

Quality Assessment & Improvement Process, Cycle 1, Year 3: Changes for Fiscal Year 2019-2020 ODP Announcement 19-080

AUDIENCE:

Administrative Entities (AEs), Intellectual Disability/Autism (ID/A) Supports Coordination Organizations (SCOs), Adult Autism Waiver (AAW) SCOs, ID/A Providers, Agency with Choice (AWC) Financial Management Services (FMS) Providers and AAW Providers excluding Intermediate Care Facilities for persons with an Intellectual Disability (ICF/IDs) and Vendor/Fiscal Employer Agent (VF/EA) Financial Management Services (FMS) Providers

PURPOSE:

This Office of Developmental Programs (ODP) communication announces the summary of changes related to Cycle 1, Year 3 of the Quality Assessment & Improvement (QA&I) Process for the 2019-2020 Fiscal Year and posting of revised QA&I resource materials on the [MyODP Training & Resource Center](#). As a reminder, any information regarding the QA&I Process can be accessed under the following path on MyODP: Resources > ODP Information > QA&I Process.

All entities and staff with a role in the QA&I Process should review all resource materials so they are aware of the changes and can properly implement and complete the QA&I Process.

DISCUSSION:

The ODP QA&I Process is designed to conduct a comprehensive quality management review of county programs, AEs, SCOs, and Providers delivering services and supports to individuals with intellectual disabilities and autism spectrum disorders. The mission of ODP is to support Pennsylvanians with developmental disabilities to achieve greater independence, choice and opportunity in their lives. ODP's vision is to continuously

improve an effective system of accessible services and supports that are flexible, innovative, and person-centered. This QA&I Process is one of the tools ODP uses to evaluate our current system and identify ways to improve services for all individuals.

The QA&I Process is based on a three-year cycle. **All entities are required to complete a Self-Assessment every year and participate in an onsite review at least once per cycle.** FY 2019-2020 begins the third and final year of Cycle 1 of the QA&I Process. To prepare for Cycle 1, Year 3, ODP has made several changes to the QA&I Process, based upon a review of processes and tools that were used in Cycle 1, Year 2, the 55 Pa. Code Chapter 51 regulations, the Administrative Entity Operating Agreement, the Adult Autism Waiver and AAW Supplemental Agreement and changes to Federal regulation requirements. In addition, changes and clarifications were made to the processes and tools based on feedback received from AEs, SCOs and Providers.

Effective July 1, 2019, all AAW Providers and SCOs will be expected to participate in QA&I activities.

Comprehensive Reports:

All Comprehensive Reports for Cycle 1, Year 1 have been posted on the MyODP Training & Resource Center under the following path: Resources > ODP Information > QA&I Process > QA&I Reports located under the “How Is the System Working for People We Support? Results from ODP’s Quality Assessment and Improvement (QA&I) FY 2017-18 Process” section.

Changes:

For FY 2019-2020, ODP has made the following changes:

QA&I Process document:

- Inclusion of AAW QA&I.
- Addition of AAW and AAW Supplemental Agreement as additional outcomes regarding AAW Provider and SCO requirements.
- Clarification regarding the requirement for all entities to ensure contact information is current and up to date.

- Revisions made to the Terms & Definitions section to clarify current definitions and provide definitions for AAW & ID/A Waivers.
- Revisions made to Sampling section to include information regarding the Core Sample for AAW Enrollees and clarify AWC FMS sampling.
- Clarification in the Self-Assessment section which states that if an entity serves less than 5 individuals, 100% of the individual records will be reviewed. Further clarification provided regarding AWC FMS self-assessment criteria.
- In the Desk Review section, included Scales of Independent Behavior Revised (SIB-R), Periodic Risk Assessment (PRE), and Quality of Life Assessment as available data sources.
- In the Individual Interviews section, a requirement was added for all individual interviews to be completed by December 31st.
- Requirement that ODP will conduct all interviews of individuals identified in the Core sample for AAW.
- Revisions made to the Onsite Review section to combine the two previous subsections: ODP Onsite Review of AEs and SCOs and AE Onsite Review of Providers.
- Revisions to Claim and Service Documentation section to reflect current process.
- Clarification provided in Comprehensive Report section regarding time frames of issuance in the event an entity did not have any noncompliant findings.
- Revisions made to Considerations section to include the AAW Appendix G related to individual health and safety.
- Revisions made to the QA&I Process Timeline based on time frames updated throughout QA&I Process document.
- Enhancements to various QA&I templates.

Process for updating contact information:

ODP has issued Announcement 19-071, “Process for Updating Entity Contact Information for Quality Assessment & Improvement (QA&I) Process” which provides guidance for entities updating their primary and secondary contacts. As a reminder, any changes to the primary and/or secondary contacts should be submitted via the [ODP Quality Assessment & Improvement Contact Information Form](#). It is the responsibility of the entity to ensure that this information remains up to date.

QA&I AE Tool:

- Guidance regarding Quality Management Plan (QMP) revised to align with SCO and Provider QA&I Tools.
- Remediation option under QMP question added regarding the development of a QMP.
- Question and guidance regarding the use of performance data in the development of QMP revised.
- Guidance regarding measuring progress toward QMP goals and objectives revised.
- Guidance for PUNs report question updated.
- Questions and guidance updated on some questions to reflect requirements of March 2019 AE Operating Agreement.
- Guidance regarding Auto Authorization protocol updated to reflect requirements of March 2019 AE Operating Agreement.
- Question added regarding requirement for Human Rights Committee (HRC).
- Question added regarding Provider Risk Screening process. This question is marked exploratory and non-scored.
- Question added regarding AE selection of self-assessment sample based on ODP QA&I criteria. This question is marked exploratory and non-scored.
- Question added regarding AEs utilizing Provider self-assessment entries during Provider QA&I reviews. This question is marked exploratory and non-scored.
- Clarification provided in guidance regarding change in need.
- Guidance and remediation revised regarding timeliness of DP251.
- Guidance updated to include Utilization Review Form as acceptable documentation in some cases.
- Guidance updated regarding waiver services being initiated within 45 calendar days.
- Questions and guidance updated regarding approval and authorization of ISP.
- Clarification provided regarding auto-authorized (ODP Approved) ISPs and opportunities for community activities.
- NA options regarding data and policy and record review questions added as applicable.
- Source documents updated.

QA&I SCO Tool:

AAW SCO Tool:

- A new tool has been created for AAW SCOs for Cycle 1, Year 3.

ID/A SCO Tool:

- Guidance regarding Quality Management Plan (QMP) revised to align with AE and Provider QA&I Tools.
- Remediation option under QMP question added regarding the development of a QMP.
- New question added regarding measuring progress toward QMP goals and objectives revised.
- Question and guidance regarding the use of performance data in the development of QMP revised.
- Guidance regarding maintaining a certified investigator revised.
- Guidance and remediation regarding SC Orientation completed prior to working with individuals revised.
- Guidance regarding an individual having an identified change in need revised.
- Removed question regarding SC submitting annual review ISP for approval and authorization at least 30 days prior to Annual Review Date (ARD).
- Guidance regarding justification for services not being provided revised.
- Guidance regarding how information on identifying and reporting abuse, neglect and exploitation revised.
- Removed question regarding notifying Human Rights Committee of incidents reported by SCO.
- Question added regarding SCO selection of self-assessment sample based on ODP QA&I criteria. This question is marked exploratory and non-scored.
- Question added regarding Community Participation Support.
- NA options regarding data and policy and record review questions added as applicable.
- Source documents updated.

QA&I Provider Tool:

AAW Provider Tool:

- A new tool has been created for AAW Providers for Cycle 1, Year 3.

ID/A Provider Tool:

- Agency with Choice (AWC) questions added to the Provider Tool at the end of the document. These questions are required for any Provider that renders AWC Financial Management Services (FMS) services.
- Guidance regarding Quality Management Plan (QMP) revised to align with AE and SCO QA&I Tools.
- Questions related to region Assigned AE is located and Provider's Assigned AE reversed.
- Remediation option under QMP question added regarding the development of a QMP.
- Question and guidance regarding the use of performance data in the development of QMP revised.
- Question added for Community Participation Support (CPS) Providers who render the prevocational component of CPS regarding the number of individuals that have transitioned from prevocational services to competitive integrated employment during the review period.
- Question added regarding the Provider's sexual health and personal relationships policy. This question is marked non-scored.
- Question added regarding the Provider's written process regarding individual choice in sharing a bedroom with another individual. This question is marked exploratory and non-scored.
- Guidance and remediation regarding training questions have been revised.
- Question added regarding Provider selection of self-assessment sample based on ODP QA&I criteria. This question is marked exploratory and non-scored.
- Question and guidance regarding waiver participants who are identified as deaf revised.
- Questions and guidance regarding communication revised.

- Questions and guidance regarding employment services revised to align with current service definition terminology and requirements.
- Questions regarding individual rights for individuals receiving services in unlicensed Residential Habilitation or unlicensed Life Sharing homes added. These questions are non-scored.
- Guidance regarding Provider service delivery related to type, scope, amount, frequency and duration revised.
- NA options regarding data and policy and record review questions added as applicable.
- Source documents updated.

QA&I Interview Tool:

- Question added to document who is present at the interview so that person does not need to be listed on all of the following questions.
- Two questions added from Information Sharing and Advisory Committee (ISAC) recommendations regarding relationships and staff interaction.
- Question added regarding individual rights around communication.
- Two questions added regarding Community of Practice.
- Revised contact information for Community of Practice.

Availability of resources and materials:

The updated resources and materials for Cycle 1, Year 3 of QA&I are available by logging on to the [MyODP Training & Resource Center](#). As a reminder, any information regarding the QA&I Process can be accessed under the following path on MyODP: Resources > ODP Information > QA&I Process.

NOTE: There may be other changes to the QA&I processes. ODP will update the MyODP website and distribute communications to the field regarding those changes.

INQUIRIES: Please direct any inquiries, issues or concerns regarding this communication to the QA&I Process mailbox at RA-PWQAIPProcess@pa.gov.

If there are any questions related to the QA&I Process, please contact the appropriate staff found on the “QA&I ODP Contacts” file.

This communication obsoletes ODP Announcement 060-18.