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# QUALITY ASSESSMENT AND IMPROVEMENT: COMPREHENSIVE REPORT

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Pennsylvania Office of Developmental Programs

Wayne County Administrative Entity

QA&I Review and Comprehensive Report for

**Community Vocational Services, Inc.**

*December 22, 2017*

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## Introduction

The Wayne County Administrative Entity reviewed Community Vocational Services, Inc. in late November and December 2017 as part of the Office of Developmental Programs, Provider Quality Assurance and Improvement Process, Cycle 1, Year 1. The purpose of this Comprehensive Report is to compile the official findings of the Wayne County Administrative Entity during the Provider Quality Assessment and Improvement Process to include all aspects of the review to include: the desk review, on site review, face-to-face interviews and analysis of the self assessment submitted by Community Vocational Services, Inc.

## QA&I Summary

In August of 2017 Administrative Entities were provided with the list of the Office of Developmental Programs Providers due for On Site Provider Quality Assessment and Improvement Reviews, Cycle 1, Year 1. As part of this process all providers were required to submit a Self Assessment Report and supporting documentation. On August 22, 2017 Community Vocational Services, Inc. submitted an electronic copy of their self assessment via email. This email did not contain the required supporting documentation however, the provider did hand deliver a hard copy of the required documents on August 31, 2017. After review of the submission of the Required Documentation, the Wayne County Administrative Entity met with Community Vocational Services, Inc. on Friday, October 6<sup>th</sup> to make recommendations to their Quality Management Plan and Restrictive Procedures Policy. The Wayne County Administrative Entity forwarded a two week notice to include the MCI #'s of the 5 participants in the sample as well as the list of required documents and documentation required to be available for the on site visit / review. The On Site portion of the Process began with the entrance interview on Tuesday, November 28<sup>th</sup> at 8:30 a.m. The review continued through the November 29<sup>th</sup> at the administrative office of Community Vocational Services, Inc. The Provider made available all required materials and documentation as required. It can be noted that the providers records were very organized and easy to review. Provider Screening Policies and Procedures were in compliance. Demonstration of staff training, annual training, required training, individual participant training; and policies and procedures were all available and were inclusive of all requirements and occurred timely according to records. Five (5) Individual Participant Provider

Records to include Promise billing records were reviewed. On December 5<sup>th</sup> and 6<sup>th</sup> the Wayne County Administrative Entity interviewed five (5) staff members and four (4) individual participants. 1 participant declined to be interviewed. It can be noted that the 4 participants interviewed reported high satisfaction with the services provided.

The Wayne County Administrative Entity sought technical assistance from the Northeast Regional Office of Developmental Programs for appropriate remediation activities in light of findings during the review. The Wayne County Administrative Entity met with Community Vocational Services, Inc. on Friday, December 22, 2017 for the Exit Interview. This exit interview was originally scheduled for the week before but needed to be re-scheduled by the Provider due to an unforeseen circumstance. The QA&I Comprehensive Report was completed and sent to Community Vocational Services on January 11, 2018. Community Vocational Services, Inc. needs to respond to the Comprehensive Report with evidence of remediation and plans to prevent recurrence within 30 days or by February 10, 2018.

#### *Data Analysis and Performance Evaluation*

After receipt of and review of the Self Assessment data and required documentation, the Wayne County Administrative Entity made recommendations for changes to the Community and Vocational Services, Inc. Quality Management Plan and the Restrictive Procedures Policy and Procedures to ensure compliance with ODPs standards. Following a meeting on Friday, October 6<sup>th</sup> outlining the recommendations for improvement, Community Vocational Services, Inc. revised both their Quality Management Plan and their Restrictive Procedures Policy and Procedure.

It can be noted that Community and Vocational Services, Inc. staff were very accommodating and were very well prepared for the onsite portion of the review and had all required documentation, reports, policies and billing information available, organized and for review. Additionally it can be noted that the provider has nice practices in encouraging a healthy, active lifestyle to include support of gym or YMCA memberships, Special Olympics support and participation as well as participating in many community activities such as Toy Drives, Open Mic nights and no child hungry feeding programs.

The Provider's self-assessment results were 100% for all performance areas. Findings by this AE during review requiring remediation and corrective action were found during the Participant Record Reviews and completion of the QA&I MCI review. The Provider QA&I review indicated 3 areas: Q. 22. 20%, Q. 24. 0%, Q. 42. 0%. Participant Record Reviews and completion of the QA&I MCI review, Q. 22 – The Provider documents delivery of services/supports in the type, scope,

amount, frequency and duration specified in the Participants ISP; Q.24 – If a progress note indicates lack of progress in achieving an outcome, the Provider progress note indicates what actions have been taken; and as a result of non compliance with Q.22, listed above, Q. 42 – The Provider reported all critical incidents.

**MCI #: (900119138)** – It was determined that Community Vocational Services was inappropriately providing/billing IHCS services while they were providing transportation only to this participants place of employment on Fridays. Pursuant to Bulletin 00-17-03 ISP Manual, Attachment 1, Section 13.14, In Home and Community Support is a direct service provided in home and community settings to assist participants in acquiring, maintaining and improving the skills necessary to live in the community, to live more independently, and to participate meaningfully in community life. The definition goes on to state that ‘In Home and Community Support Services **CAN NOT** be used to solely transport a participant as this would be considered a Transportation service available in the Waiver.’ More dismaying is that the Supports Coordinator has documented in HCSIS that in July of 2017 the SCO received technical assistance from the Administrative Entity regarding this issue and that both Community Vocational Services, Inc. and Devereux (residential provider) staff were made aware of the guidance and direction related to this participants transportation to work.

Effective immediately Community Vocational Services, Inc. staff must **NOT** provide In Home and Community Support service for the sole purpose to transport to work. The team must meet and rectify plans for the provision of services in accordance with Waiver Service Definitions.

Additionally, both August and September progress notes for this participant indicated a lack of progress but does not document a plan to rectify.

**MCI #: (370128813)** - It was determined that Community Vocational Services is inappropriately providing and billing In Home and Community Support for the transportation of this participant to his place of employment.

Pursuant to Bulletin 00-17-03 ISP Manual, Attachment 1, Section 13.14, In Home and Community Support is a direct service provided in home and community settings to assist participants in acquiring, maintaining and improving the skills necessary to live in the community, to live more independently, and to participate meaningfully in community life. The definition goes on to state that ‘In Home and Community Support Services **CAN NOT** be used to solely transport a participant as this would be considered a Transportation service available in the Waiver.’

Effective immediately, Community Vocational Services, Inc. staff must **NOT** provide In Home and Community Support service for the sole purpose to transport participants to work. The team must meet and rectify plans for the provision of services in accordance with Waiver Service Definitions.

**MCI #: (680126174)** - It was determined that Community Vocational Services, Inc. inappropriately submitted billing for In Home and Community Support, with a staff to consumer ratio of 1:1; when they actually provided In Home and Community Support, with a staff to consumer ratio of 1:2 on several occasions.

Effective immediately, Community Vocational Services, Inc. staff must **NOT** provide In Home and Community Support services, with more than 1 consumer at a time, unless it is agreed upon by the team, requested via a service request processed by the Supports Coordinator and authorized by the Administrative Entity. Billing for the dates of service where IHCS 1:1 was billed but IHCS 1:2 was provided must be immediately pulled back from Promise. The team must meet to determine if IHCS 1:2 is needed and if so, a service request must be processed and submitted to the Administrative Entity for review and authorization. This violation is indeed Medicaid fraud.

The Administrative Entity has discussed staffing ratios and service provision with Community Vocational Services, Inc. in the past and the Supports Coordination Organization staff has also discussed this issue and documented these discussions in service notes in HCSIS. The team must meet and rectify plans for the provision of services in accordance with Waiver Service Definitions. Additionally, progress notes for this participant indicated a lack of progress but did not document plans to rectify.

**MCI #: (360124772)** - It was determined that Community Vocational Services, Inc. inappropriately submitted billing for In Home and Community Support, with a staff to consumer ratio of 1:1; when they actually provided In Home and Community Support, with a staff to consumer ratio of 1:2 on several occasions.

Effective immediately, Community Vocational Services, Inc. staff must **NOT** provide In Home and Community Support service with more than 1 consumer at a time unless it is agreed upon by the team, requested via a service request processed by the Supports Coordinator and authorized by the Administrative Entity. Billing for the dates of service where IHCS 1:1 was billed but IHCS 1:2 was provided must be immediately pulled back from Promise. Additionally neglect incidents need to be entered by CVS for the dates of service that Sydney was not staffed 1:1 as her ISP does not indicate she can be independent in the community. The team must meet to determine if IHCS 1:2 is needed and if so, a service request must be processed and submitted to the Administrative Entity for review and authorization. This violation is indeed Medicaid fraud. The Administrative Entity has discussed staffing ratios and service provision with Community Vocational Services, Inc. in the past and the Supports Coordination Organization staff has also discussed this issue and documented these discussions in their service notes in HCSIS. The team must meet and rectify plans for the provision of services in accordance with Waiver Service Definitions.

It can be noted that 1 of the Participants receiving supported employment services no longer requires services per the supervisor at the participants place of employment. It appears that the Provider 'holds onto' consumers. Additionally, it is recommended that this Provider take

advantage of and connect consumers with natural resources, supports and services available within their community (ie: transportation).

Community Vocational Services, Inc. will complete the above determined remediation activities for Questions 22, 24 and 42 as well as submit their Plan for Corrective Action to include Plans to Prevent Recurrence and proof of remediation by February 10, 2018.

Appendices

Appendix A: Provider Self Assessment

Appendix B: Provider Sample Notification

Appendix C: MCI Review Spreadsheet

Appendix D: CAP