affiliates.</p>	<p>Currently, links on website for “Affiliation Process” are not operational. Though written policies/procedures are in place and CDDO meets all requirements providing evidence of policy/procedures being followed, it is recommended that the CDDO address the website issues that pertain to the affiliation process.</p>
4a.	<p>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.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Cottonwood CDDO provided documentation which indicates guidelines are met. “Request for Affiliation Tracking” provided which indicates Provider Name and Date Requested Affiliation, Date Affiliation Packet sent to Provider (90 Day Deadline Begins), 30 Day Progress/follow-up on Affiliation Request, 60 Day</p>	<p>.</p>

					Progress/follow-up on Affiliation Request, and 90 Day Deadline Affiliation Complete or File Closed. Page 14 of Affiliation Agreement provides appeal/grievance rights. CDDO provides attachment with affiliation agreement that outlines documentation requirements for affiliation, which is very helpful outlining documentation required and submission timelines for all the different service types that may be requested. Results from CSPs surveyed by CDDO in 2013 and KDADs results from survey monkey for this review indicate overall positive response to CDDO processes in regards to affiliation. Survey also indicates that appeal/grievance rights are made clear.	
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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"/>	Booklet titled “Things to Know About Your CDDO; Your Single Point of Entry for Douglas & Jefferson Counties” is provided at every assessment/reassessment. If no assessment, booklet is provided annually to consumers and anyone requesting information. All CSP options are shared in booklet, as well as website. “Guide to Choosing Service Providers” on website provides great information and pointers on how to help gauge which provider will work best for them with questions to ask	.

					when choosing service providers	
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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 Funding Committee Protocol outlines crisis funding. There is also State Aid Allocation Protocol (Service Reduction Policy) and Service Access List Protocol. State Aid Funded List indicated tracking and provided detailed tracking for funds creating an impartial process for determining funding decisions in place.	

Outcome #7
K.A.R. 30-64-23 - CDDO will serve as single point of entry and maintain an effective application, eligibility determination & service choice process.

#		1	2	7	Strengths & Comments	Findings & Recommendations
7.	Eligibility staff have been trained per regulation. CDDO has developed a training program and such have been approved by COCM. Evidence eligibility staff have completed identified requirements.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Reviewed CDDO Liaison Policy, training records and training certificates. Meeting minutes provided to show CDDO developed a training program approved by COCM (Departmental meeting notes provided, as well as regional eligibility meeting minutes). Meeting minutes indicate ongoing training. Evidence/Documentation was provided showing eligibility staff have completed identified requirements. CDDO Liaison Training checklist lists all training topics that must be completed within 90 days of employment. Upon completing training, individuals receive certificate from The	Review team recommends Interhab Eligibility information should be in protocol or policy/procedure. The eligibility training process should be spelled out. Overall, the goal is accomplished and training tracking utilized, it would just be considered best practice to have requirements spelled out.

					Department of Social and Rehabilitation Services Commission of Mental health and Developmental Disabilities indicating successful completion of training to perform Developmental Disabilities Eligibility Determinations. Performance Evaluation/In Service Training report provided.	
7a.	CDDO policies and procedures are impartially implemented as written for the process that is utilized for persons wishing to change CSPs in that CDDO area. Policies and procedures are implemented as written.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CDDO has policy/procedure and protocol to ensure potential persons eligible for and requesting initials services are informed of CSPs in that CDDO area. Provider Change Protocol, Single Point of Application and Referral, and Affiliate Referral and Information Protocol. CDDO provided 4 examples outlining the process from beginning to end. Examples shows initial email, which CDDO directs to send to CDDO Director Angela Drake, to provider choice form and provider change form.	
Outcome #8						
K.A.R. 30-64-23 - Informed Choice of Community Service Providers						
#		1	2	7	Strengths & Comments	Findings & Recommendations
8.	CDDO effectively maintains documentation of service provider change/transition requests/notifications. Notifications are maintained.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CDDO supplied documentation with desk review material labeled "Service Provider Choice Tracking 2016". Documentation includes date parties notified, consumer name, signature received, provider name, authorized by, end date, new provider, and start date. KDADS provided 9 consumers	

					to sample from Choice Tracking list. Evidence provided for consumers on this list indicates notifications maintained (provided emails and choice forms). Providers and MCO notified by email (provided) of initial provider choice and transfers with the signed choice forms attached. Signed choice forms are filed in consumer's electronic file and uploaded to consumer documents in BCI.	
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Outcome #9

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

#		1	2	7	Strengths & Comments	Findings & Recommendations
9.	CDDO process is effective. All persons that request services, for whom funding is available, receive requested services. Review: affiliate agreement; policy/procedure; any agreements for provider specialization and capped capacity.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CDDO has Uniform Access to Services and Single Point of Application policies and procedures to ensure requested services are received. Item #14 on Affiliate Agreement "Discrimination in Delivery of Services Prohibited". CDDO showed process of how to access funding, providing list for tracking indicating whether approved or denied at either CDDO level or KDADS level. Sample of notice of actions provided for approved and denied requests. Affiliate provider list online indicates whether at capped capacity or not. Affiliate agreement outlines that CSP must alert CDDO of capped capacity for any service under agreement and will provide in writing	

					when they have availability.	
9a.	CDDO identifies number of persons the Secretary of KDADS has determined inappropriate for community services because the person presents a clear and present danger to self of community	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Cottonwood CDDO has not had any persons the Secretary of KDADS has determined inappropriate for community services because the person presents a clear and present danger to self and community.	

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"/>	Reviewed meeting minutes for the year to ensure quality oversight visits are occurring and any issues are being addressed/resolved. Reviewed the "CDDO QOC Consumer on-site visit checklist" Questions pertain to service delivery, Person Centered Support Planning, Rights & Responsibilities, Medications etc. CDDO Director indicates that upon AIR training, they will begin exclusively utilizing the AIR system for reports and have reporters print off and scan in AIR reports to CDDO system.	Continue to partner with the state to educate and require affiliates to report in AIR.
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"/>	Reviewed CDDO Affiliate quarterly oversight review and reviewed affiliate file. Only 2 corrective action plans were issued in 2016. Evidence supports same remediation and follow-up process is utilized for all CSPs for same services.	

Outcome #11

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

regulations.

#		1	2	7	Strengths & Comments	Findings & Recommendations
11.	Is CDDO informing person/family/guardian of available community services choices and types in or near the person's home annually?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Gatekeeping policy provided outlines process which follows state guidelines. Sample provided shows CDDO follows policies and procedures. Reviewed list of all consumers residing in ICFs from July 2015-June 2016. 100% showed annual notification letters were sent/received.	
11a	Does CDDO have documentation of ICF/IID requests?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Cottonwood CDDO provided the one request for ICF/IID admission in 2016 which was denied, as well as one request from 2015 that was approved. CDDO has documentation of all ICF/IID requests which also follow state guidelines.	

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"/>	Reviewed COCM list, which is also provided on CDDO website.	
12a	Does the council membership meet the regulatory requirements? Comprised of a majority of persons served, family members and/or guardians and includes affiliates of the CDDO for no more than 2 consecutive 3 year terms.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Review of COCM indicates council is comprised of a majority of persons served and includes affiliates of the CDDO for no more than 2 consecutive 3 year terms.	

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
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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"/>	Cottonwood CDDO has Dispute Resolution Policy in accordance with Article 64 requirements. Booklet provided annually and upon request has detailed diagram of dispute resolution process. There is a dispute resolution form available on the website. Cottonwood CDDO also produced their monthly report that details any “Dispute Resolution” Activities.	
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"/>	Dispute Resolution Policy is located on the website, as well as in booklet with detailed diagram of dispute resolution process. Review team sampled letters including notice of actions for HCBS IDD funding requests, attached is the policy so people don’t have to search for more information on disputes. Eligibility determination letters sampled state that “You may request a reconsideration of this determination”. Evidence supports that dispute resolution process is made available to all persons requesting it and to any persons whom a negative action has been initiated.	
13b	CDDO must maintain evidence of all incidence in which the dispute resolution process was initiated by any party.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CDDO has not had anyone request dispute resolution process. CDDO Director explained that they capture complaints/concerns on monthly reports to stay proactive and have resolved issues before they develop into a dispute. There is also a CDDO Quarterly Complaint Tracking Form uploaded to KDADS for	Continue to ensure dispute resolution process is made available to all persons requesting it and to any persons whom a negative action has been initiated.

					the CDDO to capture any form of dispute.	
13c	CDDO must evaluate the collected data in effort to utilize trends to improve the CDDO system.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Data evaluated in satisfaction surveys, management reports and quality oversight statistics report. Though CDDO has not had anyone use the formal dispute resolution process, CDDO uploads Quarterly Complaint Tracking Form to KDADS to track formal complaints.	

CONSUMER/FAMILY INTERVIEW	Y	N	N/A	COMMENTS
14 total respondents				
1) Have you ever changed service providers? If so, how did you receive information about all your service options?	0	8	0	0/8 Consumers interviewed have changed service providers. 2/8 noted that they received booklet and are aware of service options. The other 6 consumers did not provide further explanation.
2) Did you receive information on all service providers in your area when you found out you had funding and could begin to the process of selecting a provider?	6	2	0	1) Yes, would like info again, waiting on funding. 2) No, won't qualify for HCBS due to life insurance policy from mother. 3) Yes, received booklet with all providers. 4) Yes, received booklet with all providers. 5) Yes, received booklet with all providers. 6) No, mentioned that there were very few choices, mentioned that only one choice offered. 7) Yes, received booklet with all providers. 8) Yes, received booklet with all providers.
3) Do you know who to contact if you want to change service providers? If so, who?	7	1	0	7/8 stated that CDDO is who to contact if they want to change service providers. 1/8 stated that they do not know who to contact and will not qualify for services anyways due to insurance policy.
4) Do you believe the eligibility determination process is understandable and timely? If not, were you kept informed about the reason for any delay? If not please	7	1	0	1) Yes, but there is a long wait for services. 2) Yes, but could be quicker. 3) No, has no case manager; Aunt is doing everything, does not qualify due to insurance policy.

explain. (Interviewer: Review the definition of “eligibility determination process” prior to asking this question.				
5) Did you understand the eligibility application process? If not, please explain.	8	0	0	1) Yes, had help from TCM 2) Yes, had some help
6) Do you believe the service referral process was timely? If not, please explain. Reference definition of service referral.	7	1	0	1) No, could be quicker. 2) No, did not go through service referral process due to insurance policy.
7) Are you aware that you can appeal or request a review of a decision made by your CDDO? If not, explain.	6	2	0	1) No, not aware of appeal rights or that I can request for review of decision made by CDDO. 2) No, not aware, Aunt has been taking care of everything.
COMMUNITY SERVICE PROVIDER INTERVIEW 14 total respondents	Y	N	N/A	COMMENTS
8) Does the CDDO have an effective process for completing the annual BASIS assessment? If no, please explain?	14	0	0	1) Yes, Annual meeting with individual and team 2) Yes, the online scheduling calendar makes it easy to find a time that works for all involved.
9) Does the CDDO maintain a process to solicit (ask you) for your input on CDDO policies/procedures, major local systems change and statewide initiatives for which they represent your area? If not, please explain.	13	1	0	1) No, I have not received notice 2) Yes, we receive email updates regarding changes, etc. 3) Yes, through email solicitation and regular CDDO meetings 4) Yes, emails. 5) Yes, policies are presented both at the council of community members and at affiliate meetings.
10) Does the CDDO share information about your CSP with persons seeking services?	14	0	0	1) Yes, provider checklist. 2) Yes, I hope they do, but can't say for certain. 3) Yes, CDDO is very open about its referral system. 4) Yes, choice list. 5) Yes, organizations are represented online and through the CDDO meetings with consumers.
11) Does the CDDOs literature demonstrate impartiality regarding the CSPs in your area?	14	0	0	1) Yes, not sure, we've been told that “we didn't know that you exist.” 2) Yes, don't know.

12) Are you aware of communication in which the CDDO benefitted one CSP over another? If yes, please explain.	1	14	0	1) Only individual who commented had a Yes answer and commented, "N/A"
13) Does the CDDO manage an effective process for persons to access your services? If not, please explain.	14	0	0	
14) Does the CDDO maintain and share (if requested) a list of names of those persons interested in services who have consented to release their names?	13	1	0	1) No, we haven't received anything in quite some time. 2) Yes, I don't know. 3) Yes, don't know.
15) Does your CSPs grievance/dispute resolution process refer the person to the CDDO if the issue is unresolved? If not, please explain.	14	0	0	1) Yes, never used it. 2) Yes, I don't know. 3) Yes, don't know.
CDDO STAFF INTERVIEW ANGELA DRAKE, DIRECTOR	Y	N	N/A	COMMENTS
16) Has the CDDO refused to affiliate with a provider? If so, was the appropriate regulatory criteria applied?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No, they beg for providers to affiliate.
17) Has the CDDO cancelled/suspended an affiliate agreement? If so, was the appropriate regulatory criteria applied?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No.
18) Does the CDDO solicit input from all affiliates regarding policies/procedures, major local systems change and statewide initiatives for which they represent your area? If so, how?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Policies are reviewed each year by council of community members. They also have quarterly affiliate meetings to solicit input from all affiliates. Ask providers each year before contract negotiations if they have any burning issues. Took capacity planning to council of community members, capacity planning was different than the other CDDOs. One year not all 27 CDDOs agreed.
19) Does the CDDO maintain separate in CDDO/CSP functions? If so, how?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	There are only 3 CDDO staff, Director and 2 liaisons. CEO, VP, IT department, finance, and receptionist have shared duties. There are not separate phone lines or fax. They do have a separate network drive for the CDDO, as well as a separate website. Letterheads say Cottonwood CDDO, and business cards are blue for CDDO and maroon for CSP. All consumer files are electronic and uploaded to BCI. Only CDDO can receive BCI documents. Any paper files for CDDO are stored in CDDO liaisons office

				that is just keyed for that department. Affiliate files are on network drive.
20) Do you explain the difference between the CDDO and CSP functions to families and consumers? If so, how?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	If it comes up (informs on affiliation). They always explain CDDO functions and then go into list of providers with consumers. If it is about provider choice, they encourage them to interview providers and give a brochure on how to interview all the different provider types.
21) Do all CSPs in your area serve anyone requesting services, regardless of severity of disability? If not, please explain	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	They all know that they are supposed to, but issues still do come up every once in a while. Some CSPs do not want to serve people with extreme behaviors and some specialize in that area. Some only have men and some only have women. They work with providers who have appropriate placements to help resolve any issues.
22) Does the CDDO QA process assure services are provided in a manner consistent with Article 64 including: Choice, Person-Centered, Rights & Responsibilities, Paid/Delivered, Third party payment responsibility, Report ANE? If so, how?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes, they have consumer onsite visit form and use consumer input when they do those visits. Reports they have high satisfaction ratings. Very rarely do they have to follow up on something. They used to report to old statewide quality oversight. CDDO staff go out to every day and residential provider one time per year. Sometimes they coordinate visits with licensing.
23) Does the CDDO inform persons and providers of the dispute resolution process? If so, how?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Provided in CDDO booklet for people who are newly determined eligible and also to those who have been reassessed. Dispute resolution form is on website and they discuss it at affiliate meetings.
24) What does your CDDO do in terms of best practices, or something that may set you apart from other CDDOs across the state? What are your organizations greatest strengths?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	They perform paper and in-person reviews for funding requests. Set up meetings with consumer, case manager, guardian, family. Their funding request checklist is considered a strength and may set apart from others. CDDO receives a lot of compliments from other providers, CDDO is very friendly and accommodating. They keep things simple. They provide answers to questions for other CDDOs and network with others regularly.
25) In your opinion, what are some areas your CDDO could make improvements.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	They are very short staffed. When CDDO administration was cut, they downsized from 4 staff to 3 staff, meanwhile, CDDO area continues to grow. Downsizing out of necessity has put more and more stress on the CDDO/staff. Looking at ways to simplify things. They used to be able to visit everyone once/year for quality oversight and would like to continue that if staffing would allow.
26) What CDDO function do you find to be the most challenging?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Keeping up with all the changes and reporting requirements. Watching providers struggle with individuals with challenging behaviors. There are not many resources for individuals with mental disabilities. They need direct care staff training for behaviors.
27) What does your organization do in terms	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Cottonwood does strategic planning annually, report twice a year. Each department

of strategic planning? Looking forward over the next five years, what sort of goals may your organization be working towards?				comes up with goals. New functional assessment policy. Timeline for BASIS data entry. Always looking for ways to simplify, streamline, where can we cut. Moving towards doing all reporting in AIR and upload a copy of AIR report into BCI starting February 1, 2017.
28) How does your organization measure your success? Specifically, what sort of data does your CDDO capture? How do you analyze the data?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Satisfaction surveys to all affiliates. They were doing satisfaction surveys for eligibility determinations, but they were only getting 2, 3, or 4 a year. Department meetings, determine department outcomes and measure each year.
BASIS ASSESSOR INTERVIEW	Y	N	N/A	COMMENTS
SUSAN DAVIS, BASIS ASSESSOR				
1) Please walk us through the assessment process for an initial assessment and a reassessment. What does the timeline look like from start to completion?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Eligibility application, packet sent, tracking sheets for assessments to be scheduled before birth month. Assessors are responsible for monitoring own caseload. Once BASIS completed (which is when all material collected) they submit to KAMIS within seven days. Reassessments are usually scheduled by case managers 2 months prior to birth month.
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"/>	BASIS does not get done without seeing the person and will reschedule if person is not able to be present.
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"/>	That is the goal. Only time they do not submit in time is because they are waiting for documentation, tries to plug something in the notes. They person may be going to the doctor to get the documentation. For the most part, BASIS goes smoothly, everything is received and report BASIS to KDADS in agreed upon timeframe.
4) What do you find to be the most challenging aspect of your position?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Downsizing, time is maxed out and they have to do everything. During busy season, they perform around 50 assessments per month. Budget cuts. They also do PASK screenings, some areas are not able to do that.
5) In your opinion, what improvements can be made to the assessor process?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Taking the tier factor out of the tool would be great. Tying tiers to assessment is a struggle, with health homes, tier is tied to wages. Makes it money vs. individual, people may rather have money than improvements to affect tier rates.
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"/>	BASIS assessor roundtable meetings, regional CDDO meetings, affiliate meetings, and SRS trainings in Topeka/Wichita.