
QUALITY ASSESSMENT AND IMPROVEMENT: COMPREHENSIVE REPORT

Pennsylvania Office of Developmental Programs

Star Quality Enterprises

October 3, 2017

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Introduction

The purpose of the Comprehensive report is to compile the official findings from the desk and onsite reviews, face-to-face interviews and self-assessments, as applicable, that were completed for your agency as part of ODP's QA&I Process. This report will:

- Highlight those areas where the Provider is doing well related to person-centered services delivery and promising practices;
- Analyze performance in ODP's quality focus areas for the current QA&I cycle;
- Compare results of the desk and onsite reviews with the entity's self-assessment;
- Summarize those instances of non-compliance that were remediated during the onsite review;
- Outline issues of non-compliance expected to be remediated within 30 calendar days of report receipt;
- Recommend PPRs where compliance is below established thresholds of 86%; and
- Recommend improvement activities to be addressed during the remainder of the QA&I cycle, including systemic quality improvement projects to incorporate into QM Plans.

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.

ODP's vision is to continuously improve an effective system of accessible services and supports that are flexible, innovative and person-centered.

The Quality Assessment & Improvement Process is a way for ODP to evaluate our current system and identify ways to improve it for all individuals.

QA&I Summary

Per ODP's requirement, Star Quality Enterprises completed and forwarded to the Administrative Entity (AE) their Self-Assessment on August 31, 2017. Additionally, as required, Star Quality Enterprises submitted their Quality Management, Restrictive Procedure and Annual Staff Training policies to the AE. These policies and the completed provider Self-Assessment were reviewed by the AE as part of the desk review. The On-Site review portion was scheduled and occurred on September 26, 2017.

One administrator of Star Quality Enterprises was present for the entrance meeting which commenced at 11:00am. During the entrance discussion, the AE reviewed ODP's focus including Quality Management,

Employment, Communication, Restrictive Procedure Policy compliance and increased focus on Staff Training. The AE outlined what would be reviewed during the On-Site. The provider arranged for the individual interview portion to occur at approximately 12pm at the home of the individual which is also the location at which the on-site review took place. The provider sample reviewed consisted of one individual's records. The associated staff training records reviewed included three files. One individual interview was also completed.

Technical assistance was also provided during the On-site review by the AE on several topics including quarterly reviews of the Quality Management plan, checking exclusion lists, training documentation requirements, finalizing incidents in the EIM system and Certified Investigation Requirements.

Data Analysis and Performance Evaluation

During the On-Site review portion of the QA&I process, Star Quality Enterprises made available the required records as well as arranged for the one individual to be interviewed.

Findings:

Highlights and Provider Strengths:

- The residential home was cozy and the individual residing there seems to have made himself at home in the short time he has been there.
- Since he moved in approximately six weeks ago, Star Quality Enterprises has put forth respectable effort at enhancing the individual's community participation and sense of belonging. He has become part of a group of older adults that meets and exercise at the local YMCA; he has even been invited to celebrate birthdays with his new friends. The individual is especially enjoying the line dancing. This is notable because at his last residential provider he mostly sat in a wheelchair.
- To provide relief from a chronic health problem the individual is experiencing, Star Quality Enterprises has scheduled multiple medical appointments and tests and seems to be vested in promoting optimal health for the individual.

Areas for Corrective Action:

SPECIFIC FINDINGS OF NON-COMPLIANCE

- The Quality Management Plan that Start Quality Enterprises submitted for review was missing some of the required components including goals, target objectives, performance measures, data sources and actions to meet target objectives.
- Star Quality Enterprises was not able to provide documentation showing that it has screened employees monthly utilizing the three required exclusion lists.

- Two out of three staff did not have the necessary documentation for training on how to respond in cases of individual health, behavioral emergencies and crises. In addition to a corrective action plan this matter will also require a plan for prevention of recurrence.
- Two incidents were not finalized by Star Quality Enterprises within the required thirty days.
- Star Quality Enterprises did not possess the certificate for the Certified Investigator that carried out the investigation of an incident for the provider.

Suggestions for consideration of improvement:

- Before utilizing the services of a certified investigator, the AE recommends that Star Quality Enterprises obtain a copy of the CI's certificate to ensure that it has not expired. A copy of the certificate should be retained by Star Quality Enterprises.
- While Star Quality Enterprises' Restrictive Intervention plan meets requirements, the AE suggests that the provider reconsider its policy of not allowing the use of Restrictive Interventions. The rationale for this suggestion is that should the need arise to apply a restrictive intervention for the well-being of an individual, Star Quality Enterprises will not be able to do so as it would violate their own policy.
Of course, the use of restrictive interventions should be as a last resort. **Please note that the AE is not suggesting that Star Quality Enterprises permit the use of *restraints*. Restraints and restrictive interventions are not one in the same.**
- The AE suggests that Star Quality Enterprises consider using an annual training checklist for each employee on which dates of required trainings may be documented. This should make it easier to ensure all staff have completed the required trainings. The owner/CEO of the agency should also maintain documentation of her own trainings if she plans to continue to provide direct support services herself.
- The last suggestion is for Star Quality Enterprises to create a system to check incidents in EIM to be sure they have been finalized (or extended) within thirty days.

Appendices

- Star Quality Enterprises QA&I Tool
- Star Quality Enterprises CAP