
QUALITY ASSESSMENT AND IMPROVEMENT: COMPREHENSIVE REPORT

Pennsylvania Office of Developmental Programs

Legacy Treatment Services

September 25, 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, Legacy Treatment Services completed and forwarded to the Administrative Entity (AE) their Self-Assessment on August 9, 2017. Additionally, as required, Legacy Treatment Services 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 15, 2017.

Two administrators of Legacy Treatment Services were present for the entrance meeting which commenced at 9:00am. During the entrance discussion, the AE reviewed ODP's focus including Quality

Improvement, Employment, Communication, Restrictive Procedure Policy compliance and increased focus on Staff Training. Also noted was the change that the AEs were no longer reviewing the specific service billing history of the provider and On-Site is to occur on a 3-year cycle. The AE outlined what would be reviewed during the On-Site and potential timeframes for completion. The provider arranged for the individual interview portion to occur at the home of the participant being interviewed where the On-Site review also took place. The provider sample reviewed was two individual records. The associated staff training records reviewed included two files. One individual interview was also completed. Technical assistance was also provided during the On-site review by the AE on the topics Legacy requested including quarterly reviews of the Quality Management plan, checking exclusion lists, and Certified Investigation Requirements.

Data Analysis and Performance Evaluation

During the On-Site review portion of the QA&I process, Legacy Treatment Services made available all required records as well as arranged for the one individual to be interviewed. The process advanced without delays as Legacy Treatment Services was able to retrieve all additional information needed and clarify any questions as identified by the AE.

Findings:

Highlights and Provider Strengths:

- Legacy Treatment Services was fully prepared for the On-Site review; making available organized binders and carefully labeled agency policies and files. Both administrators were very knowledgeable of the participants they serve, the organizational flow of their charts and their agency practices. This made it easy to locate the necessary information to determine compliance with the QA&I tool.
- The feedback from the individual that was interviewed as part of the On-Site review was positive. The person was quite happy with the services he is receiving and is looking forward to becoming a permanent resident at the home.
- The AE witnessed the close relationship between the individual interviewed and the Legacy administrative staff whom are also providing direct support at the licensed respite home.
- It is evident that Legacy has taken a great deal of time getting to know both individuals to whom they provide service and have gone to great lengths to make them feel at home in their respite home. For example, in addition to assisting an individual with acclimating to his new environment Legacy also makes sure this individual, a refugee from an Asian nation, is regularly able to visit and interact with people from his own culture. Several times a month, they accompany him to restaurants and groceries in a nearby community that serve food from his native land.

Areas for Corrective Action:

- **Question # 7. The Provider has a Quality Management Plan (QMP) that reflects ODP's Mission, Vision and Values.** Legacy Treatment Services' Quality Management Plan was not dated with month and year. Legacy Treatment Services' Quality Management Plan did not indicate that it would be updated at least every two years. This was corrected on site. Legacy Treatment Services added the date of the plan and also a statement to indicate that the plan will be updated at least once every two years. No further action is required for this finding.
- **Question # 10. The Provider implements a policy/procedure to screen employees and contractors.** Legacy Treatment Services did not implement their policy to screen employees. They did not screen prior to employment or monthly thereafter. A corrective Action plan for remediation must be submitted to the AE within thirty days.

Appendices

- **Legacy Treatment Services QA&I Tool**
- **Legacy Treatment Services CAP**