



# **Delmarva Foundation Quality Assurance and Documentation**

Florida Association of Rehabilitation  
Facilities Annual Conference

September 21<sup>st</sup>, 2011



# Welcome and Ground Rules

- ✓ Respect
- ✓ Cell Phones
- ✓ Questions
- ✓ Surveys
- ✓ Sign-In Sheet
- ✓ Handouts
- ✓ Housekeeping



# Introductions

- Bob Foley – VP of Disability Related Programs
- Charmaine Pillay - Program Director
- Kristin Allen – Regional Manager
- Theresa Skidmore – Regional Manager



# Purpose of Training

- Provide overview and background about Florida Statewide Quality Assurance Program
- Address questions concerning Service Tools
- Have a dialogue and get your feedback moving forward



**We seek the same goal...**

**Quality Services**



# Purpose of the Quality Assurance Contract

- To evaluate the effectiveness of every provider involved in the life of a person
- To measure the efficiency and efficacy of the entire HCBS waiver service delivery system
- To help ensure the person is involved in the Support Plan and providers follow the Support Plan as written



# Discovery Process

## Eligible Services

- Adult Day Training
- Behavior Analysis
- Behavior Assistant
- Companion
- In Home Support
- Personal Care Assistance
- Residential Habilitation
- Respite Care
- Special Medical Home Care
- Support Coordination
- Supported Employment
- Supported Living Coaching



# Discovery Process

## Person Centered Review (PCR)

Person Centered Reviews assess support delivery systems from the perspective of individuals

## Provider Discovery Review (PDR)

Provider Discovery Reviews evaluate provider performance, based on service delivery measures and program standards





## Review Tools

### Tools used for a Person Centered Review

- ✓ National Core Indicator Interview
- ✓ Individual Interview Instrument
- ✓ Health & Behavioral Assessment
- ✓ Service Specific Record Review Tool

### Tools used for a Provider Discovery Review

- ✓ Service Specific Individual Record Review
- ✓ Administrative Review Tool
- ✓ Observation Checklist



# Service Specific Individual Record Review

- Does the service meet the person's needs/desired outcomes?
- Does the service match the description of the service per the Handbook?
- Does the service stay within the limitations per the Handbook? Does the service stay within the limitations of the Service Authorization?
- Does the record match the person's Support Plan?



## Service Specific and Administrative tool revisions

- After a year of implementation, sufficient information was collected to review and revise the Administrative and Service Specific Record Review (SSRR) tools that were developed in January 2010



## FARF Comments/Questions on Draft Revised Review Tools

### Question:

- Recoupment - Why are some of the standards so intensive regarding recoupment expectations?
  - Standards identified as potential recoupment are driven entirely by the Handbook.
  - Documentation required for reimbursement noted with an asterisk.



## FARF Comments/Questions on Draft Revised Review Tools

### Clarification:

- Documentation required to ensure that Support Coordinators are receiving documentation from provider agencies.

### Protocol:

- Examples could include fax transmittal reports with cover sheet indicating exact descriptions of what was faxed, submission tracking logs, date stamps, or indication of date of submission and method sent on the documentation.



# FARF Comments/Questions on Draft Revised Review Tools

Comment:

- The Service Log definition is expanded to include a summary of service when the log is not a service Summary.

**Handbook page 2-13 defines a service log as:**

*A form used to document service delivery. The service log shall include the recipient's name and Medicaid ID number. The log shall include the date, time, duration of the service, and summary of services provided.*



## FARF Comments/Questions on Draft Revised Review Tools

### Comment:

- New tools are already being used but they have not been approved.
- Providers may be seeing QARs using the protocols as an aid. In reality there are few actual new standards and we have instructed QARs to use the protocols for the standards that have not changed.



## FARF Comments/Questions on Draft Revised Review Tools

### Comment:

- We recommend removing any reference to Core Assurance requirements since the handbook is the source of the actual requirements.
- The Core Assurances are an appendix of the Handbook. Each service section specifically refers to the requirements noted in the core assurances





# FARF Comments/Questions on Draft Revised Review Tools

## Comment:

- Confusion regarding change over from Monthly to Quarterly reporting
- We are aware of this and are working closely with APD and AHCA on a solution.



## FARF Comments/Questions on Draft Revised Review Tools

Comment - Behavior Analysis Standard #1:

- A protocol question asks if the service log addresses the progress of the person towards his/her goals.
- Good feedback, Protocol will be revised to better match up with definition of Service Log.



# FARF Comments/Questions on Draft Revised Review Tools

Comment - Behavior Analysis Standard #5:

- DD Handbook does not require a separate graph every month, it simply states that data needs to be graphed at least monthly. The standard should require that a graph be available that depicts data plotted at least monthly during the 12 month period reviewed.
- Protocol language “each graph must be distinctly separate and illustrate data collected throughout the specified month” will be revised/clarified.



## FARF Comments/Questions on Draft Revised Review Tools

Comment – Behavior Analysis Standard 8:

- Resubmission of a revised behavior plan to LRC within 5 days is being added as a requirement.
- Protocol language will be revised, “5-day rule” does apply but not in regard to re-submission.



# FARF Comments/Questions on Draft Revised Review Tools

## Comment: Behavior Analysis Standard 19:

- The method to gather info. about a persons' behavioral, physical, emotional health; only documentation required should be to have a copy of the current support plan as this document (in theory) should contain the history.
- Support Plan may or may not include this information.
  - Acknowledge and serve the whole person
  - Collective Responsibility
  - Each provider type deals with the person in varying settings and circumstances



## FARF Comments/Questions on Draft Revised Review Tools

Question – Behavior Analysis Standard 25:

- Why do all providers have to educate on rights?  
This should just be from the WSC.
- Everyone has a role
- Each provider type deals with the person in varying settings and circumstances



## FARF Comments/Questions on Draft Revised Review Tools

Question – Standards 22-25 BA & 17- 20 RH

- Why are standards related to addressing expectations, Grievance Policy, and Rights in the service specific tool instead of administrative?
- Relation between PCRs and PDRs
- Reviewer & Provider feedback; individual level



# FARF Comments/Questions on Draft Revised Review Tools

Comment - Residential Habilitation Standard 4:

- The standard requires documentation to see if the IP is mailed to the guardian within 30 days. The guardian receives the support plan that contains the IP goals. This is a redundant and extra expense requirement for providers.
- Response - Mailing the Implementation Plan to the guardian within 30 days is a handbook requirement (2-11).
- Implementation Plan's are driven by the Support Plan but actually identify the strategies to be used and the system of data collection to assess progress. The Support Plan does not include this detail.





## FARF Comments/Questions on Draft Revised Review Tools

Comment - Residential Habilitation Standard 15:

- The standard requires providers to conduct a formal choice/preference inventory. We do not understand how this relates to the Residential Habilitation service.
- Everyone has a role in supporting choice



# National Core Indicators (NCI)

NCI Consumer Survey Results by Focused Areas					
January - June 2011					
Question Description	# of Responses	Pct Negative	In Between	Pct Positive	Year 1 Positive
Achieving Results/ PC Approach	2,878	13.2%	6.8%	80.0%	74.0%
Choice	5,506	23.4%	34.1%	42.6%	45.8%
Safety	1,697	3.7%	7.0%	89.3%	88.7%
Rights	4,079	8.1%	3.5%	88.4%	86.8%
Community Inclusion	7,502	30.9%	3.1%	66.0%	64.1%
		Poor	Fairly Good	Excellent	Exc
Health	676	5.0%	62.9%	32.1%	32.6%



## FARF Comments/Questions on Draft Revised Review Tools

### Comment – Residential Habilitation Standard 16

- Requires documentation to show that the provider assists individuals to increase community involvement. The standard has nothing to do with the service.
- Under Place of Service for RH on page 2-59, 60 it says: some activities associated with daily living that generally take place in the community, such as grocery shopping, banking or working on social and adaptive skills are included in the scope of this service.



## FARF Comments/Questions on Draft Revised Review Tools

Question – Residential Habilitation Standard 22:

- Mutually agreed upon times and settings; Residential Habilitation includes training and supervision; how can we pinpoint a specific time for this?
- We will take your feedback to AHCA & APD



# Please Complete the Training Evaluation

All Review Tools & Procedures are  
posted to Delmarva's Florida website

[www.dfmc-florida.org](http://www.dfmc-florida.org)

Thank You!!!