



January 10, 2018

CDDO Peer Review of DSNWK CDDO

Review Team:

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CDDO REVIEW REPORT SUMMARY OF FINDINGS

DSNWK CDDO
January 10, 2018

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 DSNWK Peer Review was held on January 10, 2018 beginning at 8:30a.m. Prior to January 10, 2018, DSNWK was last reviewed on August 29, 2012. Currently Janet Bolander serves as Director of DSNWK 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 well before the seven-day deadline.

2. Affiliation Information – The CDDO had thorough tracking of the affiliation process. The CDDO provided quarterly reports of affiliation information requests as well as affiliation applications and the status through the affiliation process. The CDDO also has a checklist with all paperwork due in the application process for each service type offered by potential affiliates as well as the timeline in which the paperwork needed to be turned in.

3. Annual dissemination of choices information: The CDDO has a well put together booklet that provides detailed information about the CDDO, rights, dispute resolution, service providers and the services they offer as well as additional resources. The CDDO also sends out personalized letters annually to individuals.

3. RECOMMENDATIONS FOR CDDO

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

Issue: The CDDO does not hold affiliate meetings. There are two affiliates that have no place on the COCM preventing them from having an avenue to provide input at the meetings as well as 10 affiliates that were given permission to opt out of participating.

Recommendation: KDADS recommends the CDDO provide additional opportunities for affiliates not participating in COCM meetings to provide input ensuring all affiliates are provided equal opportunity.

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

Issue: The CDDO and CSP share a P.O. Box as well as a shared email handle.

Recommendation: To ensure further separation of CDDO and CSP, KDADS recommends utilizing separate P.O. Boxes and email handles.

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

Issue: The CDDO currently has no specific formal policy/procedure in place regarding how they make decisions for distributing their state aid funding. The CDDO is utilizing a formula for distribution that was put in place in 1986.

Recommendation: KDADS would like the CDDO to consider developing written policy and procedure on how to determine fund distribution. The CDDO should also consider gaining affiliate feedback regarding ideas for spending funds.

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

Issue: There is a paragraph in the affiliation agreement that states a provider can give a 30 day notice when they decide to no longer provide services to an individual. The CDDO currently allows providers to opt out of being listed on the website and CDDO booklet. The CDDO also has one provider at capacity but this status is not indicated on the website or in the CDDO booklet.

Recommendation: The CDDO needs to review their affiliation agreement to ensure current language does not allow providers an opportunity to terminate services on an individual they are serving based on severity level or disability type. KDADS would like CDDO to consider listing all service providers, along with their referral status (open, closed), on their website and in the CDDO booklet as this would provide opportunity for individuals to be fully aware of potential opportunities currently or accessible in the future.

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

Issue: It does not appear the CDDO is monitoring affiliate's use of the AIR reporting system. There was no evidence available to show the CDDO provided follow up on any of the CIR/ANE reports. There was no tracking/trending of number of CIR reports obtained by the system or by the provider. The CDDO does have a formal CIR form, however it appears there are two different versions used. One form is used for DSNWK CSP and the other form is used by all outside CSPs.

Recommendation: CDDO needs to provide evidence to show tracking/trending and follow up on substantial critical incident reports through written documented evidence attached to the report. The CDDO needs to make their CIR form uniform for all affiliate providers.

6. Outcome 13: CDDO maintains an effective dispute resolution system that meets regulatory requirement. – Monitoring activity 13.

Issue: The CDDO policy on dispute resolution states all dispute resolution requests will be sent to the CDDO President. The CDDO President is a dual role position between DSNWK CDDO and DSNWK CSP. This current practice can be perceived as a conflict of interest if the President hears disputes from the CSP organization he oversees.

Recommendation: CDDO needs to amend their policy to indicate a dedicated CDDO position will hear all disputes or amend the current practice to address the conflict of interest when the DSNWK president hears disputes involving DSNWK CSP.

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: CDDO does not have a standalone policy to address eligibility training. There is one paragraph in the Single point of application and referral policy that addresses eligibility training requirements. The paragraph addresses that CDDO staff are required to participate in training offered by KDADS. The policy statement does not specifically identify topics that staff are required to be trained in, so the requirements for training are unclear. The CDDO has one staff member that conducts eligibility assessments. The CDDO produced a training record for their staff member from 2015-2017, however this staff member has been conducting Assessments for 17 years. The CDDO also produced minutes showing that the COCM had approved the policy that references eligibility training on February 6th, 2015.

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

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

Issue: CDDO had two policies, “Changing service providers” as well as “Informed choice/Options counseling”. Both policies state the CDDO is responsible for providing options counseling and providing information on service provider options when changing providers. During an interview with CDDO director, it was mentioned that CDDO often finds out clients change service providers without the CDDO’s knowledge or approval. CDDO director stated CDDO is more often not aware of provider changes versus being notified or proactively aware. The current practice for provider changes does not appear to ensure that an impartial CDDO staff member is completing this process. The current practice shows that TCM’s are being asked to facilitate some aspects of changing providers such as options counseling.

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

3. Outcome 8: Informed choice of community service providers.

Issue: KDADS reviewed a sample set of 7 clients. On the provider choice and options counseling forms reviewed in the sample, some forms had CDDO staff signatures provided. Many forms were signed on the CDDO staff line by TCMs or other community service providers. Other forms were left without a signature on the CDDO staff member line suggesting there was no participation by the CDDO as required by policy.

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

**4. Outcome 12: CDDO maintains a council of community members that meets the regulatory requirements-
Monitoring Activity 12a.**

Issue: The CDDO has a policy, “Council of Community Members”. It appears the CDDO has a formula for appointing members to the council, however the policy is very confusing and appears to have a potential for CSP members to have the majority over persons served/parents and guardians. Policy states each CSP shall develop a process for electing persons served or family members and there are many vacancies noted on the current list. The list indicates several providers have waived their right to serve on the council and 2 providers are not eligible to serve on the council. The CDDO indicated a check is done at the beginning of each meeting to ensure the appropriate quorum is present. While reviewing the minutes from the November 2017 meeting, it was discovered that 5 consumer/parent reps were present and 6 CSP reps were present. The CDDO did not have the appropriate quorum present, however business was conducted anyway. The COCM does have present term limits in place for consumer/parent members but does not have term limits currently in place for CSP members. The COCM currently have no bylaws in place.

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

5. 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.
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 DSNWK CDDO staff were 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.

Review Team Members:

- 1) Linda Young, PICS, KDADS
- 2) Colin Rork, PICS, KDADS
- 3) Joshua Gilbert, PICS, KDADS
- 4) Mieke Hoeffner, DPOK
- 5) Kendra Krier, OCCK
- 6) Susan Murray, OCCK

Date of Review: January 10, 2018

CDDO Name: DSNWK

CDDO Address: 2703 Hall St. Hays, KS 67601

Contact Person: Janet Bolander, Director

Phone Number: 785-625-5678

Email: janet_bolander@mysnwk.org

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

Scoring Compliance Key

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

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
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1.	CDDO ensures that its policies are distinct to the CDDO, and CDDO operated CSP policies are distinct to CSP. CDDO and CSP functions are governed by two distinct sets of policies.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The CDDO had distinct and clearly marked policies solely for the CDDO. The policies and procedures have clear titles including the K.A.R. as well as revision dates. The CDDO tracks the creation date, review date and revision date.	The CDDO has multiple policies that need updated with information regarding appeal rights. The CDDO also needs to review policies that reference outdated KDADS and state policy as well as missed steps in CIR reporting procedure. Recommendation: KDADS recommends the CDDO review policies for revisions and updates.
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 website appears to meet all minimum requirements. The website provides forms, applications, eligibility information and information on all provider types and services. There is a map of counties served where an individual can click to see all providers and services by county. The website outlines QA/QE, COCM, how to become an affiliate and individual's rights. The website is easy to navigate and provides very thorough information.	The policies and procedures are not available on the website and it appears some aspects of the website need to be updated. KDADS recommends the CDDO add policies and procedures to their website. Jerry Michaud is listed in multiple positions such as President, TCM and CSP provider. KDADS would like to see this updated to reflect appropriate contacts for these positions. KDADS recommends the CDDO develop a way to indicate service providers that are at capacity and not taking new individuals at that time. The CDDO has a policy that allows affiliates to opt out of being on the website. This is addressed in outcome #9. See outcome #9 for any recommendations or findings.

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"/>	CDDO has typically followed processes. They submitted policies with recent revisions that had not yet been approved by KDADS for this CDDO peer review. The CDDO has a procedure that outlines an alternate means to solicit public comment other than public hearing.	CDDO provided a copy of November 2017 COCM meeting minutes in which draft policies were supposed to be approved by the council. It was determined the appropriate Quorum ratio was not present at the meeting. Since the policies had not been submitted to KDADS for final review, feedback on policies will be provided on a separate document.

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"/>	KDADS reviewed all 29 affiliate agreements. Evidence shows CDDO maintains appropriate affiliate agreements with all affiliates. All agreements are current.	No concerns noted.
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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The CDDO has not canceled or suspended any affiliate agreements.	N/A

	an agreement would seriously jeopardize the CDDO's ability to fulfill its responsibilities.					
3b.	Did CDDO report BASIS information to KDADS in the agreed upon timeframe? (All functional assessments shall be entered into KAMIS within seven calendar days of completion of the assessment.) KDADS will sample completed assessments and dates to compare against KAMIS entries (5 days to initiate assessment from date of request, 30 days to complete assessment from date of request, 7 days to enter in to KAMIS).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	KDADS sampled 21 BASIS assessments that occurred in the last year. All samples were entered into KAMIS in agreed upon timeframe. All BASIS cover sheets indicated date of interview, location of assessment, scores from prior and current year, persons in attendance as well as date entered into KAMIS. The forms are also signed by the persons served/guardian, case manager and BASIS screener.	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 sampled 5 crisis/exception requests. All reviewed were approved and followed policy/procedure as outlined. CDDO policy has language to address individuals denied. The policy includes appeal rights.	No concerns noted.
3d.	Following a sample of eligibility determinations, do CDDO processes/procedures meet state guidelines? For example, was each person provided with "comprehensive options counseling?" Is the functional assessment/or reassessment occurring within the stated timeframe?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CDDO provided policy and procedures as well as the packet sent to individuals interested in applying for services. The CDDO packet includes a letter to the applicant that explains the process, an application for services, TCM choice form/waiver and the CDDO booklet. KDADS sampled 12 completed eligibility determinations. 6 were approved and 6 were denied. For the approved applicants, the CDDO provided supporting documents, an approval letter	Each person approved was provided with options counseling, however not all options forms were signed by CDDO staff. This issue is also addressed in outcome #8. See outcome #8 for any recommendation or finding.

					to the applicant, information to contact CDDO to schedule a BASIS assessment. BASIS assessments with cover sheets were provided and signed as well as receipt of options counseling. For the 6 denied applicants, the samples included letters indicating why they did not meet the criteria outlined in the DD reform act for services funded by the state. Enclosed with the denial letters was a list of additional resources as well as information stating the individual could request reconsideration of the determination by a third party within 30 days by submitting a written request to the CDDO.	
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 sampled 7 individuals, 2 transferred in and 5 transferred out of CDDO area. CDDO provided initial email that notifies the receiving CDDO of a transfer out of DSNWK's area and into another CDDO catchment area. The email provided contained the appropriate documents necessary to change CDDO catchment areas. All samples had completed transfer forms. CDDO ensures process and procedure meets 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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	KDADS reviewed all 29 affiliate agreements. All affiliate agreements were uniform for like services. CDDO uses one template affiliate agreement for all affiliates to ensure all agreements are	No concerns noted.

	CDDO. Affiliation agreement cannot extend advantages not offered to other CSPs.				uniform and do not extend any unfair advantage to any one affiliate. CDDO operated CSP does have an affiliate agreement on file. The affiliate agreement with CDDO operated CSP utilized the same Affiliate agreement language as all other affiliates ensuring no unfair advantage was extended to the CDDO operated CSP.	
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 meeting minutes from COCM meetings. In the minutes it was thoroughly outlined where affiliates are afforded time to provide input. CDDO also sends out satisfaction surveys that allow affiliates to provide feedback for the CDDO and inform of any topic they wish to discuss at an upcoming meeting. A survey was sent to all affiliates with 12 responding. The responses and comments were all positive, providing evidence that affiliates feel they have ample opportunity to give input.	The CDDO does not hold affiliate meetings. There are two affiliates that have no place on the COCM preventing them from having an avenue to provide input. The CDDO allows affiliates to opt out of participating in the COCM meetings. There are currently 10 providers opting out of COCM participation. KDADS recommends additional opportunities for CSP's not participating in COCM meetings to provide input. KDADS would like to ensure all affiliates are afforded equal opportunity to provide input to the CDDO.
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"/>	DSNWK President, Director of Admin Services and Administrative Assistant are dual role positions between DSNWK CDDO and CSP. CDDO provided position descriptions for all dual role positions. Position descriptions were reviewed and very clearly distinguished all duties for CDDO and separate duties for CSP.	No concerns noted.

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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The CDDO and CSP have offices in the same building, however they are in separate suites. CDDO and CSP have separate entrances that are clearly marked as CDDO or CSP. The CDDO and CSP each have separate websites. The CSP website does have a link to the CDDO website, however the CDDO website does not have a link to the CSP site. The CDDO and CSP each house mailing lists in different software programs. The CDDO and CSP each have separate letterhead, business cards, phone and fax numbers. Though CDDO and CSP have a shared PO box, DSNWK CDDO has an administrative support service agreement in place with CSP to provide administrative support such as mail distribution, accounting services, technology services, Human resources, completion of reporting services and other incidental CDDO expenses. Through the service agreement a CSP administrative assistant distributes both CDDO and CSP mail accordingly. The CDDO and CSP each have different mail stations to ensure separation of mail during distribution.	The CDDO and CSP share a PO box as well as a shared email handle. To ensure further separation of CDDO and CSP, KDADS recommends utilizing separate PO Boxes and email handles.
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Outcome #4

K.A.R. 30-64-22 - Unbiased affiliation process						
#		1	2	7	Strengths & Comments	Findings & Recommendations

4.	CDDO must have written policies/procedures that are approved in accordance with Article 64 requirements that clearly address the CSP affiliation process, and states the affiliation requirements. Evidence of a policy/procedure and it is followed.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CDDO has a very detailed policy written that outlines the requirements and process for becoming an affiliate. CDDO provided a checklist outlining all paperwork required for affiliation for each type of service offered. The checklist also outlined the timeframes for when the paperwork is due.	No concerns noted.
4a.	CDDO must maintain documentation that identifies the current status of all individuals/entities/applicants requesting affiliation, including notification of appeal/grievance rights. Evidence of a process for affiliation and its monitoring.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CDDO provided a form titled “DSNWK CDDO affiliation agreement activity.” The form tracks all inquiries for affiliation, applications received, application status and all approvals/denials. This report is a quarterly report. The policy on affiliation also outlines appeals and grievance rights.	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 policy and procedures ensure all CSP options are shared.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CDDO has policy/procedure written regarding informed choice/options counseling. The policy outlines all instances where information regarding all service options are offered. CDDO provided a TCM choice form showing all TCM’s are offered. TCM choice form includes a waiver of services as an option.	No concerns noted.

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
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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 provided their quarterly reports on IDD state aid funding. After reviewing the reports the CDDO is primarily distributing the funds to two agencies. Their distribution funding formula has not been changed since 1986. The majority of the funds is distributed to DSNWK CSP and a small portion is given to the Hays Area Children Center for their infant toddler program. CDDO had no specific written policy or procedures in place for determining funds distribution.	KDADS would like the CDDO to consider developing written policy or procedure about how to determine funds distribution. The CDDO should also consider gaining affiliate feedback regarding ideas for spending funds. Gaining affiliate feedback is a good avenue and can be used as a way to further gain input into CDDO operations.
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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"/>	CDDO does not have a standalone policy to address eligibility training. There is one paragraph in the Single point of application and referral policy that addresses eligibility training requirements. The paragraph addresses that CDDO staff are required to participate in training offered by KDADS. The policy statement does not specifically identify topics that staff are required to be trained in, so the requirements for training are unclear. The CDDO has one staff member that conducts eligibility assessments. The CDDO produced a training record for their staff member from 2015-2017, however this staff member has been	The CDDO needs to develop a standalone policy on Eligibility training or enhance the current Single point of Application policy that references Eligibility training to reflect more specific training requirements as KDADS has more recently not offered routine training in eligibility. The specific training requirements listed in K.A.R. 30-64-22, are not listed in the current CDDO policy. Current training record provided did not indicate when the staff member had been trained on the types of community services available in the service area and information concerning the licensed providers and

					conducting Assessments for 17 years. The CDDO also produced minutes showing that the COCM had approved the policy that references eligibility training on February 6 th 2015.	other agencies offering those services, Potential referral contacts for persons who are determined not to be eligible for services. The current policy statement also does not address any ongoing training requirements. KDADS will be issuing a finding on this item. KDADS would like to see the CDDO develop a plan with timeliness 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	CDDO had two policies, Changing service providers as well as Informed choice/Options counseling. Both policies state the CDDO is responsible for providing options counseling and providing information on service provider options when changing providers. During an interview with CDDO director, it was mentioned that CDDO often finds out clients change service providers without the CDDO's knowledge or approval. CDDO director stated CDDO is more often not aware of provider changes in the field. The current practice for provider changes does not appear to ensure that an impartial CDDO staff member is completing this process. The current practice shows that TCM's are being asked to facilitate some aspects of changing providers such as options counseling.	The CDDO does not seem to have an effective process in place to monitor clients changing service providers. KDADS would expect the CDDO to have an appropriate monitoring system in place to facilitate and oversee the transfer of clients between service providers prior to the transfer taking place. There are also concerns that TCMs and/or other local service providers (such as RNs) are being asked to provide options counseling or sign the form in place of the CDDO staff member which could be seen as a conflict of interest.

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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	KDADS reviewed a sample set of 7 clients. On the provider choice and options counseling forms reviewed in the sample, some forms had CDDO staff signatures provided. Many forms were signed on the CDDO staff line by TCMs or other community service providers. Other forms were left without a signature on the CDDO staff member line suggesting there was no participation by the CDDO as required by policy.	The CDDO needs to develop a procedure to better document who from the CDDO is involved in provider changes when they occur. The CDDO should not have CSP representatives signing in place of a CDDO staff.

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 a policy, Uniform access to and exit from services, which states that affiliates can specialize, but cannot do so based on the level or severity of an individual's disability. The specific language was also found in the current affiliation agreement. There is a paragraph in the affiliation agreement that states a provider can give a 30 day notice when they decide to no longer provide services to an individual. The CDDO currently has one provider that is capped for Day and residential services per the provider's request. The CDDO currently does not indicate on their website or in their CDDO	The CDDO needs to review their affiliation agreement to ensure that the current language does not allow providers an opportunity to terminate services of an individual they are serving based on severity level or disability. KDADS would like CDDO to consider listing all service providers on their website and CDDO booklet. The current practice of allowing providers the option not to be listed does not provide an opportunity for individuals to be fully aware of opportunities in their service area currently or accessible in the future.

					booklet whether or not a provider is currently capped for services. The CDDO gives providers the option to be removed from the website or booklet if a provider requests to be removed.	
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"/>	The 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.	N/A

Outcome #10

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

#		1	2	7	Strengths & Comments	Findings & Recommendations
10.	QA process addresses the required regulatory requirements including: Choice, Person-Centered, Rights & Responsibilities, Paid/Delivered, Third Party payment responsibility and ANE reporting information?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The CDDO has 4 policies covering Critical incident reporting, On-site monitoring, QA/QE Committee and team as well as Quality Assurance. The COCM serves as the CDDO QA committee. The CDDO has a 5 person sub-committee, that has a CDDO representative on the team, that provides onsite monitoring of affiliates. The CDDO pays a stipend to the QA onsite monitoring committee to complete onsite assessments. The CDDO has an onsite monitoring tool developed that the sub-committee uses. The CDDO	CDDO needs to provide evidence to show tracking/trending and follow up on substantial critical incident reports through written documented evidence attached to the report. The CDDO needs to make their CIR report form uniform for all affiliate providers.

				<p>has a dedicated staff member that oversees the QA process. The CDDO provided one years' worth of QA meeting minutes. It was evident from the review that the committee is reviewing the results of onsite monitoring and there is a process in place to track corrections as evident by a spreadsheet the CDDO provided. The CDDO also has in place a system to monitor each and every affiliate in their network. The CDDO has a monitoring system that tracks and trends results of onsite reviews through two reports. One report tracks the overall process for the current year and the second reports trends the ratings of an affiliate over a three year period. Once the QA team identifies a correction needed a letter is generated and sent out. The CDDO does have a formal critical incident report form. However, it appears there are two different forms used. One form is used specifically by DSNWK CSP and the other is used by all other outside CSPs. The form used by outside CSPs informs the person making the report on where to send the report to. The form used by DSNWK CSP does not have this information. CDDO director was asked why both forms did not match, CDDO director informed DSNWK CSP already knows where to send the forms and does not need it listed on the form. It does not appear the CDDO is monitoring</p>	
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					<p>affiliate's use of the AIR reporting system. There is no specific box on the CIR form to indicate whether or not an AIR report or DCF report has been made. KDADS reviewed two months of CIR reports onsite. There was no evidence available to show that the CDDO provided follow up on any of the CIR reports. There was no tracking/trending of number of CIR reports obtained by the system or by the provider. There was no specific written evidence to show the CDDO provided any follow up on ANE reports. The CDDO did indicate they have an outside entity (CPA) that is required to look at paid/delivered services for each affiliate. The CDDO indicates they do not routinely meet with their QMS licensing staff, however they do state they have periodic communication with QMS.</p>	
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"/>	<p>The CDDO provided evidence that they are providing some follow up on their onsite review process. This appears to be uniform for all affiliates reviewed by QA. The CDDO listed they have issued no formal corrective action plans.</p>	No corrective action plans to review.

Outcome #11

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

#		1	2	7	Strengths & Comments	Findings & Recommendations
11.	Is CDDO informing person/family/guardian of available community services choices and types in or near the person's home annually?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	KDADS reviewed 15 sample files. The CDDO sent out personalized letters. All appropriate information required was sent out and this was done in a timely manner.	No concerns noted.
11a	Does CDDO have documentation of ICF/IID requests?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	KDADS reviewed 2 sample files. 1 file was approved for admission and 1 was denied. All information concerning this gatekeeping process was found in the files.	No concerns noted.

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"/>	The CDDO provided KDADS with a list of COCM members.	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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The CDDO has a policy, "Council of Community Members". It appears the CDDO has a formula for appointing members to the council, however the policy is very confusing and appears to have a potential for CSP members to have the majority over persons served/parents and guardians. Policy states each CSP shall develop a process for electing persons served or family members. The CDDO provided a list of council members to KDADS. There are many vacancies noted on the current list. The list indicates several providers have waived their right to serve on the council and 2 providers are not eligible to serve on the council. The CDDO indicated a check is done at the	CDDO must ensure term limits for all serving members on the COCM. CDDO needs to ensure COCM bylaws are developed and put in place. CDDO needs to review current policy and ensure CSP vacancies on the COCM are filled in a timely manner to ensure a more diverse representation at meetings.

					beginning of each meeting to ensure the appropriate quorum is present. While reviewing the minutes from the November 2017 meeting, it was discovered that 5 consumer/parent reps were present and 6 CSP reps were present. The CDDO did not have the appropriate quorum present however business was conducted as if an appropriate quorum was present. The COCM does have present term limits in place for consumer/parent members but does not have term limits currently in place for CSP members. The COCM currently have no bylaws in place.	
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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 policy on Dispute resolution. The policy stated all dispute resolution requests will be sent to the CDDO president. The CDDO President is a dual role position between DSNWK CDDO and DSNWK CSP (Shared 50/50).	The CDDO policy indicates that all disputes are sent to the CDDO president who is a shared position. This current practice could be perceived as a conflict of interest if the President hears disputes from the CSP organization he oversees. The CDDO needs to amend their policy to indicate that a dedicated CDDO position will hear all disputes or amend the current practice to address the conflict of interest when the DSNWK President hears disputes involving DSNWK CSP.
13a	CDDO will maintain evidence that the dispute resolution process is made available to all persons requesting it	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The CDDO distributes their dispute resolution process information annually to all individuals and guardians at the time of	No concerns noted.

	and to any persons whom a negative action has been initiated.				BASIS assessment. This information is also in the CDDO booklet.	
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"/>	1 incident rose to the level of formal dispute. This information was reviewed and it was apparent that the dispute resolution process was followed and the issue was resolved.	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"/>	Only one dispute resolution was submitted in 2017. Not enough information for trending.	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	
9 total respondents						
1) Did you understand the eligibility application process? If not, please explain	9	0	0		1. Everyone has been helpful. 2. The CDDO was helpful with any questions. 3. Did not understand the process at first, but the CDDO helped throughout.	
2) Do you believe the eligibility determination process is understandable and timely? If not, please explain.	9	0	0		1. Understandable yes, but timely no. Understandable though with manning issues. 2. about 6 weeks. 3. Got back pretty quick. Within 2 to 3 weeks. 4. Everything was timely.	
3) Do you believe the service referral process (including options counseling) was timely? If not, please explain.	8	0	1		1. Very nice information. Services very limited in Northwest Kansas area.	
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.	8	0	1		1. Very understandable process. 2. Yes, provided with booklet. 3. Not sure, probably included with all the paperwork.	
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?	4	0	5		1. Got TCM right now. 2. Did receive information but not yet receiving services. 3. We like their handbook, very informative.	

6) If currently receiving services, have you every changed service providers? If so, how did you receive information about all your service options?	3	0	6	1. Never changed, don't want to change. Very happy with current provider.
7) If currently receiving services, do you know who to contact if you want to change service providers? If so, who?	4	0	5	1. CDDO. 2. CDDO.
8) Do you have any other information regarding your interactions with the CDDO that you would like for us to consider?	6	3	0	1. So many pieces of paper to complete. Parents almost need an advocate to help them through the process. 2. wish the state would help out with funding and budget to assist the CDDO better. 3. DSNWK was great getting started and eligible. 3 weeks. Funding is limited and on IDD waiver so may have to wait 7 years. Getting service through school. 4. excellent customer service. Timely and very nice. Services in NW Kansa are limited and there needs to be a way to get more services in the rural areas. 5. Staff was very knowledgeable and very friendly. Cynthia works at Larned Hospital and is not a guardian but assists with applications through DSNWK. 6. All interactions have been good.
COMMUNITY SERVICE PROVIDER INTERVIEW 12 total respondents	Y	N	N/A	COMMENTS
9) Does the CDDO have an effective process for completing the annual BASIS assessment? If no, please explain?	11	1	0	1. There are sometimes technology problems since the screeners don't travel to the locations. Otherwise it is a relatively smooth process. 2. All I have attended have been very helpful. They visit with all who attend and also have the ability to do interviews via computer. 3. BASIS screeners make contact with CSP, TCM and guardians to schedule BASIS. 4. The Basis screener is not allowed to come to the individual's home or to the center that they are at. The screeners are not allowed to complete the BASIS.
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	10	0	2	1. All information is shared at affiliate meetings. CDDO solicits input on procedures, etc. from affiliates. 2. I am invited to their meetings

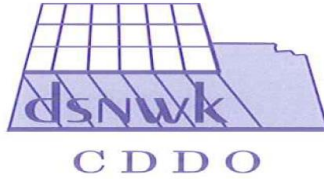
they represent your area? If not, please explain.				
11) Does the CDDO share information about your CSP with persons seeking services?	10	0	2	<ol style="list-style-type: none"> 1. Listed on CSP information 2. Written information is given to persons seeking services. 3. I believe they are open about all their providers and who can serve them.
12) Does the CDDOs literature demonstrate impartiality regarding the CSPs in your area?	10	0	2	<ol style="list-style-type: none"> 1. I do not know if they do or not.
13) Are you aware of communication in which the CDDO benefitted one CSP over another? If yes, please explain.	0	10	2	<ol style="list-style-type: none"> 1. I've never witnessed the CDDO favoring any CSP over another. They do a good job of remaining neutral.
14) Does the CDDO manage an effective process for persons to access your services? If not, please explain.	9	1	2	<ol style="list-style-type: none"> 1. When someone wants case management services from us we are informed immediately so that we can contact the individual/family. 2. I am not sure. I'm sure they would allow them to call and ask questions if there was a concern or question. 3. Do not know the procedure that the CDDO uses when a new person is requesting services on how they educate the person on the different services that are available in their area.
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?	7	3	2	<ol style="list-style-type: none"> 1. Do not know if they have a list of names of persons interested in services. 2. Don't know. 3. Not wanted. 4. I have never received anything like that. 5. I'm unaware of any such list of names. I work in case management though. We don't have a waiting list so everyone who is eligible for services gets case management immediately. 6. Have never asked for a list – reason for no answer.
16) Does your CSPs grievance/dispute resolution process refer the person to the CDDO if the issue is unresolved? If not, please explain.	10	0	2	<ol style="list-style-type: none"> 7. I believe so.
CDDO STAFF INTERVIEW Janet Bolander, Administrator	Y	N	N/A	COMMENTS

17) Has the CDDO refused to affiliate with a provider? If so, was the appropriate regulatory criteria applied?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Previous review in 2012 they had a policy that was driven by choice. Since then, if there is a request, they walk through process; have expectations to meet minimum criteria.
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 had a couple w/ compliance issues, but have not reached the level of suspending any agreements. They are currently helping people along that have issues to help correct things.
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"/>	<p>Main communication is through email; policies are reviewed yearly at COCM meetings to vote. Once they are approved by council, they send them out to the affiliates. Anything they receive from KDADS we send it out to the affiliate network through email as soon as they receive information.</p> <p>Want to provide greater opportunity for affiliates to have a separate meeting; CDDO is conducting them had a few affiliates involved, but after a couple they stopped going. Now on agenda items at COCM meetings give all affiliates opportunity for input into the system.</p>
20) Does the CDDO maintain separation in CDDO/CSP functions? If so, how?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Absolutely. Janet heads the CDDO operations and aspects are separate from the CSP's. Accounting, HR, IT are shared. Janet is keeper of CDDO records and will loop Jerry in and that is how that is managed. They have a google drive where CDDO related information/communication/documentation is at. There is no way for CSP staff to have access to CDDO information. There are safeguards surrounding their electronic information.</p> <p>Receptionist has agreement for shared duties w/ CSP/CDDO; this person picks up the mail from the PO Box and distributes it; distribute CDDO mail back to Janet and their area. All mail received and delivered by this person is sealed mail.</p>
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"/>	When talking to applicants we explain the difference; let them know what the CDDO is and that they work w/ all the providers in NW KS. They let them know that DSNWK is the choice of one provider and explain that there are other providers and send them the packet of information with all the providers listed. The handbook explains what the CDDO is and their functions.
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, we have non-discrimination as part of affiliation agreement.

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"/>	The QA system in our region is a difficult challenge. We structured the team and they interfaced with the COCM which is quality assurance committee. There is a ton of information on there, breaks out KAR standards. Provides 14 performance indicators tied to quality, safety and health. There are ANE reporting components, etc. it is a very encompassing document. The QA process does multiple things; surveying staff, guardians and people served asking questions regarding all of that. There is onsite monitoring that follows every review; sometimes that is for cause in event of a concern. Paid/Delivered is part of agreed upon procedures to have an outside entity to ensure services are paid/delivered.
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"/>	Dispute resolution policy is part of options counseling and is in the booklet. We also provide appeal rights for every negative decision and spell that out. The policy itself goes to everyone at the time of BASIS. Whether or not affiliate is participating at meeting, it is provided from COCM meeting.
25) What does your CDDO do in terms of best practices, or something that may set you apart from other CDDOs across the state? What are your organizations greatest strengths?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	I would say that our QA process is one that; out of necessity was created and we accomplished the goal. They have a service area 17,000 miles square and have a team to do the legwork to have that accomplished; set up a contract and set up a pay system for folks to do that. We put it into effect in 1998 and have improved our processes throughout that time. Anytime you have a large geographic region we have had to get creative in how to meet peoples needs as close to home as possible. Use of electronics have helped them out a lot; email, video conferencing, etc.
26) In your opinion, what are some areas your CDDO could make improvements.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	One of our goals is to have affiliates only website so all policies and forms are on that site. They want to update the website. Level of participation is an area they would like to improve; however, it is a challenge; have tried making that available to ‘shorten the distance’; make things easier through electronic means etc.
27) What CDDO function do you find to be the most challenging?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Probably the most frustration is getting ISPs from MCOs. Makes it hard to keep track of what services people get/need. Some MCO care coordinators are good about it, but others are not. We have some that we have no ISPs for.
28) What does your organization do in terms of strategic planning? Looking forward over the next five years, what sort of goals may your organization be working towards?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Difficult to plan ahead with all the changes; very challenging to know what the system will look like in a year/5 years. Look forward to greater stability in overall system. Interfacing w/ a managed care model that is frustrating on every level. There are quarterly reports submitted to the board consisting of objectives. One of the goals is to

				increase information sharing between CDDO and affiliates; streamlining the affiliation process; being responsive to input from affiliates; how to improve QA/QE review process.
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"/>	<p>We keep track of BASIS dates; keep track of deadlines, etc. Some of the things we track is the waiting list, people coming in, people leaving, why are they coming/going. The board gets the quarterly report and then it is sent to the affiliates.</p> <p>Measuring success is timeliness; track crisis and responses, eligibility determinations. Ultimately, we want to look at quality outcomes and continue to see that people continue to have their needs met. Hear in the survey process from guardians, persons served, etc. that good things are happening.</p>
BASIS ASSESSOR INTERVIEW			Y N N/A	COMMENTS
Eileen Anderson and Cheryl Morgan, Basis Assessors				
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>Timeline between the two are very similar. Get notification and set it up as soon as possible. Usually w/in 30 days it is finished. From the time they complete the assessment it is entered into KAMIS w/in 7 days. Depends on how quickly people get back to me how long it takes to get scheduled. They have a sheet that is printed out, put cover sheet on that and put contact times in there to track when people were contacted; if multiple requests they send certified letter. Providers have until 2 days after BASIS to have everything in; most have everything in prior to the BASIS. Sometimes/every once in a while it will take extra to get behavior data from schools etc.; however, usually have everything in by 2 days following the assessment.</p> <p>The location is whatever is easiest for the individual. Do them at home, school, nursing home, wherever convenient for the individual. Case Managers have MiFi's so they can pick up internet and do Google video conference.</p> <p>There are people that come into the office and have assessments done. They could go out to people's place; but everyone is pretty computer savvy and like doing the assessments for the video.</p>

2) Is the consumer always present for their BASIS assessment? If not, please explain why.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	99% yes; when it is not it is usually due to behaviors and they elect not to bring them; other times is parents of children that do not want them to sit in; they will come in and say hi but walk out the door. One guy was at grandma's house and CM went after the BASIS and get eyes on, was a pleasant experience. Regardless, they lay eyes on the individuals prior to submitting.
3) Does the CDDO report BASIS information to KDADS in the agreed upon timeframe? If not, please explain.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes; only problem ever had is when request a share, but other than that we get it in the requested time frame. BASIS assessor does all the entering of information.
4) What do you find to be the most challenging aspect of your position?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Honestly, printing out KAMIS things; can't go online and print all at once, have to print page by page by page. (KAMIS does not allow "print" section to work) so that is why they have to print out page by page.
5) In your opinion, what improvements can be made to the assessor process?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Fix KAMIS printing option. Would like to see some more in-depth questions, but MFEI is addressing those. They are part of the pilot program; there are complaints of the length, but people like the assessment and addresses any BASIS issues.
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"/>	We have monthly meetings going over certain aspects of BASIS to ensure everyone is on the same page. If Janet goes to training somewhere else she trains us when she gets back. No more state-roundtables, would like to have that come back.



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February 6, 2018

Josh Gilbert
Program Integrity Compliance Specialist
Community Services and Programs Commission
Kansas Department for Aging and Disability Services
2250 E. 22nd St.
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RE: Rebuttal for DSNWK CDDO Peer Review 01/10/2018

This letter is in response to the DSNWK CDDO Peer Review report dated January 10, 2018. We appreciate the effort made by the CDDO Review Team, however, DSNWK CDDO would like to provide a rebuttal to finding number 1 and finding number 4.

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

Issue: The CDDO has one staff member that conducts eligibility assessments. The CDDO produced a training record for their staff member from 2015-2017, however this staff member has been conducting Assessments for 17 years.

Rebuttal: The review process asked for training-information pertaining to the last year, and DSNWK CDDO provided only one year information. The training record of the assessor, however, includes far more. Most if not all of the ongoing training opportunities were attended as provided through KDADS, via the Round-table discussions (the training provided to all system administrators/assessors. The CDDO has records of these training for the past 17 years and can produce it for the review team.

Finding number 4. Outcome 12: CDDO maintains a council of community members (COCM) that meets the regulatory requirements Monitoring Activity 12a.

Issue #1: The COCM does have present term limits in place for consumer/parent members but does not have term limits currently in place for CSP members.

Rebuttal: 30-64-31 (a) 7b. "...Those bylaws or procedures shall stipulate a process by which consumer, family member, or guardian council members are chosen in an election by consumers, family members, and guardians following nominations by individuals residing in the service area". DSNWK CDDO appreciates and agrees with the finding that it does have term limits for these groups (consumers, family member, or guardian council members). Contrary to the finding, DSNWK CDDO believes that fully licensed and affiliated community service providers are standing members of the COCM and not subject to elections. The KAR 30-64-31 continues describing the election process, noting this process is to be captured in bylaws or procedures. The regulation, cites only the election of the specified group noted above (consumers, family member, or guardian council members) and are absent the referenced community service providers. We believe this is evidence of provider standing as members of the Council, qualified by the fact that they are a current licensed/affiliated provider in the CDDO. Each provider, as a provider, appoints the specific individual(s) to serve to represent them as provider on the Council. In addition, several providers do not have more than one administrative personnel to rotate in/out of the council to comply with such an implied term limit.

Issue #2: The COCM currently have no bylaws in place.

Rebuttal: There are two references to 'bylaws' in KAR 30-64-31. In both of these references it reads "Those bylaws or procedures..." agreed to and adopted by the council. DSNWK has written procedures in Policy 1.A.01 Council of Community Members (K.A.R. 30-64-31). Bylaws as a separate document to this policy are not required as indicated in the peer review report.

Thank you for considering this response and rebuttal. Please, should you have any questions regarding the points above, reach out to us. Thank you again for your efforts and considerations.

Best Regards,



Janet Bolander,
DSNWK CDDO Administrator

cc: Gerard L. Michaud
CDDO File

Janet,

KDADS is responding to the recent rebuttal you submitted on February 6, 2018 regarding your CDDO Peer Review and the findings issued on Outcome #7 and Outcome #12.

In your rebuttal of Outcome #7 you stated you had originally provided the most recent 12 months of training as that is what the peer review preparation guide stated was necessary. KDADS acknowledges that you produced training records dating back 17 years showing you have completed necessary trainings required by KAR 30-64-23. We will note your rebuttal comments in your CDDO Peer Review report as well as KDADS response to those comments.

In your rebuttal of Outcome #12, your first concern is with the term limits of council members. You reference KAR 30-64-31 (a) 7b, stating the regulation cites only Consumers, Family Members or Guardian council members for the election process. You further state the regulation is absent the process for community service providers.

KAR 30-64-31 states as follows. A Council of Community Members shall meet these Criteria:

- 1) Consist of a selected number of individuals, a Majority of Whom shall be made up of representatives from each of the following two categories:
 - A) Persons with developmental disability
 - B) Family members or guardians of a person with developmental disability
- 2) Include representatives from the following:
 - A) The CDDO
 - B) Affiliates
- 3) Not have served more than two consecutive three year terms as members of the council.

KDADS is interpreting 30-64-31 to mean that the affiliates are subject to 2 (3) year term limits, as per (3). As a result, the finding will stand.

In your rebuttal of Outcome #12, your second concern is with the development of bylaws for the council. You brought to my attention that KAR 30-64-31 references “Bylaws or Procedures” in multiple locations. This shows that the regulation does not require the development of bylaws if procedures for the council are developed within CDDO policy. KDADS acknowledges DSNWK has procedures referenced in policy 1.A.01 and this portion of the finding will be moved to recommendation as separate bylaws to direct the council is best practice. We will note your rebuttal comments in your CDDO Peer Review report as well as KDADS response to those comments.

If you have any further questions or concerns please feel free to contact me.

Josh Gilbert

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