



August 22, 2017

CDDO Peer Review of Hetlinger CDDO

Review Team:

Colin Rork, KDADS

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CDDO REVIEW REPORT SUMMARY OF FINDINGS

Hetlinger CDDO Peer Review

August 22, 2017

1. GENERAL COMMENTS

Hetlinger CDDO's Peer Review was held on Tuesday, August 22, 2017 at 9:00 a.m. Prior to August 22nd, Hetlinger CDDO's last Peer Review was March 12, 2013. Sara Pearson is Director of CDDO Administration for Hetlinger CDDO and was the primary point of contact for KDADS throughout the review process. All information requested prior to review and onsite were received. The review team would like to thank the CDDO for their preparation, organization and availability throughout the process.

2. IDENTIFIED STRENGTHS

1. **BASIS** – KDADS requested a random sample of 14 individuals who had BASIS assessments within the last year. All of the sampled assessments were entered within the agreed upon timeframe, if not prior to. Through on-site interview with the BASIS assessor and a review of assessments, it is evident the CDDO has a good process in place to ensure assessments are completed accurately and entered into KAMIS timely.
2. **Affiliate Involvement** – TCM/Affiliate meeting minutes show that the CDDO does a great job working with affiliates, discussing current issues/concerns, and informing of changes at CDDO and State level. Meeting minute notes are very detailed and helpful for those who either did not attend, or to those who would like to reflect on past meetings. Review of notes also showed evidence of tracking and follow-up with ongoing concerns. Evidence shows a great process to solicit input, provide updates and discuss room for improvement. Continued improvement of this process will be helpful for all involved.
3. **Consumer/Family/Guardian Engagement** – Through consumer/guardian interviews it is evident that the CDDO is very helpful, accommodating and easily engaged throughout the process. Quality Enhancement and Quality Assurance policy and procedures help the CDDO ensure positive experiences for those being served in their area.

4. **Position Descriptions** – The CDDO has several individuals who work for both the CSP and the CDDO. All position descriptions are very thorough in separating out how much work is dedicated to CSP and how much for the CDDO. For any CDDO who has individuals also working for the CSP, Hetlinger could provide a great example of how these position descriptions could be detailed.

3. RECOMMENDATIONS FOR CDDO

1. **Outcome 3: CDDO completes all management responsibilities as required – Monitoring activity 3d.**
Issue: CDDO does not provide documentation for consumers who are determined eligible, but decline services. Eligible consumers were sent letter including choice form, as well as a second request to have information returned. Still, the CDDO is not having much success with follow-up and more often than not, choice forms are not being returned.
Recommendation: Include a space on the choice form for those who decline services indicating that is their choice and a signature to confirm/document this decision. Additional documentation is recommended to provide evidence that the individual was offered options, is not interested, has checked box and signed indicating they are declining services. Additional outreach to consumers who have been determined eligible to ensure approved services are provided in a timely manner is also recommended. CDDO mentioned that they do send out a second letter, however, if those are not returned there are no additional attempts. Process meets state guidelines, however additional follow-up and education could be provided to ensure those approved for services understand the process and do not miss out on the opportunity to make a choice.
2. **Outcome 6: Access to HCBS & Day/Res State Aid funding is not dependent on the person's chosen service provider – Monitoring activity 6.**
Issue: There is evidence that information on state aid allocation can be received upon request, but there is no formal policy and procedure in place regarding state aid.
Recommendation: Create a formal policy and procedure for accessing state aid funds. Make the CDDO's State Aid Policy available for those interested in what state aid is, what it is used for, and how it can be accessed.

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

Issue: The CDDO does maintain a locally developed impartial QA process that reasonably addresses regulatory requirement and the outcome is met. However, some additional on-site visits from the CDDO would be beneficial.

Recommendation: The CDDO should conduct additional onsite visits to their providers, outside of the QA process. It was mentioned during CDDO Director interview portion of the Peer Review that the Director would like to increase the amount of informal visits from the CDDO to ensure consumer satisfaction and provider compliance. These additional visits will help maintain and improve relationships with both those who are served and for those providing services.

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

Issue: There was some discrepancy on the signature page with the meeting minutes. Some consumer/family member/guardians were marking CSP instead of the indicator that they are a person served, family member, and/or guardian. It appeared that council composition was not as outlined in policy and procedure and Article 64.

Recommendation: Ensure CDDO signature page is completed accurately to show membership meets regulatory requirements. Review showed composition was obviously in compliance, however, ensuring documentation on signature page is correct will prevent any confusion in regards to member composition.

4. FINDINGS

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

Issue: The CDDO shares phone, fax, email handles, mail/PO Box, and does not have separate signage from the CSP. When searching for information on Hetlinger CDDO on the internet, you are directed to Hetlinger CSPs website, which provides basic contact information for the CDDO.

Recommendation: Create a plan to ensure further separation between the CDDO and the CSP. Would also recommend that the CDDO create a separate website from the CSP for individuals searching the internet for CDDO information. CDDO contact information is currently listed on CSP website and is the only place Hetlinger CDDO information is listed on the internet. By creating a standalone CDDO website, individuals will be able to receive impartial information on all affiliates. Contract language states that if a CDDO has a website or develops a website after July 1, 2009, it will ensure that access to its CSP component information (if applicable) is available to the same extent and manner as to all other CSPs in the CDDO's area. The website at a minimum will contain information regarding a list of all Affiliates in the area, the CDDO's policy(ies), and the CDDO's forms.

2. **Outcome 4: Unbiased Affiliation Requirements – Monitoring Activity 4.**

Issue: The CDDO does not have a formal policy and procedure in place with Article 64 requirements that clearly address the CSP affiliation process, and states the affiliation requirements. There is evidence of a detailed process and handbook provided to interested affiliates, but no formal policy/procedure.

Recommendation: Create a formal policy and procedure outlining affiliation requirements.

6. BEST PRACTICE RECOMMENDATIONS:

1. A CDDO newsletter is recommended for best practice. Newsletters are a good way for the CDDO to stay in touch with individuals (especially those who are waiting for services) and provide insight to what is available, or any changes/updates. Individuals may opt in to receive an electronic newsletter so they can stay informed.
2. The CDDO does not currently have a website. Best practice recommendation would be to create a stand-alone website providing Hetlinger CDDO information. Contract language states that if a CDDO has a website or develops a website after July 1, 2009, it will ensure that access to its CSP component information (if applicable) is available to the same extent and manner as to all other CSPs in the CDDO's area. The website at a minimum will contain information regarding a list of all Affiliates in the area, the CDDO's policy(ies), and the CDDO's forms.
3. Evidence from community service provider interviews and onsite materials, including affiliate meeting minutes shows the CDDO has a great process in place for Affiliate input. There is room for improvement and it is recommended that the CDDO adds a standing agenda item making input opportunities available for all affiliates. Anonymous Surveys could also be utilized to gather trends and allow CDDO to come up with additional agenda items to address any issues or take any suggestions from their affiliated providers.

SUMMARY: This review identified several strengths, as well as opportunities for improvement. Overall, the CDDO does a good job implementing policy and procedures as written. Evidence shows the CDDO does a great job interacting with their consumers/family/guardians and community service providers alike. Correcting the outcomes that resulted in findings and implementing some of the best practice and general recommendations will help the CDDO exceed regulatory requirements and benefit all involved in the process.

Peer Review Tool

Review Team Members:

- 1) Colin Rork, PICS, KDADS
- 2) Linda Young, PICS, KDADS
- 3) Kimberly Feldt, PICS, KDADS
- 4) Amber Vogeler, ECKAAA-CDDO Coordinator

Date of Review: August 22, 2017

CDDO Name: Hetlinger Developmental Services, Inc. CDDO

Address: 707 S. Commercial St., Emporia, KS 66801

Contact Person: Sara Pearson, Director of CDDO Administration

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Scoring Compliance Key

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

ACRONYM REFERENCE GUIDE

“ANE” Abuse, Neglect, Exploitation

“BASIS” Basic Assessment and Services Information System

“CDDO” Community Developmental Disability Organization

“COCM” Council of Community Members

“CSP” Community Service Provider

“ICF” Intermediate Care Facility

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

“KDADS” Kansas Department for Aging and Disability Services

“PD” Position Description

“QA” Quality Assurance

Program Contact:

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

#		1	2	7	Strengths & Comments	Findings & Recommendations
1.	CDDO ensures that its policies are distinct to the CDDO, and CDDO operated CSP policies are distinct to CSP. CDDO and CSP functions are governed by two distinct sets of policies.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
2.	Does the CDDO have a newsletter? If yes, review one years' worth. Does the CDDO ensure written communication demonstrates impartiality of the CSPs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		CDDO newsletter is recommended for best practice. Newsletters are a good way for the CDDO to stay in touch with individuals (especially those who are waiting for services) and provide insight to what is available, or any changes/updates. Individuals may opt in to receive an electronic newsletter so they can stay informed.
3.	Does the CDDO have a company website? If so, does website ensure impartiality of CSPs?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	There is a place on Hetlinger CSP website providing Hetlinger CDDO contact information, but this is not the CDDOs website.	CDDO does not have its own website. Recommend creating a standalone CDDO website that includes at a minimum: Affiliate List, Policies and Procedures, and CDDO Forms.

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 is in the process of updating all policies and procedures and have followed appropriate regulatory processes to update and send to KDADS for final approval.	CDDO's updated policies and procedures still have to be approved by KDADS. Review indicates minor updates/corrections that will be reflected in final policies and procedures.

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"/>	Review team viewed all current affiliate agreements, evidence shows the CDDO has current affiliate agreements for each affiliate. Brochures and desk review material accurately provides all current affiliations.	Upon development of a CDDO website, recommend maintaining current list of all affiliated providers and what services they offer.
3a.	If the CDDO has cancelled or suspended an affiliate agreement, was the action consistent with regulatory criteria? Criteria: 1) provider did not	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CDDO has not cancelled or suspended any affiliate agreements.	

	accept rate equal to that established by the Secretary 2) Provider has established pattern of not abiding by service area procedures 3) Entering into an agreement would seriously jeopardize the CDDO's ability to fulfill its responsibilities.					
3b.	Did CDDO report BASIS information to KDADS in the agreed upon timeframe? (All functional assessments shall be entered into KAMIS within seven calendar days of completion of the assessment.) KDADS will sample completed assessments and dates to compare against KAMIS entries (5 days to initiate assessment from date of request, 30 days to complete assessment from date of request, 7 days to enter in to KAMIS).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	KDADS requested sample of 14 consumers who had BASIS assessments in the last year and CDDO provided requested sample for review team. Evidence shows the CDDO reports BASIS information to KDADS in the agreed upon timeframe. All sampled were entered into KAMIS in 7 days or less. CDDO follows regulatory requirements and has a good process in place to ensure timely reporting.	
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 to view all crisis/exception requests in the last year. CDDO provided 5 files for review, all included appeal rights and showed evidence that CDDO processes/procedures meet state guidelines. CDDO has an interdisciplinary team to review requests for funding.	
3d.	Following a sample of eligibility determinations, do CDDO processes/procedures meet state guidelines? For example, was each person provided with "comprehensive	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	KDADS requested sample of 5 eligibility determinations completed by CDDO in the last year. Evidence shows CDDO process/procedures meet state guidelines and comprehensive options counseling	Though process meets state guidelines, additional outreach is recommended for consumers who have been determined eligible to ensure approved services are provided in a timely manner. Following

	options counseling?" Is the functional assessment/or reassessment occurring within the stated timeframe?				<p>was completed. Samples showed checked box indicating information was received, along with consumer/guardian signature. Consumer interviews confirm a timely and understandable process. Those who were not familiar stated that staff as very helpful educating and increasing their understanding of the process and their options.</p>	<p>eligibility determination, evidence shows that options were offered and a second letter was sent, but the majority of those sampled did not return the choice form. The process meets state guidelines, however additional follow-up could be provided to ensure those approved for services understand the process and that it is time to make a choice. Would also recommended to include a space on the form for those who are determined eligible, but decline services. This additional documentation would provide evidence that the individual understands they were determined eligible, were offered options, they are not interested, check box and sign indicating they are declining services.</p>
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"/>	<p>KDADS requested a sample of 9 consumers who had recent case transfers inside and outside the CDDO catchment area. All included CDDO Area Transfer Forms for those interested in transferring outside of the CDDO catchment area. For those transferring into the CDDO catchment area, Options Counseling Choice forms are provided. Evidence shows CDDO ensures processes/procedures meet state guidelines.</p>	
3f.	Following a sample of affiliation agreements, does CDDO ensure agreements are uniform for like services? CDDO operated CSP must	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Review team looked at all affiliate agreements and all are uniform for like services. Reviewed Hetlinger Developmental Services, Inc. Agreement</p>	

	have an affiliation agreement with CDDO. Affiliation agreement cannot extend advantages not offered to other CSPs.				and evidence shows uniformity. No agreements extend advantages not offered to other CSPs.	
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"/>	One year of Quarterly Affiliate meeting minutes were reviewed. Meeting minutes are very detailed and show the CDDO does a good job notifying about general changes to the system from the CDDO and the State. There was also extensive documentation about KDADS Licensing and their expectations, which the review team views as a strength. Meeting minutes indicate that CDDO does ask for agenda items from their affiliates prior to the meeting, however, they do not usually receive a response. Evidence shows CDDO also sought input from affiliates when updating their Policies/Procedures. Meeting minutes confirm that affiliates are provided opportunity for input.	<p>Recommendation that CDDO adds a standing agenda item making input opportunities available for all affiliates. CDDO does reach out to affiliates for suggested agenda items. It would be considered best practice to have a standing item to reserve time for CSPs to voice any issues and/or suggestions to improve CDDO area system management or otherwise.</p> <p>Anonymous Surveys could be utilized to gather trends and allow CDDO to come up with additional agenda items. CSPs may be more comfortable voicing their opinions utilizing an anonymous platform.</p>
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"/>	Administrative Assistant, HR, Financial Manager, Financial Assistant, Community Relations Manager, and Custodial Worker all work for both the CDDO and the CSP. All have appropriate position descriptions that obviously show which functions are CSP and which are CDDO. These items are highlighted in bold and titled "For Hetlinger CDDO and Hetlinger CSP" and "For Hetlinger CSP". Each provide very detailed descriptions of the functions they	

					will be performing. Review team believes position descriptions to be a best practice for any organization who has individuals working for both the CDDO and the CSP.	
3i.	CDDO will maintain a separation in function between the CDDO and CSP management and operations. It is clear which functions are CDDO and which are CSP. If there are personnel that work for both entities their position description reflect such. Paper and electronic information is stored securely to ensure CSP division of a CDDO does not have access.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	CDDO operations are located in a separate area of the building, away from CSP operations. The CDDO is able to close off their area from the CSP and have privacy. CDDO area includes 2 office spaces, storage, and conference table that when doors are closed works as an area to conduct assessments or provide information without CSP distractions. The CDDO has a separate stationary, paper and electronic information is stored securely in their area of the building, and full-time CDDO staff have name badges that display Hetlinger CDDO. Review of position descriptions shows that the CDDO does a very good job showing the separation in function for workers who perform job duties for both the CDDO and the CSP.	<p>The CDDO shares phone, fax, email handles, mailbox/PO Box with the CSP and there is no signage inside or outside the building indicating the CDDO is located there. The CDDO should develop a plan providing further separation from CSP operations.</p> <p>It is also recommended that the CDDO create a separate website from the CSP for individuals searching the internet for CDDO information. CDDO contact information is currently listed on CSP website and is the only place Hetlinger CDDO information is listed on the internet. By creating a standalone CDDO website individuals will be able to receive impartial information on all affiliates. Contract language states that if a CDDO has a website or develops a website after July 1, 2009, it will ensure that access to its CSP component information (if applicable) is available to the same extent and manner as to all other CSPs in the CDDO's area. The website at a minimum will contain information regarding a list of all Affiliates in the area, the CDDO's policy(ies), and the CDDO's forms.</p>

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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Hetlinger CDDO provides all interested affiliates a “Becoming an Affiliate of Hetlinger Developmental Services, Inc. CDDO” handout/handbook, which is very detailed. Handbook outlines the process for licensed and non-licensed affiliation. The CDDO also provided their “New Affiliate Checklist” which outlines pending items allowing them to track the CSPs progress in the application process.	There is no policy in place with Article 64 requirements that clearly address the CSP affiliation process, and states the affiliation requirements. There is evidence of a detailed process, but no formal policy/procedure included with Hetlinger CDDO’s policies and procedures. Recommend creating a policy and procedure outlining affiliation requirements that is included with the rest of their policies and procedures.
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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There are no current affiliates onboarding, no recent evidence to review documentation identifying current status of all individuals/entities/applicants requesting affiliation. The CDDO did provide evidence of their tracking process with their “New Affiliate Checklist”. Along with “Becoming an Affiliate” handbook, checklist shows evidence of a process for affiliation and its monitoring. Notification of appeal/grievance rights are included with copy of policy and procedures that interested affiliates receive. Copy of Policy and Procedures are on the New Affiliate Checklist and must be received and reviewed prior to completing	

					application. Once all items are checked off, the bottom of the checklist shows the date affiliate agreement mailed to provider, date signed agreement returned, date signed by Hetlinger Board of Directors, and date finalized agreement mailed to affiliate.	
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Outcome #5

K.A.R. 30-64-22 - Unbiased service option information

#		1	2	7	Strengths & Comments	Findings & Recommendations
5.	CDDO policies and procedures are implemented as written for sharing, with persons requesting/receiving services, impartial information regarding all service options. The policy and procedures ensure all CSP options are shared.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Policy and Procedure for Service Information Distribution Plan states that all affiliate information in CDDO service area will be distributed to new referrals and existing consumers in the CDDO area, in a manner that is impartial and equitable. CDDO provided brochure and options counseling form showing all options available. Evidence provided through BASIS, options counseling, transitions, and letters to consumers institutionalized indicates that policy and procedure is implemented as written.	

Outcome #6

K.A.R. 30-64-22 - Access to HCBS & Day/Res State Aid funding is not dependent on the person's chosen service provider.

#		1	2	7	Strengths & Comments	Findings & Recommendations
6.	CDDO policies and procedures for accessing state aid funds are made available on request. An impartial process for determining funding decisions is in place.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CDDO provided "Hetlinger CDDO State Aid Funding Spending Plan Fiscal Year 2018" indicating an impartial process for determining funding decisions is in place. In summary, State Aid is utilized by Hetlinger CDDO for the primary purpose of providing day services to individuals	Recommend creating a formal policy and procedure outlining the CDDOs process for utilizing state aid funds. This policy/procedure should also inform CSPs how state aid can be accessed. This would allow all to see what state aid is, what it can be used for, how it is currently utilized, and

				who do not currently receive waiver funding for that services. Any excess funds will go towards transportation to those providers of licensed day and residential services.	how it can be accessed.
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Outcome #7

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

#		1	2	7	Strengths & Comments	Findings & Recommendations
7.	Eligibility staff have been trained per regulation. CDDO has developed a training program and such have been approved by COCM. Evidence eligibility staff have completed identified requirements.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Single Point of Entry policy and procedure outlines the required training for Eligibility staff. These policies and procedures are approved by the COCM. The CDDO provided certification for current Eligibility Assessor Sara Pearson along with a record of training for Eligibility Determination Staff. Documentation is very thorough and includes documentation of training, date training received and the amount of time training lasted. Documentation is kept up to date, most recent training was 06/22/17.	
7a.	CDDO policies and procedures are impartially implemented as written for the process that is utilized for persons wishing to change CSPs in that CDDO area. Policies and procedures are implemented as written.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CDDO has a policy and procedure in place for Service Transition which outlines the process to initiate and complete transitions. CDDO provides "Service Provider Transition" checklist. This checklist has a place indicating the items the person's current provider must supply to complete the transition. Review of transitions shows policies and procedures are implemented as written.	

Outcome #8

K.A.R. 30-64-23 - Informed Choice of Community Service Providers

#		1	2	7	Strengths & Comments	Findings & Recommendations
8.	CDDO effectively maintains documentation of service provider change/transition requests/notifications. Notifications are maintained.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CDDO provided evidence of original email requesting transition. Following the email, options counseling is conducted. Rights and Dispute information is reviewed, consumer signs indicating this information was received and then signs a release of information. Evidence provided shows CDDO effectively maintains documentation of service provider change/transition requests and notifications are maintained.	

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"/>	Uniform Access to Services, Quality Enhancement, Quality Assurance, and Affiliate Agreements reinforce that all persons that request services, for whom funding is available, receive requested services. The policy also outlines the CDDO process for capacity and building resources to help serve those whom funding is available.	
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"/>		

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"/>	Quality Assurance policy and procedure is very thorough, as are the Quality meeting minute notes. Composition of Quality Assurance team is as outlined in CDDO policy and procedures, as well as Article 64. CDDO provided one year of quarterly QA meeting minute notes, which included results of completed QA visits. QA visit checklist includes questions for the consumer and available staff, record review, and a place to note any necessary follow-up measures taken as a result of the visit. None of the visits sampled in the last year required follow-up. QA reports showed staff were questioned on their definition of ANE and who to report to, ensuring staff were educated on ANE reporting information. Meeting minutes show tracking of crisis, eligibility, BASIS, portability, critical incidents, QA surveys and CDDO complaint tracking. Minutes also include a time set aside to go over any KDADS notices, such as a Licensing Notice of Findings/Determination, and/or areas of noncompliance. QA and Affiliates are made aware of this information and utilize to ensure compliance and services are provided in a consistent manner.	The QA process meets regulatory requirements and the CDDO does a great job documenting their visits as well as their meetings. It is recommended the CDDO conduct more visits outside of the QA process to increase oversight as well as compliance with Community Service Providers in their area. Increased visits were something Sara Pearson mentioned during the CDDO Director interview portion of the review, upon implementation and documentation, this would be considered a best practice.

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"/>	Though the CDDO has not had any remediation or follow-up required with any CSPs in recent history, there is a policy and procedure in place titled "Implementation Responsibilities". This policy and procedure outlines how CDDO remediates and follows up with affiliate noncompliance issues. Evidence shows the same remediation and follow-up process is utilized for all CSPs for same 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"/>	CDDO provided review team emails sent to those institutionalized in their catchment area. The email included choice brochure showing all the services available in their community. Email also includes BASIS information in compliance with Article 30-64-29. This information includes basic consumer rights.	
11a	Does CDDO have documentation of ICF/IID requests? Following a sample of ICF/IID request for admissions, did the CDDO follow appropriate "gatekeeping" policies and procedures to ensure appropriate processes were followed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The CDDO had one ICF/IID request in the last year, which was reviewed by Peer Review team. Evidence included referral and prescreen information showing the CDDO followed policy and procedure as outlined for Gatekeeping. CDDO policy and procedure ensures appropriate processes were followed and evidence/documentation shows this	

					process is implemented as written.	
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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"/>	CDDO provided 2016-2017 Council of Community Members Roster.	
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"/>	COCM minutes provide evidence that membership meets the regulatory requirements. Signed meeting minutes for COCM meetings in the last year show team is comprised of a majority of persons served/family members and/or guardians and includes affiliates of the CDDO. There is a sign-off sheet following every COCM meeting indicating who was in attendance and the type of member they are (person/family/guardian, CSP, or CDDO).	Roster shows when consumer/family member/guardian terms expire, however there were no term dates for CSP and CDDO staff. Would recommend CDDO tracks terms for CSP/CDDO staff the same way they do with consumers/family members/guardians. There was some discrepancy on the signature page with the meeting minutes. Some consumer/family member/guardians were marking CSP instead of the indicator that they are a person served, family member, and/or guardian. Recommend CDDO signature page is completed accurately to show membership meets regulatory requirements.

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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The CDDOs Dispute Resolution policy and procedure clearly addresses how persons requesting/receiving services and family members receive information regarding the CDDO complaint/grievance process is accessed. Service Information	

	information regarding the CDDO complaint/grievance process is accessed.				Distribution Plan explains that CDDO will distribute information on Dispute Resolution annually at BASIS, in the event of a change, and whenever a dispute arises. Evidence provided through signed choice forms from eligibility, BASIS assessments, and transitions indicate person requesting/receiving services and family members receive information regarding the CDDO complaint/grievance/dispute process. Choice forms have box indicating Rights and Dispute information received and these forms are signed by consumer/guardian indicating such.	
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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CDDO stated that the dispute resolution process has not been accessed since 2013. Evidence did show that individuals/consumers are informed about the Dispute Resolution and their Rights with any determination (eligibility, BASIS, crisis, ICF/IID, affiliation, etc.)	
13b	CDDO must maintain evidence of all incidence in which the dispute resolution process was initiated by any party.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CDDO stated that the dispute resolution process has not been accessed since 2013.	
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"/>	CDDO stated that the dispute resolution process has not been accessed since 2013.	

CONSUMER/FAMILY INTERVIEW	Y	N	N/A	COMMENTS
6 total respondents				
1) Did you understand the eligibility application process? If not, please explain	5	1	0	1) I did feel like it was a process in general. Pretty straight forward though. 2) No, it is no fault of Hetlinger, they tried to walk me through it. There is no clear outline of the steps. Came from Massachusetts, process is a lot simpler there, not as many involved in the process.
2) Do you believe the eligibility determination process is understandable and timely? If not, please explain.	6	0	0	1) They said it would be a couple of weeks and they processed it within that timeframe. 2) They processed it timely. 3) CDDO helped understand and completed process in a timely manner.
3) Do you believe the service referral process (including options counseling) was timely? If not, please explain.	3	0	3	1) On the waiting list, not receiving any services at this time. 2) Not eligible. 3) We got a case manager. My satisfaction with them is not that great. I don't like that there is not much separation between the CDDO and CSP. 4) On the waiting list.
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.	6	0	0	1) Yes, chose not to appeal decision. 2) Yes, but did not have to use it. 3) Yes, explained and received with the rest of information provided.
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	5	1) Yes, they went over the choices.
6) If currently receiving services, have you ever changed service providers? If so, how did you receive information about all your service options?	0	1	5	1) No, not yet. There is not a great selection of TCM providers to choose from in the area.
7) If currently receiving services, do you know who to contact if you want to change service providers? If so, who?	3	0	3	1) CDDO 2) CDDO and TCM 3) CDDO
8) Do you have any other information regarding your interactions with the CDDO that you would like for us to consider?	5	0	1	1) I think it was a wonderful experience and easy process to go through. The staff were very helpful. They were very patient with me as I was trying to get some necessary paperwork to them. I found them to be very helpful.

				<p>2) It is really challenging. We are not sure what is going on with our loved one. From what I could feel, they did a good job on the process, it just didn't turn out the way we wanted it to.</p> <p>3) Sara has been helpful throughout the process. Just don't think the overall system is set up well to avoid potential conflicts.</p> <p>4) Staff is very helpful throughout the process.</p> <p>5) The CDDO does a good job explaining things and are easy to approach with questions.</p>
COMMUNITY SERVICE PROVIDER INTERVIEW				COMMENTS
14 total respondents				
9) Does the CDDO have an effective process for completing the annual BASIS assessment? If no, please explain?	14	0	0	<p>1) Notice via email.</p> <p>2) Yes, it is done month prior.</p> <p>3) Annual BASIS assessments are completed in a timely manner.</p>
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.	14	0	0	<p>1) Each year for input.</p> <p>2) Sara does an excellent job through email.</p> <p>3) Discussion is held at affiliate meetings and Council of Community Member meetings.</p>
11) Does the CDDO share information about your CSP with persons seeking services?	13	1	0	<p>1) They maintain my brochures and present to individuals</p> <p>2) Have asked to close referrals.</p> <p>3) Through brochures.</p> <p>4) Sara completes at annual BASIS each year.</p> <p>5) Affiliates are listed in the CDDO brochure and affiliates may provide their agency brochures for display and distribution.</p> <p>6) As far as I know – they say they do – verbal and mailings.</p>
12) Does the CDDOs literature demonstrate impartiality regarding the CSPs in your area?	14	0	0	<p>1) Read the information.</p> <p>2) Brochures are disbursed at annual BASIS. If TCM only, sent in the mail.</p>
13) Are you aware of communication in which the CDDO benefitted one CSP over another? If yes, please explain.	1	13	0	

14) Does the CDDO manage an effective process for persons to access your services? If not, please explain.	14	0	0	1) Options Counseling/Choice Form. 2) As far as I know.
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?	12	2	0	1) Unaware. 2) Options Counseling/Choice Form. 3) We do not contact the CDDO in regards to individuals unless there is an issue with someone's services.
16) Does your CSPs grievance/dispute resolution process refer the person to the CDDO if the issue is unresolved? If not, please explain.	14	0	0	
CDDO STAFF INTERVIEW SARA PEARSON, CDDO DIRECTOR	Y	N	N/A	COMMENTS
17) Has the CDDO refused to affiliate with a provider? If so, was the appropriate regulatory criteria applied?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
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"/>	
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"/>	Ask them to participate in COCM, offer affiliate meetings. Some for licensed providers and case management providers. Go over things in meetings, offer them the opportunity to tell them what they think. If there are any KDADS policy updates she submits through email and goes over at affiliate meetings.
20) Does the CDDO maintain separate in CDDO/CSP functions? If so, how?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes, CDDO is very separate from CSP. Staff that do not need to know about her job, she does not share information with them. Don't go back and assist with behavioral things. They do emergency drills together, but other than that, job duties are very separate.
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"/>	Done verbally when meeting with them. Even after explaining, they still don't understand the difference, other than they know what side provides services and the other side gets them in line with services. There is no handout, but they do talk about it when offered funding, due to forgetting initial conversation. She will forward them to Hetlinger CSP staff if they would like additional information/forms.

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"/>	Haven't had anyone not serve due to behaviors. Someone stipulated some things in affiliate agreements, outlining who they have. They specialize, but do note that they will serve anyone regardless of disability.
23) Does the CDDO QA process assure services are provided in a manner consistent with Article 64 including: Choice, Person-Centered, Rights & Responsibilities, Paid/Delivered, Third party payment responsibility, Report ANE? If so, how?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Randomly pick QA committee reviews. Get copy of PCSP to read beforehand to learn about individual before meeting. Talk about reporting ANE regularly with affiliates and case management providers and reporting to CDDO when finding out about them. Offer choice annually with people. Have lots of people in area that are very familiar with changing providers and help/provide assistance with any help they may need. Encourage them to call and schedule face/to/face visits with providers for their choices. TCMs do 100% on caseload, use same form as QA committee; QA does 10%. Have 203 in services, QA did 21 last year. Generate random sample on spreadsheet. QA committee is separate from COCM. When committee meets, go over those, QA handles f/u. CDDO has list of everybody and does file reviews, visits people at their home and day sites. If follow-ups are not addressed, she would get out there. Director does reviews on own as she has time. CDDO does informal visits, does not really document unless things are not looking like they should. Have not had to do any corrective actions at this point.</p> <p>CDDO mentioned not getting notices of SUBSTANTIATED reports. She receives brief description and who they reported it to. (AIR, Licensing, DCF). But never get f/u. Follow up with CSP to determine what steps they are taking to resolve.</p>
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"/>	<p>Handout with Rights; on backside is current dispute resolution policy. If someone comes with complaint, inform them of Dispute Resolution. Informs to attempt internal methods before bringing to CDDO Dispute Resolution.</p> <p>They receive written form, assign counsel coordinator, try and come up with resolution. If can't will go to board of directors, whatever decision they make they can be appealed; after that would forward to office of appeals.</p>
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"/>	Like to think providers routinely call to see if can assist in any way, TCM call when the need sometime. Feels like they have open door and people and good about communicating with them. Do outside work with schools and teachers to get things started, let them know the process and they types of services people could receive.

26) In your opinion, what are some areas your CDDO could make improvements.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Do more onsite visits and going to actual agencies with people to see how things are going.
27) What CDDO function do you find to be the most challenging?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Explaining to people why waiting list is 7 years long. That they are eligible, but unless they are in crisis they are not getting services for 7 years. Listening to upset parents, etc. it is hard to explain. There are not a lot of outside referrals to refer them to.
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"/>	Don't do any formal planning as far as CDDO goes. Next 5 years hope CDDO is still here.
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"/>	Go over critical incidents in the last quarter. Hopefully see downward trends in things like hospitalizations and other items that show improvement in care. If there are no providers complaining about each other, that is success. Several years ago providers were not working well together, but things have improved greatly, which is a success; shows good things are going on in this area.
BASIS ASSESSOR INTERVIEW , BASIS ASSESSOR	Y	N	N/A	COMMENTS
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"/>	Varies on completion time. Initial, contact parent and sometimes they are in more of a hurry than other times. Example: called the parent, child was away for summer. Usually get it done pretty quickly. There are times where phone number is no good already, so they write them a letter and schedule them eventually. Someone already in services, talk to Case Manager. When new month is coming up, emails a list. Now that they have to have it done on a certain date, she reminds what date it is. Case manager sets up the meeting once date is established. Schedule as quickly as can, can be difficult depending on others schedules. Usually get it done w/in the month. They are flexible with scheduling meetings to the needs of the consumer/parents.
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"/>	Usually they are. There are some consumers that don't want to come and she doesn't make them if they don't. Especially with lower functioning individuals, they don't want to come or are too disruptive...She will see them at some point in time, either in the meeting, or sometime after. At some point does physically lay eyes on them, see them at other times.
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. BASIS assessor provides assessment to Sara and then she enters into system.

4) What do you find to be the most challenging aspect of your position?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Getting documentation. Have trouble with a couple agencies that keep forgetting documentation (hospitalizations, etc.), sometimes do well, but sometimes don't. Behavior documentation is troublesome at times. Have to remind providers/staff a lot to mark down what is happening. Sometimes parents refuse to do it because it is too much work. If they do not get documentation they need, she lets them know it is necessary. If agencies don't provide documentation in time, they just have to go with what they have.
5) In your opinion, what improvements can be made to the assessor process?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Promising a new tool all along, would really like to see that. Give a good idea of what the needs really are. Sometimes individuals are insulted by the questions. Find another way to determine their needs.
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"/>	Sara provides any new info. Used to go to Interhab conference, but is now too expensive. Do my own research. Redid the old training to review it to keep fresh.