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# QUALITY ASSESSMENT AND IMPROVEMENT: COMPREHENSIVE REPORT

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Pennsylvania Office of Developmental Programs

Berks AE Mental Health/Developmental Disabilities

Administrative Entity

*November 22, 2017*

Introduction

The Office of Developmental Programs (ODP) Quality Assessment and Improvement (QA&I) process is designed to conduct a comprehensive quality management review of county programs, Administrative Entities (AE), Supports Coordination Organizations (SCO), and Providers delivering services and supports to individuals with intellectual disabilities and autism spectrum disorders. The focus of this process is on quality assessment and improvement as it relates to the participants' experience with services and supports.

The mission of the Office of Developmental Programs (ODP) is to support Pennsylvanians with developmental disabilities to achieve greater independence, choice, and opportunity in their lives. The office seeks to continuously improve an effective system of accessible services and supports that are flexible, innovative, and person-centered. In keeping with the mission and vision, the QA&I process integrates Everyday Lives Values in Action, ISAC recommendations, and the Consolidated and/or Person/Family Directed Support (P/FDS) waiver performance measures. Additionally, the QA&I process collects data for and validates that AEs comply with the AE Operating Agreement.

The QA&I process is accomplished by using a combination of self-assessment, desk review, onsite review and corrective action and quality improvement plans. The Quality Assessment and Improvement Comprehensive Report has been developed to provide you with both information and data that has been collected during the self-assessment you have completed,

the review of the sample that has been selected for your organization, and information both gathered and shared during the on-site portion of the process. As we discussed during your on-site visit, this year's focus areas include ensuring everyone has an Everyday Life and promoting the ISAC recommendations: specifically, assuring effective communication, increasing employment, and improving quality.

## Summary of Berks AE Development Disabilities

### Administrative Entity

Berks AE Mental Health/Developmental Disabilities (hereafter referred to as Berks AE) is in Reading, PA. Berks AE contracts with a separate and distinct unit within Service Access and Management, Inc. (hereafter referred to as SAM AE) for the provision of AE Support Services.

During Fiscal Year 2016–2017, Berks AE served more than 1700 people, 512 people in Consolidated Waiver and 444 people in the Person/Family Direct Support Waiver. Berks AE reports 64 new Waiver enrollments during this same time.

Berks AE's mission statement reflects a dedication and commitment to the values of Everyday Lives in its drive, "To provide quality care as well as the delivery of efficient public services and supports for individuals with mental illness and intellectual disabilities so that they can increase their opportunities and abilities to lead lives of dignity and independence. ..."

Edward B. Michalak, PsyD is the MH/DD Administrator, Mary Hennigh, RN-BC, and Michele Ruano-Weber, MA, CPRP serve as Deputy Administrators.

### QA&I Summary

Berks AE completed a self-assessment during the QA&I Cycle 1 Year 1 consisting of 10 records, two Base, four Consolidated and four P/FDS Waiver records and a review of data and policy. The Self-Assessment was finalized on August 31, 2017.

ODP pulled a comparable sample consisting of 32 records (five Base, twelve Consolidated and fifteen P/FDS Waiver records) and completed a review of data and policy. In addition, ODP also reviewed the record of nineteen newly enrolled waiver participants. To fully evaluate the participant's experience with services and supports, individual interviews are considered a critical component of the QA&I process. Interviews were conducted prior to and after the AE onsite review. *Charting the Life Course Experiences and Questions Booklet: A Guide for Individuals, Families, and Professionals* and PA Family Network information were shared with

interviewees and/or staff. Twenty-six interviews were completed, ten interviews were completed by ODP, and sixteen interviews by the local IM4Q Program.

The names of those selected in the sample was shared with Berks AE on October 4, 2017. The onsite review was completed on October 18 and 19, 2017. The last interview was completed on October 25, 2017. The ODP QA&I team consisted of Rachel Toman QA&I Regional Coordinator, Jessica Lopez Record Reviewer and Marie Craven, LOC.

### Data Analysis

Berks AE self-assessment was reviewed, and the performance was evaluated. The self-assessment demonstrates solid performance in most areas including Person Centered Planning Service Delivery, and outcomes. Two areas which were noted for improvement via the self-assessment included:

*16.00.00. ISP addresses all assessed needs through waiver funded services or other funding sources.*

*23.00.00. The AE promotes experiences and services that enables participants to obtain and benefit from competitive integrated employment.*

The Self-Assessment and ODP desk and onsite review were consistent, producing similar if not identical scores for most areas. Strong performance (100% compliance) was noted in many areas to include Person Centered Planning Service Delivery and Outcomes, Waiver eligibility, PUNs, etc. The Level of Care's newly enrolled waiver records are found to be vastly compliant with only one area scoring 95% and all other measures achieving 100% compliance. One hundred percent compliance was also noted with the core sample related to documentation of waiver enrollment and reevaluation. Please see attached detail report for additional information. The following areas are noted by ODP as areas requiring a Plan to Prevent Reoccurrence:

*08.00.00. The County completes OBRA related responsibilities in accordance with Federal requirements under the Omnibus Budget Reconciliation Act (OBRA) of 1987.*

The services as identified in the OBRA - Determination on Need for Specialized Services were provided as identified on the OBRA concurrence form. Berks AE provided supporting evidence demonstrating service utilization for nine of the ten records reviewed.

*20.00.00. Individuals/families are afforded choice of providers including SCO's.*

Berks AE now offers choice of willing and qualified service providers at intake; however, older records reviewed in the sample did not document choice offered by the Administrative Entity.

31.00.00. The AE analyzes systemic concerns related to restrictive procedures and restraints.

The AE Operating Agreement, effective July 2017, includes the requirement for Berks AE to develop and maintain a Human Rights committee. Berks AE has a protocol to safeguard the human rights of people receiving services and supports and is beginning to formulate a committee which consists of provider and SCO representatives.

### Results and Performance Evaluation

Using the focus areas identified in the Introduction, and applying those to the results of both assessments, Berks AE overall performance aligns with the ISAC recommendations, Everyday Lives Value in Action, AE Operating Agreement, and CMS Assurances.

Twenty-six personal interviews were conducted with individuals to obtain firsthand knowledge of the participants' experience with services and supports received. The person was free to invite anyone they would like present for the interview and many of the interviews were conducted in their home and included family members. In addition, staff reporting, and reviewer observation were used to gain insight into the participants' experience. Overall, the participants are very satisfied with their services and/or supports. Staff were able to identify risks and what mitigation strategies should be implemented. Most reported only spending time socializing with family and staff, though the activities are chosen by the participant. Participants, family members and provider staff all report that they have not had access to Life Course Framework or tools. ODP shared *Charting the Life Course Experiences and Questions Booklet: A Guide for Individuals, Families, and Professionals* with participants and family members participating in the interviews. There were a few issues noted during the interviews and record reviews which were promptly addressed by the AE. One issue was also referred to ODP licensing for follow-up.

Berks AE is committed to the provision of quality services. This is most evident through the discussion with staff who are committed to promoting the values of Everyday Lives and supporting people with complex needs. Berks AE staff promote strong partnerships with other local Human Service Systems including C&Y, Aging, Health Choices, etc. Human service system meetings are routinely held to discuss high risk children. Berks AE promotes community partnerships through participation in numerous Community Outreach Events and Presentations, promotion of "211" hotline providing information about health and human services, Transition Councils, Employment First Committee, etc.

Berks AE believes the longevity, skills and knowledge of staff contributes to the success of their Administrative Entity. They continue to advance working relationships with SAM AE and SCOs

through existing meeting, tracking and reporting structures. The AE Unit Summary prepared by SAM AE, is used to track the performance of AE administrative functions purchased by Berks AE. The report provides detailed data regarding choice of SCO provider, waiver services initiated within 45 days, quality plan reporting, incident management, eligibility, etc.

The Quality Management Plan provides current data and analyses to inform policy and assess the quality of services. The action plan and outcomes selected and prioritized in the Quality Management Plan are aligned with the ISAC recommendations and Every Day Lives Values in Action. The AE does not have a staff person who is ODP QM certified. The purpose of the ODP QM Certification program is to build quality management capacity by enhancing the knowledge and skills of staff functioning as leaders throughout the service delivery system.

Areas for improvement as identified in the attached detail reports include the development of an AE Human Rights Committee to review and authorize all restraint and restrictive interventions. During the QA&I on-site review, ODP discussed the development of their protocol with the AE. ODP recognizes that AE's are just beginning to execute their protocol. Knowing that this is a new requirement, ODP is expecting varying degrees of compliance during the first year. Additional guidance is being developed by ODP, which will be issued when complete. This guidance will assist AE's with meeting expectations around HRC in the Operating Agreement.

Remediation and a Plan of Correction need to be submitted within 30 days to address the areas on non-compliance noted on the attachments. Please refer to the attached Score Report, Details Report, and Corrective Action Plan for additional details. Remediation and a Plan of Correction need to be submitted within 30 days via the AE Database.

Thank you to you and your team for your ongoing support during this process, and for the quality work you do every day.

#### Appendices

Appendix A: QA&I Core Sample Score and Detail Reports

Appendix B: Level of Care Worksheet

Appendix C: Corrective Action Plan