



December 1, 2017

CDDO Peer Review of Cowley County CDDO

Review Team:

Linda Young, KDADS

Colin Rork, KDADS

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Nicole Hall, Executive Director, CDDO of Butler County

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Cristy Newlin, Vocational Support Coordinator, Futures Unlimited

CDDO REVIEW REPORT SUMMARY OF FINDINGS

Cowley County CDDO
December 1, 2017

1. GENERAL COMMENTS

The review team thanks the CDDO for all the hard work, preparation and coordination to make this review as effective and efficient as possible. The Cowley County CDDO Peer Review was held on December 1, 2017 beginning at 8:30a.m. Prior to December 1, 2017, the Cowley County CDDO was last reviewed on June 19, 2013. Currently Rae Lynne Baker serves as Director of the Cowley County CDDO and she was the primary point of contact for KDADS throughout the review process. Desk review materials were submitted timely, all information requested was received. Files and samples were separated and labeled by specific outcome, and all required documentation was supplied for the on-site review. The organization of on-site review materials was very helpful and much appreciated.

2. IDENTIFIED STRENGTHS

1. **Entry of Basis/Functional Assessment Information into the KAMIS system-** All files sampled showed 100% compliance with the seven-day entry standard for this item. CDDO staff often entered information into the KAMIS system within 1 -2 days of the Basis functional assessment being completed.
2. **Affiliation Information** – The CDDO had some good information regarding how they handle requests for affiliation, including information they give out regarding the licensure process.
3. **Choice Form Signatures:** The CDDO appears to consistently obtain signatures of both the guardian and individuals who are able to participate when changes in service providers are being implemented, which indicates they value the importance of having those individuals receiving services be a part of this options process.
4. **Annual dissemination of Dispute Resolution information:** The CDDO has a good process in place to educate and inform their consumers of their right to dispute resolution and how to access this information.

3. RECOMMENDATIONS FOR CDDO

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

Issue: The CDDO had several policies which were out of date or did not contain current processes/procedures due to changes at the state level.

Recommendation: The CDDO needs to update these policies to reflect current practices.

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

Issue: The CDDO had an inaccurate affiliation agreement with Brighter Futures. Brighter Futures was not listed as an affiliate on the provider options list.

Recommendation: The CDDO needs to update the Brighter Futures Affiliate agreement to reflect the current services available. The CDDO should consider adding this entity to the choice list with an indication that they are closed for referrals due to their limited licensing status.

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

Issue: The CDDO currently has two forms/documents they use when processing requests for crisis funding that they send out on different time frames.

Recommendation: The CDDO should consider combining the two forms to streamline the process which would improve the overall response time for completion of this task.

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

Issue: The CDDO established policy for the processing of eligibility applications does not clearly outline a timeframe for which the CDDO will have an eligibility application reviewed and a determination made. There was feedback from consumer interviews that the eligibility process was possibly non-timely and there was also noted confusion from consumers about how long the CDDO has to process the application from start to finish. Based on feedback comments, overall communication with entities applying for services generally might need to be improved.

Recommendation: KDADS would like to see these timeframes added to the policy language. CDDO should work to improve timeliness of the application process and look for ways to improve general communication with those seeking access to services.

- 5. Outcome 9 – CDDO will maintain a process in coordination with affiliates that results in services being offered and provided in a way that does not discriminate against any persons because of severity of person’s disability – Monitoring Activity 9.**

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

Recommendation: The CDDO should plan to add this language to the affiliation agreement.

4. FINDINGS

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

Issue: The CDDO had a “Single Point of Application, Determination, Referral and Requests for Changes in Service Provider” policy which outlined in Section 2a and 2b what their initial training requirements are for eligibility staff. The current policy only address that staff have to be trained on the following two issues: types of community services available in the Cowley County area and potential referral contacts for persons who are determined not to be eligible for services. There was no specific policy/procedure outlining the initial and ongoing training requirements. Since the CDDO’s inception in 2010, two staff have been responsible for determining eligibility decisions. One staff is no longer employed. Review of the current staff’s training file showed trainings which were completed in 2016 and 2017, however, no formal documentation of training prior to that time was found. The current information currently reflected in the present policy does not appear to be that inclusive of what training requirements should be completed by staff to be fully competent in this task, nor does it address what ongoing training should be completed.

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

- 2. Outcome 10: CDDO will maintain a locally developed impartial QA process that reasonably address regulatory requirements- Monitoring Activity 10**

Issue: The CDDO’s current policies for Quality Enhancement and Quality Assurance are not up to date and do not accurately reflect what the current CDDO QA process is. Policies need to be updated. The site review tool being utilized does not measure all the items reflected in the current policy. The current site-review tool does not appear to be sensitive enough to identify potential concerns within the service system as reviews generally come back marked with “no areas of

correction”. The CDDO is not conducting on-site monitoring reviews of their own at this time. The CDDO just implemented some tracking of CIR reports (current policy does not reflect this information). This practice had been stopped and has now been reimplemented. This information needs to be consistently documented, trended and followed to ensure appropriate ANE follow up is completed. The CDDO provided inconsistent evidence from the sample set provided during the on-site review that CIR reports were being followed up on, although this area has seemed to have improved in recent months. The CDDO should evaluate what other types of reports need to be tracked/trended for system improvement and monitoring. All pertinent QA information should be reported to the COCM who is the identified CDDO QA Committee. Meeting minutes for the COCM meetings have not always reflected what items are being presented to the QA Committee for review and oversight. The CDDO just recently implemented new protocols for follow up on ANE reports and new protocols for CDDO response when affiliates are issued a Notice of Findings from KDADS licensing staff. This should help with more oversight of the affiliate network. The CDDO has been on a corrective action plan in this area which is currently unresolved. KDADS acknowledges that some progress of correction in this area has been made, but there is further work to be completed to bring this issue into compliance fully.

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

6. BEST PRACTICE RECOMMENDATIONS:

1. As far as the agency website, the CDDO may want to consider the feedback comments/suggestions which were made by the review team members in general which are listed in Section 1, Question 3 of the Peer Review Document.
2. Even though the CDDO had some methods in place to solicit feedback from their affiliates/others regarding ways to improve their overall CDDO operations, the CDDO should also look strategically at systematic issues they are finding with their overall system delivery system. For example, this could include workgroups about issues of concern the CDDO is identifying through the Basis/Functional Assessment data collection process, affiliate performance issues or through the general Quality Assurance process, via tracking/trending of reports (once the QA system has been updated). Also, the CDDO should consider adding a specific agenda item to solicit feedback during targeted meetings so this is on the agenda at all times as a mechanism to gather this on-going feedback.
3. The CDDO may want to consider adding the target expiration date to the COCM membership list for any active members on the council. The CDDO should consider adding the CDDO representative’s name to the COCM membership list as well.

4. The CDDO may want to consider the periodic development and dissemination of a newsletter to be sent to guardians/individuals. (especially those who are waiting for services). Newsletters can be a good way to stay in touch with individuals and they can provide insight to what is available, or any changes/updates. Guardians/individuals may opt to receive an electronic newsletter update so they can stay informed.

SUMMARY:

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

Peer Review Tool

Review Team Members:

- 1) Linda Young, PICS, KDADS
- 2) Colin Rork, PICS, KDADS
- 3) Joshua Gilbert, PICS, KDADS
- 4) Nicole Hall, Director, CDDO of Butler County
- 5) Rachel Crigger, TCM Supervisor, New Beginnings
- 6) Cristy Newlin, Vocational Supports Coordinator, Futures

Date of Review: December 1, 2017

CDDO Name: Cowley County CDDO

CDDO Address: 311 East Ninth, Winfield, KS 67156

Contact Person: Rae Lynne Baker, Director

Phone Number: 620-221-5404

Email: rbaker@cowleycounty.org

Scoring Compliance Key

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

ACRONYM REERENCE GUIDE

“ANE” Abuse, Neglect, Exploitation

“BASIS” Basic Assessment and Services Information System

“CDDO” Community Developmental Disability Organization

“COCM” Council of Community Members

“CSP” Community Service Provider

“ICF” Intermediate Care Facility

“ICF/IID” Intermediate Care Facility for Individuals with

Intellectual Disability

“KDADS” Kansas Department for Aging and Disability Services

“PD” Position Description

“QA” Quality Assurance

Program Contact:

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Desk Review Activities - Section I
Review of Policies and Procedures, Website & Newsletters

#		1	2	7	Strengths & Comments	Findings & Recommendations
1.	CDDO ensures that its policies are distinct to the CDDO, and CDDO operated CSP policies are distinct to CSP. CDDO and CSP functions are governed by two distinct sets of policies.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The Cowley County CDDO is an independent CDDO entity and it is not affiliated with a CSP provider. Cowley County CDDO presented their current policies/procedures for review. These policies were last updated in 2011 and 2013. The Preface/Definition section included with the policies/procedures was very useful. All policies/procedures do reference a corresponding regulation number.	<p>Recommendation: Please review/update your policies to consider feedback listed below:</p> <p>There were some notations to mental retardation which appears to be outdated language in the document.</p> <p>General BASIS language noted throughout policies. Need to include functional assessment language.</p> <p>Policy 002: References the process for Plans of Care which no longer exist, or MCO completes. Also, funding levels are the function of the MCO. Background check information needs to be revised to match current KDADS memorandum from 11-24-2017. References that BASIS data will be entered into the system in the individual's birth month, not within the seven-day time frame from completion of the functional assessment. Mentions the CDDO communicates annually with each individual and or guardian and sends a satisfaction survey, which the CDDO indicates in no longer being completed. Unclear what statement i. means about affiliate providers who employ 20 or more direct care staff may seek a contract with the department for direct payment in lieu of payments through Cowley County CDDO Department.</p>

					<p>Policy 003: Appears the CDDO attempts to attend transition meetings when these occur. Policy Refers to ID services, not sure this is the appropriate language. Policy indicates that the CDDO distributes a CDDO Service Access List at monthly affiliate meetings. This is no longer being completed. What does the CDDO do with the information they've collected based on those responses? Does not outline timeline for completion of eligibility determinations. Policy does not clearly outline eligibility staff training program. No specific stand-alone policy on eligibility training requirements was noted.</p> <p>Policy 004: Policy indicates that the CDDO shall develop and implement procedure to impose consequences for failure to adequately perform case management duties. What have they developed? Could spell out consequences better.</p> <p>Policy 005: Policy does specifically outline the provision that affiliates cannot discriminate based on severity of disability. How does an affiliate inform the CDDO that they are at capacity? Could spell out procedure better.</p> <p>Policy 006: Procedure statements the wording in this section is unclear and doesn't appear to relate to the policy statement. This policy also indicates that</p>
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					<p>an annual satisfaction survey is completed which is no longer being done.</p> <p>Policy 007: Not sure current checklist completed by COCM members captures all these items listed under procedure section. Policy needs updated to capture current processes of how QA is completed overall.</p> <p>Policy 008: Uses BASIS language. Update to functional assessment. Statement in 2b needs clarification. Is this still relevant? Policy has not been updated to reflect changes since Kan Care was implemented.</p> <p>Policy 009: Does not quantify that the information to individuals residing in ICF placements is completed annually. Timeframe needs added.</p> <p>Policy 010: Indicates those waiting for services are contacted annually to determine the continued need for services. The CDDO currently does not complete this process. Again, references that the service access list is provided to affiliates at the monthly affiliate meetings. CDDO indicates they have not been contacting those on the wait list annually through a specific process. They have also not been providing a list of people of the wait list to providers at affiliate meetings as policy indicates. Policy needs updated to reflect current practices.</p>
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						<p>Policy 011: Indicates that the COCM is involved in the development, implementation and progress reporting as to local capacity building plans. Policy could be clearer in the role the COCM is taking in this matter.</p> <p>Policy 012: References Director of KDADS. Language needs updated.</p> <p>Policy 013: No references to state aid processes for distribution of dollars.</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"/>	The CDDO does not have a newsletter.	N/A
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 website for its' operations. The website covers all the minimum requirements and included information of necessary/required forms, CDDO policies/procedures and all affiliate information. The CDDO news link provides information on current events and different opportunities which are upcoming. The link does have reference to both Article 63 and 64 requirements. The site does name and feature all CDDO staff who work for their organizations along with their job titles. The website does list the CDDO general telephone and fax numbers. The home page provided a lot of information and informative links to describe what the CDDO is, its functions and how to become an affiliate. The additional	<p>There were some suggested changes to the website as listed below:</p> <p>The PDF application for Community Council was good; however, there was no general information found on the website to explain to the public what the council was or what their function is.</p> <p>The website indicates that the application for the COCM requires a background check. The CDDO indicated that the information on the website needs clarification to indicate the Volunteer Applicant does not have to pass this check.</p> <p>Capped affiliates who are not accepting referrals might be listed on the website. Service Provider Page seemed a little confusing to someone seeking services. The services listed at the bottom are a</p>

				<p>CDDO resources page appears to be beneficial and highlights information on Abuse, Neglect and Exploitation, which includes a link to the DCF website and the ANE hotline. Below the list of affiliate providers, the CDDO provided detailed definitions for each type of service offered. The apply for I/DD services link provides information and steps to apply for services.</p>	<p>combination of HCBS services and non-HCBS services. It might be easier for guardians/individuals to make the distinction between these if they were not lumped together. Also, some of the titles for these services do not match the technical service name (is Day Habilitation vs Day Supports). For someone moving into the CDDO area, looking to replace their Day Supports listed on their MCO service plan, they may question if this is the same service offered as they are currently receiving. Under Apply for IDD, it is highlighted who “meet certain qualifications”. When you press on this highlighted area, it takes you to service providers. In another section for criteria for IDD, it takes you to a link to contact the office.</p> <p>Psych Resources section: Address for New Perspectives is incorrect.</p> <p>Invisible Kansas Link is broken. Families Together website link did not work one day; however, later worked when tried a second time.</p> <p>There is a lot of information on the website; however, the CDDO may want to consider organizing the information generally into more user-friendly categories so that things can be better located on the site.</p>
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On-Site Review – Section II

Outcome #1

K.A.R. 30-64-20 - CDDO Maintains data regarding CDDO Review Improvement Plans (if any) requested during past review period including rebuttal and date.

#		1	2	7	Strengths & Comments	Findings & Recommendations
1.	CDDO submitted a performance improvement plan to KDADS as requested. There is documented plan available. Review team and KDADS approved plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CDDO is not being held accountable to this regulation this peer review cycle.	N/A
1a.	CDDO maintains and monitors data for performance improvement plan. CDDO maintains data in a manner that allows evaluation.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CDDO is not being held accountable to this regulation this peer review cycle.	N/A
1b.	CDDO is responsive to data results. CDDO has revised the performance plan as needed.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CDDO is not being held accountable to this regulation this peer review cycle.	N/A
1c.	Completion of improvement plan items occurred. Items completed within timeline and is verified by data and/or outcomes.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CDDO is not being held accountable to this regulation this peer review cycle.	N/A

Outcome #2

K.A.R. 30-64-21 - CDDO Maintains policy and procedure changes that are approved as required.

#		1	2	7	Strengths & Comments	Findings & Recommendations
2.	CDDO will initially and on an on-going basis, follow the regulatory process when developing policy. Did CDDO run policy/procedure changes through the appropriate process: COCM Input, Board Approval, KDADS approval?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The CDDO submitted current policies, which were last updated in 2011 and 2013. The CDDO provided evidence of the public notice period and review of the policies by the COCM and board of directors and previously by KDADS.	Recommendation: Many policies were out of date and did not contain current processes/procedures due to changes at the state level. These policies need to be updated to reflect current practices. Please see Question Probe #1 to see recommendations for changes/updates.

Outcome #3

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

#		1	2	7	Strengths & Comments	Findings & Recommendations
3.	CDDO maintains affiliate agreements with all affiliates. Does CDDO have current affiliate agreement for each affiliate?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The CDDO provided the review team with current affiliate agreements for all affiliates for the on-site portion of the review. Most agreements have been signed since 2013 to the current year. All agreement appendix attachments were accurate, except for one provider. The affiliate agreements executed matched the services listed on the options counseling provider choice form.	Recommendation: Please update the Brighter Futures Affiliate agreement to reflect the current services available. The CDDO should consider adding this entity to the choice list with an indication they are closed for referrals due to their limited licensing status.
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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CDDO has not cancelled or suspended any affiliate agreements.	N/A

	jeopardize the CDDO's ability to fulfill its responsibilities.					
3b.	Did CDDO report BASIS information to KDADS in the agreed upon timeframe? (All functional assessments shall be entered into KAMIS within seven calendar days of completion of the assessment.) KDADS will sample completed assessments and dates to compare against KAMIS entries (5 days to initiate assessment from date of request, 30 days to complete assessment from date of request, 7 days to enter in to KAMIS).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	KDADS reviewed a random sample of 20 individuals who had BASIS/functional assessments in the last year. The CDDO provided evidence showing that BASIS/functional assessment information was entered into KAMIS in the agreed upon timeframe for all individuals sampled. Most had been entered within a 1 -2-day time frame. The CDDO also had internal processes outlined as to how they handle the Basis/Functional Assessment process and their Re-determination of Eligibility process.	No concerns noted.
3c.	Following a sample of crisis/exception requests, do CDDO processes/procedures meet state guidelines?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	KDADS requested a sample of 4 crisis/exception requests. A spreadsheet of those seeking crisis services and their tracking information was also provided. Evidence indicates CDDO is following crisis and exception process as outlined by KDADS for those approved for crisis funding. CDDO has a form for crisis requests and a policy checklist for tracking information needed to process the requests. There is a separate form sent out upon request that goes to the consumer/guardian that allows the potential person served to check services they would like to access. All denials contained information which outlined appeal/dispute rights.	Recommendation: Please consider adding a signature line and combine the two forms currently being utilized. This would allow the process to be initiated upon request and the CDDO would not have to wait for signature to be returned before starting the process and supplying crisis/exception information.

3d.	Following a sample of eligibility determinations, do CDDO processes/procedures meet state guidelines? For example, was each person provided with “comprehensive options counseling?” Is the functional assessment/or reassessment occurring within the stated timeframe?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The CDDO has a policy “Single Point of Application, Determination, Referral and Requests for Changes in Service Provider 003” which was reviewed. The CDDO provided a spreadsheet of individuals who had eligibility determinations over the past year. A sample set of 3 files were selected for review of this indicator. Processes/Procedures meet state guidelines and evidence shows they are implemented as written. The review of the files indicate that individuals are receiving comprehensive options counseling through face to face meetings. Initially, all options are shown and the individuals choose what services they wish to receive. An informational intake packet is given to each individual/guardian which includes a choice referral checklist, checked and signed acknowledgement of individual rights and dispute resolution information received and consent/release of information forms. Results of the eligibility assessment were communicated directly to the individual/guardian. Those denied eligibility were advised of their appeal rights. Information was entered into KAMIS appropriately and all eligible files had the appropriate options counseling forms signed.</p>	<p>Recommendation: The established CDDO policy does not clearly outline a timeframe for which the CDDO will have an eligibility application reviewed and a determination made. Would request that this timeframe be added.</p>
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3e.	Following a sample of provider case transfers inside and outside the CDDO catchment area, does CDDO ensure processes/procedures meet state guidelines?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The CDDO has a “Continuity and Portability of Services 008” policy. KDADS sampled 8 provider case transfers inside and outside the CDDO catchment area. The team reviewed the CDDO Area Tracking Form document, referral and transfer checklists and the Notification of Options Counseling form. There was evidence of correspondence in the files between transferring entities. For transfers into the area, the CDDO sends brochures/information about the local service area and the general transfer process. The transfer forms reviewed were consistently signed by the receiving CDDO entity. Evidence demonstrates CDDO processes/procedures meet state guidelines.	No concerns noted.
3f.	Following a sample of affiliation agreements, does CDDO ensure agreements are uniform for like services? CDDO operated CSP must have an affiliation agreement with CDDO. Affiliation agreement cannot extend advantages not offered to other CSPs.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All affiliate agreements reviewed are uniform for like services. There is no evidence any agreement extends advantages not offered to other CSPs, and no evidence that the sponsoring CSP is extended any advantages.	No concerns noted.
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"/>	Advisory Board minutes’ show a survey for all providers completed for KU to create a capacity report. Affiliate updates are included at all meetings. Evidence shows CSP’s have some opportunity for input from affiliate meetings, advisory board meetings, special funding group	Continue to look for ways to engage your affiliates/others into feedback about your global CDDO operations in general. This could include workgroups about issues of concern you are identifying through the QA process, through Basis data collection, or through tracking/trending of your QA

					meetings, service review-funding group meetings and at COCM minutes. There is no specific agenda item on these meeting minutes asking for specific input into the system.	reports for example (once your QA system has been updated). Consider adding a standing agenda item to all meetings in which you chose to solicit specific feedback. The Quality Enhancement Policy 006 indicates that consumers/guardians are given an opportunity to complete a satisfaction survey annually which is not occurring, so as indicated previously the policy needs updated.
3h.	Does CDDO have any individuals who work for both the CDDO and the CSP? If so, review a sample of PD's.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The CDDO is an independent standalone CDDO so this is not an issue.	N/A
3i.	CDDO will maintain a separation in function between the CDDO and CSP management and operations. It is clear which functions are CDDO and which are CSP. If there are personnel that work for both entities their position description reflect such. Paper and electronic information is stored securely to ensure CSP division of a CDDO does not have access.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The CDDO is an independent standalone CDDO so this is not an issue.	N/A

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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The CDDO has a policy "Implementation Responsibilities of CDDO 002" which outlines the process for affiliation. The policy addresses the affiliation process and states the general affiliation requirements. The CDDO also has an	No concerns noted.

	affiliation requirements. Evidence of a policy/procedure and it is followed.				affiliation checklist which outlines the information used for affiliation. Information is also listed on the website. There had been one request for affiliation this past year; however, the individual interested did not yet have a license in place. The CDDO did provide evidence that they identify the current status of all requests. The CDDO also provides information on how to become licensed, however, in this case, the entity inquiring has not yet been able to complete the licensing process. There appears to be evidence of a process for affiliation and its' monitoring by the CDDO.	
4a.	CDDO must maintain documentation that identifies the current status of all individuals/entities/applicants requesting affiliation, including notification of appeal/grievance rights. Evidence of a process for affiliation and its monitoring.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The CDDO has a policy "Implementation Responsibilities of CDDO 002" which outlines the requirements. An example of email correspondence with potential affiliates was reviewed. The affiliate spreadsheet was reviewed and showed that there were a few current affiliates showing interest in on-boarding at this time. The affiliate file shows monitoring of the affiliation process.	No concerns noted.

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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The CDDO has the "Single Point of Application, Determination, Referral and Requests for Changes in Service Provider 003" policy. They have a service/provider options form which	No concerns noted.

	policy and procedures ensure all CSP options are shared.				identifies all the choices within the affiliate network. The form was accurate when reviewed and also highlighted agencies which were presently capped for referrals. Also, upon intake eligibility, the CDDO has a Notification and Acknowledgment Initial form they have the individual/responsible party sign which confirms options counseling information was shared, rights were distributed, dispute resolution information was provided and consent to /for receipt/release of information was explained. They also provide a list of sample questions which the individual might want to ask TCM providers before making a provider choice.	
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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"/>	The CDDO supplied Quarterly State Aid Tracking reports. The CDDO is currently distributing the funds impartially and is distributing funds within the approved categories. Funding is being used for individualized needs on a case by case basis (as documented through a Special/Individual Funds Request Form), to fund an annual COCM picnic, to fund costs for athletes to attend Special Olympics and for general transportation, which is distributed in a 4 th quarter payment. All funding is expended	Originally, the report indicated KDADS had a recommendation in this area. The CDDO subsequently supplied additional information after they had received the report to show that it did have a distribution formula in place. KDADS therefore is removing the recommendation it initially had. This section of the report has been updated to reflect the additional information KDADS received. There are no further concerns noted in this area.

					<p>annually. The current funding formula was first developed in 2014 when new taxonomy codes were distributed. Funding allocations are approved annually by the Advisory Board and the Cowley County Commission, after the CDDO has solicited feedback on the funding formula from affiliates who are appointed to the board or those who attend special funding committee meetings..</p>	
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Outcome #7

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

#		1	2	7	Strengths & Comments	Findings & Recommendations
7.	Eligibility staff have been trained per regulation. CDDO has developed a training program and such have been approved by COCM. Evidence eligibility staff have completed identified requirements.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The CDDO had a policy “Single Point of Application, Determination, Referral, and Requests for Changes in Service Provider, 003, which outlined in Section 2a and 2b what their initial training requirements are for eligibility staff. This included training on types of community services available in Cowley County and potential referral contacts for persons who are determined not to be eligible for services. The CDDO has no specific standalone policy which addresses training requirements for eligibility staff. Upon inception of the CDDO in 2010, two staff have completed eligibility, with one staff having left employment and the current Director of the CDDO completing these duties.</p>	<p>The CDDO produced documentation of training which had been completed for their eligibility staff in 2016 and 2017. The training topics outlined within the current policy for initial training requirements however were not found to be documented in the staff’s personnel file when the staff were originally hired. This information needs to be documented. It is also recommended that the CDDO consider developing a specific policy to address this requirement or update the section in the current policy to reflect what specific training requirements are as the policy seems to more specifically address initial topics which need to be trained on and are very non-specific on the requirements</p>

						needed for on-going training. KDADS will be issuing a finding on this item. KDADS would like to see the CDDO develop a plan with timelines to address this issue. The plan will be due to KDADS within 30 days of receipt of this report.
7a.	CDDO policies and procedures are impartially implemented as written for the process that is utilized for persons wishing to change CSPs in that CDDO area. Policies and procedures are implemented as written.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The CDDO had a “Single Point of Application, Determination, Referral, and Requests for Changes in Service Provider Policy 003”. They also had a procedure outlined in their internal processes manual. The processes manual provides step by step instructions of the process. Feedback from the interviews completed with guardians seems to support that the CDDO is implementing these policies/processes as written. The CDDO uses a Client Transition Questionnaire form for the transition process. This form appeared to be very comprehensive.	No concerns noted.
Outcome #8						
K.A.R. 30-64-23 - Informed Choice of Community Service Providers						
#		1	2	7	Strengths & Comments	Findings & Recommendations
8.	CDDO effectively maintains documentation of service provider change/transition requests/notifications. Notifications are maintained.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	A sample pull of 13 files were reviewed. The “Single Point of Application, Determination, Referral, and Requests for Changes in Service Provider 003” policy was also reviewed. From the sample set reviewed, it appears the CDDO is implementing the policy as it is written. Also, consumer files sampled had a completed choice form with an	No concerns noted.

				appropriate signature being obtained from either the individual or guardian or both entities when relevant. The CDDO provided evidence of emails to TCM/care coordinators regarding any changes which were being initiated. The CDDO has also developed a transition checklist form which is to be completed by providers when changes in services are being made which helps to ensure that all relevant information is communicated during the transition period.		
Outcome #9						
K.A.R. 30-64-25 - CDDO will maintain a process in coordination with affiliates that results in services being offered and provided in a way that does not discriminate against any persons because of severity of person's disability.						
#		1	2	7	Strengths & Comments	Findings & Recommendations
9.	CDDO process is effective. All persons that request services, for whom funding is available, receive requested services. Review: affiliate agreement; policy/procedure; any agreements for provider specialization and capped capacity.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The CDDO has "Uniform Access 005" policy which states that affiliates can specialize, but cannot do so based on an individual's severity level of their disability. This specific language was however not found in the current affiliation agreement. The current options counseling choice form also is marked if an affiliate is currently capped for the acceptance of new referrals. There were no current organizations found that are currently specializing in specific services at this time.	Recommendation: No specific language was found in the affiliate agreement regarding the requirement to serve individuals regardless of their level of severity. The language was found in the policy. Would recommend that the CDDO add this language in their affiliate agreement as well.
9a.	CDDO identifies number of persons the Secretary of KDADS has determined inappropriate for community services because the	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The CDDO has not had any persons the Secretary of KDADS has determined inappropriate for community services	N/A

person presents a clear and present danger to self of community.				because the person presents a clear and present danger to self and community.	
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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"/>	The CDDO has two policies “Quality Enhancement 006” and “Quality Assurance 007”. The policies indicate that the COCM is the quality assurance committee. The policy indicates that the COCM on-site checklist reviews the following items: health environments, medications are administered properly, services delivered are paid for in accordance with service agreements, ANE, confirmed ANE has been corrected, services are responsive to the PCSP, there are opportunities for choice and the consumers’ rights are protected. TCM staff are completing 100% self-reviews of their own files. COCM members complete some follow up reviews (10%). The CDDO is to be completing some reviews as outlined in a previous CAP issued to the CDDO in this area. The CDDO has issued some feedback on the site review tool instrument. The CDDO	The “Quality Enhancement 006” Policy needs updating as previously indicated. The “Quality Assurance 007” policy is very vague. It does not specifically outline the QA process as it is currently implemented. The policy does not indicate a 100% self-review by TCM’s, the number of sample size reviews completed by council members or CDDO reviews which are to be completed. CDDO indicates they have not yet began their on-site monitoring of reviews they had committed to completing. The on-site checklist does not seem to measure/monitor all items listed in the policy as outlined. The form does not currently include questions related to medications/medication administration. No references on form to ANE or PCSP monitoring as indicated would be monitored per the policy. The site visit tool itself does not appear to be

				<p>did recently develop and implement at ANE Protocol and a NOF protocol. A sample file review of CIR reports did not reveal consistent follow up on issues by the CDDO, although there appears to be more consistency in follow up occurring in the past few months. They also just began meeting with their local KDADS licensing staff on a regular basis to review affiliate issues within their service area. The CDDO just reinstated tracking of CIR reports that come into their system. The CDDO had been tracking the number of site reviews being completed. The COCM meeting minutes were reviewed. These indicate some information about the QA process is being reported to the COCM's but not all information is reflected in the minutes kept. Minutes could be more detailed.</p>	<p>sensitive enough to pick up issues within the service system. From information provided, most reviews come back with "no issues identified to be corrected". The site review tool probably needs to be revamped to be more inclusive in looking at indicators. Also, the CDDO should evaluate if this tool should not be the only tool used to measure success or satisfaction. Most QA programs utilize a variety of evaluation methods/tools. The CDDO had agreed to conduct a minimum of one site visit per quarter. It would be good practice for the CDDO to consider checking items other than what the TCM's and COCM members are checking or even to have the COCM members focusing on other issues throughout the system if the CDDO is going to continue to utilize the Council as its' official committee. The COCM, as the QA committee, should have all information about the service system reported to them that deals with QA. This should include an overview of system demographics such as numbers of the waiting list, complaints received and resolved by the CDDO, number of ANE/CIR reports. Follow up actions regarding affiliates, etc. Meeting minutes for the past year do not currently reflect that all information is being shared with the committee so it can be monitored</p>
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						adequately. Further development of tracking and trending reports should be developed and pursued so that these issues are reported to the QA committee for system improvement and informational purposes. Also, the trends the CDDO is globally identifying through the QA process, if significant and show ongoing prevalence, these would be good areas to possibly develop CSP workgroups around to systematically try to remediate issues instead of just working with each provider individually as the CDDO has been. Doing this will show evidence that the CDDO is potentially asking for CSP provider input into the overall operations system. The CDDO needs to continue to keep and provide evidence of their follow up to CIR events. KDADS will be issuing a finding on this item. KDADS would like to see the CDDO develop a plan with timelines to address this issue. The plan will be due to KDADS within 30 days of receipt of this report.
10a	CDDO maintains evidence that the same remediation and follow-up process is utilized for all CSPs for same services.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The CDDO indicated they issued no corrective action plans. They recently started meeting with KDADS licensing staff to improve and increase communication regarding their affiliate network which will strengthen follow up	No corrective action plans to review, since none had been issued. The plan to meet routinely with licensing staff will help with follow up by the CDDO of ANE and licensing compliance matters; however, as noted above, the CDDO needs to continue to refine their Quality

					with affiliates regarding ANE and licensing compliance issues.	Assurance system to better monitor their affiliate network in the areas of paid/delivered services.
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Outcome #11

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

#		1	2	7	Strengths & Comments	Findings & Recommendations
11.	Is CDDO informing person/family/guardian of available community services choices and types in or near the person’s home annually?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The CDDO only has one individual residing in an ICF/IID placement at this time. The CDDO did provide evidence of what they send to each consumer annually which included a personalized cover letter, a provider choice form, Rights as outlined in Article 63 and Article 64, information on the CDDO department which included information on the COCM, Advocacy organizations and brochures regarding local providers.	No concerns noted.
11a	Does CDDO have documentation of ICF/IID requests?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The CDDO has a “Gatekeeping 009” policy which was reviewed. The CDDO indicated that they had no requests within this past year for admission to an ICF facility.	No requests to review.

Outcome #12

K.A.R 30-64-31 - CDDO maintains a council of community members that meets the regulatory requirements.

#		1	2	7	Strengths & Comments	Findings & Recommendations
12.	Did CDDO provide a list of the council of community members?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes, a list was provided.	No concerns noted.

12a	Does the council membership meet the regulatory requirements? Comprised of a majority of persons served, family members and/or guardians and includes affiliates of the CDDO for no more than 2 consecutive 3 year terms.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The CDDO has a policy “Council of Community Members”. There were 18 total individuals listed on the membership list. The majority of council members on the list did include a majority of individuals served/guardians/or family members (11 members). CDDO representation on the council was not listed. The CDDO had identified on the membership list when each individual’s term started. They had tracked when each individual began on the council, but had not identified a target date of when membership term limits would expire. It appears individuals are recruited annually so term expiration dates would be staggered. Minutes are kept of Council Meetings and meetings appear to be pretty well attended.	Please consider adding the target expiration date to the list for any active members on the council. Also, please add the CDDO representative’s name to the membership list. There was one name of an individual on the list whose term expired in the fall of 2017 and the individual was not expected to be replaced on the council until January 2018. The CDDO was aware of this and indicated verbally that if this individual would have shown up to the one business meeting, that individual would have been recognized for his service, but would not have been allowed to vote on matters. Tracking term expiration dates would avoid these types of situations from possibly presenting themselves in the future.
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Outcome #13

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

#	1	2	7	Strengths & Comments	Findings & Recommendations	
13.	CDDO has policies/procedures implemented as written and approved in accordance with Article 64 requirements, and clearly addresses how persons requesting/receiving services and family members receive information regarding the CDDO complaint/grievance process is accessed.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The CDDO has a current policy “Dispute Resolution 012” to address the dispute process. The CDDO indicates that the policy and subsequent information is shared annually with all individuals receiving services after basis meetings occur and the policy is posted on the CDDO website. Also, they have this listed as a “right” on the individual rights which are disseminated.	No concerns noted.

13a	CDDO will maintain evidence that the dispute resolution process is made available to all persons requesting it and to any persons whom a negative action has been initiated.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	KDADS reviewed a sample set of 13 files in which adverse actions had been taken by the CDDO in the past year. All files had evidence that individuals/guardians had been notified of their appeal rights and were given dispute resolution information. There was also evidence in some cases that the individual's MCO and TCM providers were also emailed when an adverse action had been taken.	No concerns noted.
13b	CDDO must maintain evidence of all incidence in which the dispute resolution process was initiated by any party.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The CDDO supplied quarterly complaint tracking forms for the teams' review. None of the issues tracked rose to a level of a formal dispute. The CDDO provided notes on the complaint tracking form outlining the steps taken to resolve the issues. There was evidence provided to indicate the CDDO is following their policies/procedures as outlined.	No concerns noted.
13c	CDDO must evaluate the collected data in effort to utilize trends to improve the CDDO system.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Since there have been no recent formal disputes, the CDDO has not tracked or analyzed this small sample set. However, the CDDO does upload the Quarterly Complaint Tracking Form to KDADS to track complaints.	The CDDO needs to be prepared to track and analyze data on disputes if more are filed in the future.
CONSUMER/FAMILY INTERVIEW		Y	N	N/A	COMMENTS	
2 total respondents						
1) Did you understand the eligibility application process? If not, please explain	1	1	0	1) Do not feel the entire ins and outs of the process was very well explained. Communication about the overall process and with the individual/family applying services could be much improved. 2) Yes		

2) Do you believe the eligibility determination process is understandable and timely? If not, please explain.	0	2	0	<p>1) 1 year from start to finish. Not very timely, which caused other eligibility applications to be denied for other programs.</p> <p>2) No. Very unhappy with the CDDO office there. I had to call weekly to get things Done and then that does not always resolve the issue. I had to get some Guardian Ad Litem involved to call them to get a response. Communication is not very good. You send things and they either lose things, misplace things or don't communicate if you are needing to send in other items. They do not provide very good guidance or assistance on questions when you have them. They are not very prompt on getting things processed.</p>
3) Do you believe the service referral process (including options counseling) was timely? If not, please explain.	2	0	0	<p>1) Yes, this was timely.</p> <p>2) No concerns. At a residential program, right now.</p>
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.	1	1	0	<p>1) Yes, in the paperwork we received.</p> <p>2) Don't believe so.</p>
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?	1	0	1	<p>1) No comments.</p>
6) If currently receiving services, have you ever changed service providers? If so, how did you receive information about all your service options?	0	0	2	<p>1) Have not changed providers</p>
7) If currently receiving services, do you know who to contact if you want to change service providers? If so, who?	1	0	1	<p>1) No comments.</p>
8) Do you have any other information regarding your interactions with the CDDO that you would like for us to consider?			0	<p>1) Staff do not seem very sympathetic or empathetic. The interactions with staff were very frustrating.</p> <p>2) Need to be more prompt in processing requests. You never hear anything back from them. When you call, they often say they don't have your information. I then have to produce emails to show its' been sent to them. Then later information</p>

				is found which causes delays in services being approved and provided. Timeliness is an issue. Need to drastically improve their communication with outside parties. Staff do not seem that friendly or warm when you see them face to face. A request for another process went unanswered for several weeks until I followed up.
COMMUNITY SERVICE PROVIDER INTERVIEW	Y	N	N/A	COMMENTS
7 total respondents				
9) Does the CDDO have an effective process for completing the annual BASIS assessment? If no, please explain?	7	0	0	1) However, the CDDO feels they can tell the CSP's how to write plans and if it is not to their liking, they won't count the information towards the tier determination. 2) There is a process. I know that a new process is being explored at this time. Hoping that it is more consistent. 3) I have no idea what this is.
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.	6	0	1	1) Community Council, Affiliate Meetings 2) Affiliate meetings are utilized for these types of discussions. 3) Thru email.
11) Does the CDDO share information about your CSP with persons seeking services?	6	0	1	1) The CDDO has a flyer listing all provider of services to provide options counseling. 2) I believe so. They do request brochures to be available so that they can be given to individuals looking for services. 3) I think?
12) Does the CDDOs literature demonstrate impartiality regarding the CSPs in your area?	6	0	1	1) However, there have been some guardians reporting that the CDDO provides negative feedback regarding our agency. 2) I do not know. 3) I believe so. 4) I am not sure of this.
13) Are you aware of communication in which the CDDO benefitted one CSP over another? If yes, please explain.	1	5	1	1) Stated in previous question.

14) Does the CDDO manage an effective process for persons to access your services? If not, please explain.	5	1	1	1) Timeframes are reported to be an issue by guardians.	
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	2	1	1) Case by case. 2) They may, however we have not requested the list. 3) I have never seen a list of this sort. 4) I have no idea.	
16) Does your CSPs grievance/dispute resolution process refer the person to the CDDO if the issue is unresolved? If not, please explain.	7	0	0	1) No comments.	
CDDO STAFF INTERVIEW		Y	N	N/A	COMMENTS
Rae Lynne Baker, Executive Director					
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"/>	No.	
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"/>	Have not cancelled or suspended an affiliate agreement.	
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"/>	A lot of feedback comes from the groups they have. The affiliate meeting is a place where providers can give feedback. Topics at affiliate meetings are varied, if they have feedback and share information at that meeting, the service; topic is more focused on information and needs information such as EF process. They get to share information on applying for EF processes. Always send invites out to stakeholder meetings. The advisory board has CSP representation. The at large council has representation from each of the providers. Providers have no problems calling with concerns. They have many opportunities to voice their opinion. Initially the mill levy process was all information that was set up and shared with providers that agreed on process and the commission approved it. The advisory board reviews every year; representation on advisory board is from providers.	
20) Does the CDDO maintain separation in CDDO/CSP functions? If so, how?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Independent CDDO.	

21) Do you explain the difference between the CDDO and CSP functions to families and consumers? If so, how?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	At eligibility time and sometimes choice, it is important to describe what the CDDO responsibility is and CSP responsibilities and how CDDO is gatekeeper, etc. Most people don't know about that and important to explain at the beginning. Help people understand and explain that.
22) Do all CSPs in your area serve anyone requesting services, regardless of severity of disability? If not, please explain	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes, they are expected to. We have some that can provide the services to the severely medically involved and other providers that don't have those individuals, but it is not something stated on choice. No one has any statement stating they won't serve a particular population.
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"/>	I like to think we do. Have a good choice process in place to provide information on providers and discuss that with consumers and assure they looked at all options in their process, help them understand what is available. Persons centered, Tamara goes through those and reviews them for a number of topics and also will catch certain things on occasion, typically involving behaviors. Independent case management is reviewed; the expectation to providers is to meet the regulation; get copies of those for the files. Rights/responsibilities we send out and providers also send those out. It is in affiliate agreement to review that with the individuals. That goes out with the mailing when the send out the tier score. Paid/delivered, address any issues that come forth. Report of ANE, have critical incident reporting system that is in place and try to follow-up on those. With the tool, it was created quite some time ago and based on old regulatory requirements. Working on improving f/u on ANE reports. They have f/u section on critical incident reporting. The only way they get information on ANE reports is if provider gives them that information; some have been good, others have not been so good. Created critical incident protocol to help improve this. Protocol now has them provide report on what they did. If there is a finding, Licensing staff gets involved. Have had a few substantiated lately. They require CAP for any substantiated report.
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"/>	The way we do that is anytime we are doing a choice options counseling we let them know of the process and how to access it. There is one at the agency, if you have a concern there we remind them they have that and if they are not happy with that they can come to the CDDO. It is written in rights/responsibilities form. It is in policies and procedures online. That is how it is addressed.
25) What does your CDDO do in terms of best practices, or something that may set you	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	I think that one of our strengths is that we are small. Therefore we know just about everybody in services. Our CDDO staff are familiar with most, see them out in the

<p>apart from other CDDOs across the state? What are your organizations greatest strengths?</p>				<p>community and are able to have a lot of interactions outside of the office. We are very accessible. Thought at first it would be intimidating being next to the jail/courthouse; not the case, people find it very accessible. Participated in pilot project for new tool, was a lot of work, but was very beneficial to us and the providers because they know what is coming down the road because some version of that tool is going to be implemented and wanted to know what to expect and be part of the feedback about that. I think our area has a variety of services to offer; providers are very varied; have a provider with 24r hour nursing, have people coming from other areas for that. We have another provider that has a great workshop and relationship with the school; print project and workshop that is doing great things. Another provider has most of their focuses on being out in the community; get people out working and doing creative things. There's a lot of variety in our area and sometimes why people move this way. We require transition meetings when someone moves from one area to another and ensure all information is received when a person moves from one area to another. Shared living is another area we consider a strength; two providers have that option, not a lot of other areas have that option.</p>
<p>26) In your opinion, what are some areas your CDDO could make improvements.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>There is always room for improvement. We have been working on our QA processes and working with Linda; getting better documentation of f/u and put a better process in place that when we f/u on things they are documented. The logging of critical events; looking at improving QA system/checklist with council. Part of the challenge is we do not have the QA position that we used to have; cut back on some things but it has not worked very well. It is hard to do that in an efficient manner, working on doing the f/u that is necessary. Would like to be able to work more on development on capacity types of things. Hope we can pursue things like Butler County with employment first; would like to see those types of things in our area.</p>
<p>27) What CDDO function do you find to be the most challenging?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Keeping up with all the changes. A lot of the expectations with the changes are hard to keep up with. Our contract has been extended, but rather than the contract being the bible, things have turned into policy so there are a lot of other things to keep up with. Make sure you are reading policy and keeping up with expectations; which is different than it was before. Not having a QA staff is challenging not being able to keep up with things.</p>
<p>28) What does your organization do in terms of strategic planning? Looking forward over</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Budget. As a county department we do an annual budget and let them know the plans and goals. One year the goal was to hope to hire a QA staff; was not able to be done.</p>

the next five years, what sort of goals may your organization be working towards?				Our constant vision is to work with individuals in a person centered manner and constantly improving doing what we are doing and working as a team. Long term, do not really have written down, but things we think and talk about. I think the Council over time have talked about different things they are interested in; working with Council and working with what they are interested in. With all the changes we have had the last several years we have been trying to keep up with learning how to manage those things. We do short term strategic planning.	
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"/>	That's a difficult one. Any of the data that we have is pretty cursory; how many eligibility, crisis requests, people moving in/out; we are pretty stable in numbers of people. Those are the types of things I report to the commission. Monthly advisory board meetings, let them know that information. Make sure we are on time with everything within the 7 days; Tamara is very good at meeting deadline. Those are measures of our success; getting all of our duties accomplished. Good working relationships with providers.	
BASIS ASSESSOR INTERVIEW		Y	N	N/A	COMMENTS
Tamra Watson, 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"/>	<p>Initial: get an email from Rae Lynn a copy of the letter she sent to parent/guardian telling they are eligible and need to set up BASIS. Either they or case manager calls and they set up BASIS. Usually do it in the office, but if have to go somewhere else they will do that. They try and do it to have the case manager present. Want case manager involved in as much as they can. Don't really have any required documentation with initial.</p> <p>Reassessment: BASIS packet is to be sent to CDDO two weeks before hand. They have a list of documentation they would like included with the packet, will review packet and call/email with any questions they have. Will review medication logs, behavior, seizures, all the plans and documents. Reviews medical records.</p> <p>Reassessments are scheduled a couple months ahead of time. Contacts provider contacts and set up a couple months ahead so they can get PCSP planned and done to her in a timely fashion. The 365 makes it harder to keep scheduling consistent. Does BASIS wherever is convenient for the individual and everyone else. They have a couple days to turn in information that was not received at assessment. PCSP and behavior plan both have to be current and provided 2 weeks prior to meeting. Reviews all plans, do all BASIS and comes back to enter in.</p>	

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"/>	Not always, but 99% of time they are. People have got sick in the last minute and they may be in hospital. Just last week had someone about to do BASIS, was having behaviors and went ahead and left assessment, but staff stayed behind. With the 365 they have to do it. Either goes before or after and gets eyes on the individual before the BASIS is entered. Also does options counseling so really needs to see them.
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"/>	Getting BASIS entered and making any changes to address/guardian they make the change.
4) What do you find to be the most challenging aspect of your position?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	365 days. Has really changed the way things are done. Another part would be that there has been so much change in management with providers so you can see a difference there in the leadership. Behavior documents are not consistent; no signatures/dates/name, not acceptable, adds work. We let the person in charge know what the issues are and let them know that it is not acceptable.
5) In your opinion, what improvements can be made to the assessor process?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	365 days. Go back to annual assessments, it was so much easier to plan and for providers. The new tool is going to take a lot of training. We were part of the pilot in August September and October. Staff had a hard time understanding a lot of the questions. The big complaint of assessment we are using now, people thought they were embarrassing etc., think the new one is going to be worse.
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"/>	Hasn't seen a lot of training out there. Went to 2016 Interhab conference. There have been some things on the internet, but there is really not much out there. In regards to BASIS the best help I have is to ask questions to other assessors and that is very helpful. Keep all those answers and questions in my book and refer to that.

Additional Information: KDADS received additional information from Cowley County CDDO Director, Rae Lynne Baker, on January 14, 2018 and January 24, 2018 regarding a recommendation that KDADS had made on the original Peer Review Report which had been issued to the CDDO on December 13, 2017. The information later provided to KDADS was not available on the date of the actual on-site peer review. After review of the subsequent information provided by the CDDO staff, KDADS removed the recommendation for Outcome 6 regarding State Aid and KDADS has subsequently changed this outcome to show the CDDO is in full compliance. This change to the report was made on January 29, 2018 and Cowley County CDDO was sent an updated copy of the Peer Review Report.