# QUALITY ASSESSMENT AND IMPROVEMENT: COMPREHENSIVE REPORT

Pennsylvania Office of Developmental Programs

Nick's Home

January 16, 2018

# **Table of Contents**

Introduction	3
QA&I Summary	4
Data Analysis and Performance Evaluation	6
Appendices	7
Appendix A: AE On-site Data	
Appendix B: Analysis of Performance- Focus Areas	12
Appendix C: Comparative Analysis of Self-Assessment & Onsite Data	13

#### Introduction

The mission of ODP is to support Pennsylvanians with developmental disabilities to achieve greater independence, choice, and opportunity in their lives. ODP's 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. As part of ODP's quality management strategy, this QA&I process has been designed to be comprehensive, standardized, and measurable. The QA&I process is intended to:

- Follow an individual's experience throughout the system;
- Measure progress toward implementing "Everyday Lives: Values in Action;"
- Gather timely and usable data to manage system performance; and
- Use data to manage the service delivery system with a continuous quality improvement approach.

The purpose of the QA&I Comprehensive Report is to compile the findings from the desk review and onsite review, face-to-face interviews, and self-assessments, as applicable. Each provider entity then is able to utilize the data to continuously improve quality for ODP's vision of an effective system of accessible services and supports that are flexible, innovative, and person-centered. For each entity, the QA&I Comprehensive 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 Plan to Prevent Recurrences (PPRs) where compliance is below the 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.

ODP's quality management strategy is a comprehensive approach that includes quality planning, quality assurance, and quality improvement/enhancement. This QM strategy is developed and implemented to:

- Offer the highest quality services that promote choice and control in individuals' everyday lives.
- Safeguard the health and safety of individuals receiving services.
- Implement promising practices.
- Ensure program compliance with regulations.

ISAC recommendations for *Values in Action* are built on the values, goals, expectations, and aspirations of people with disabilities and their families. The recommendations are a guide for ODP to develop policy and design programs for people with disabilities, families, providers of service, and advocates who support people to have an everyday life. By utilizing the ISAC recommendations and data gathered from the QA&I process, providers are able to create systemic improvement projects and are able to incorporate improvement activities into their QM Plans. The current ISAC recommendations are as follows:

- 1. Assure Effective Communication
- 2. Promote Self-Direction, Choice, and Control
- 3. Increase employment
- 4. Support Families throughout the Lifespan
- 5. Promote Health, Wellness, and Safety
- 6. Support People with Complex Needs
- 7. Develop and Support Qualified Staff
- 8. Simplify the System
- 9. Improve Quality
- 10. Expand Options for Community Living
- 11. Increase Community Participation
- 12. Provide Community Services to Everyone
- 13. Evaluate Future Innovations Based on Everyday Lives Principles

The focus areas identified by ODP for this QA&I cycle are ensuring communication, employment, and quality management. Provider entity performance in these areas will be highlighted in this report.

#### **QA&I Summary**

Nick's Home, successfully submitted their QA&I Self-assessment on August 30, 2017. The self-assessment identified no areas of non-compliance. The Provider Checklist, Quality Management Plan, Restrictive Intervention Policy, and Annual Training plan were also submitted to the AE on August 30, 2017. The AE validated that all of the policies and procedures that were submitted with the provider checklist are in compliance with applicable regulations.

On December 19, 2017, the AE provided Nick's Home with a one-week notification email which included the provider's sample and a list of items that would be reviewed by the AE during the on-site review. The AE had difficulty scheduling an on-site with the Provider which is why only a one-week notice was provided.

The AE selected a sample of one, reviewed one set of individual records, and conducted one staff and one individual interview as part of the on-site review process. The individual in the sample is a Consolidated waiver recipient who is receiving licensed (6400) residential habilitation services.

The QA&I on-site review of Nick's Home occurred on December 27, 2017 at the provider's residential service location in Slatington, Pennsylvania. The on-site review began with the entrance interview which was attended by Joel Gilly (CEO), Madeline Fonzone (Program Specialist/Mother), and Jessica Pahountis (Lehigh County AE QA&I Lead). During the entrance interview, the AE provided an overview of the QA&I process and answered any provider questions in regards to the QA&I process. Nick's Home provided the AE with a brief description of their vision and mission for their agency, highlighted their quality improvement priorities, and asked questions in regards to behavioral support service changes. At the conclusion of the entrance interview, Joel Gilly provided the AE with files and binders containing all of Nick's Home's policies, procedures, and other supporting documentation that was utilized when completing the self-assessment. The AE began the on-site review process by reviewing all of the documentation required to answer the questions in the QA&I On-site Questions Tool for Providers.

Upon completing the QA&I On-site Questions Tool for Providers, the AE conducted an interview with staff member, James Wolfe, who was providing Residential Habilitation services to the consolidated waiver participant in the sample. It was evident from the interview process that James had been well trained on the ISP, including the individual's communication system and risk mitigation factors. James had reported that the individual is supported to engage in their preferred activities and outings (using the iPad, looking at family photos, sports and other physical activities). Additionally, James reported that he believes that the individual's residence is fully accessible to his needs and is also reflective of the individual's hobbies, interests, and personality.

The AE also conducted an interview of MCI#500113545 and his mother, as the individual is non-verbal and chose not to answer the majority of the questions asked. Necessary communication assistance (iPad) was offered at the time of the interview. The individual's mother reported that she is "very satisfied" with the residential habilitation services her son is receiving with Nick's Home. It was also reported that the individual's ISP is clear/understandable and the individual is able to decide where, when, and how supports are provided. Additionally, it was reported that the individual is able to spend time with visitors and friends when the individual wants and the individual is able to have alone time with friends and visitors. The residence was also reflective of the individual's hobbies, interests, and personality.

Upon completing the on-site review questions tool, a staff interview, and individual/family interview, the exit interview was conducted on December 27, 2017 with the same parties that were in attendance for the entrance interview. The AE noted that the provider's policies and procedures were very well written and were in compliance with all applicable regulations. Nick's Home also had extensive, thorough individual records which highlighted when Nick makes choices and any other positives that occurred throughout the day. Additionally, the AE noted that the provider was very organized in their preparation for the QA&I on-site process. The AE discussed with Nick's Home, areas in which they are showing promising practices. The AE then informed Nick's Home that they would not be required to complete any remediation at this time due to having no areas of non-compliance. The next steps in the QA&I process were then discussed and additional provider questions were answered by the AE.

#### Data Analysis and Performance Evaluation

Nick's Home had no areas of non-compliance and are not required to make any remediation at this time. Data for every QA&I question can be located in Appendix A of this document. The AE currently does not have any recommendations for the entity's system improvement, as Nick's Home appears to be providing high quality services to individuals with an intellectual disability and/or autism spectrum disorders.

The entity has policies and procedures which meet all 55 Pa Code Chapter 51 waiver regulations, as well as requirements established by ODP. Nick's Home has a staff training curriculum that extends well beyond the minimum requirements. Nick's Home also has extensive, thorough individual records which highlight individual strengths and decision making. Having a strong staff training curriculum, well-written policies and procedures, and thorough individual records are promising practices in which the entity excels.

As stated previously, Nick's Home had no areas of non-compliance for any of the focus areas (ensuring communication, employment, quality management) which were analyzed through the QA&I process. Data analysis of performance on focus areas is located in Appendix B of this document. The AE's onsite results and entity's self-assessment results reported congruent findings. Analysis of this data is located in Appendix C of this document.

# Appendix A

AE On-site Data: Questions Tool for Providers		
Question	Findings	Comments
Self-Assessment		'
The Provider completes an ann	ual QA&I self-assessment	
6. The provider completed its	Yes	Completed 8/30/2017
annual self-assessment using		
the ODP specified tool.		
<b>Quality Management</b> There are systemic efforts to co	ontinuously improve quality	
7. The Provider has a Quality	Yes	
Management Plan (QMP) that reflects ODP's Mission, Vision, and Values.	103	
8. The Provider reviews and	Yes	There is documentation to show
evaluates performance data in selecting priorities for the QMP.		that the provider reviewed and evaluated performance data in selecting priorities for the QMP.
9. The Provider analyzes and	Yes	There is documentation to show
revises the QMP every 2 years.		that the Provider analyzes and revises the QMP every 2 years.
Person-Centered Planning, Ser The system of support is straigh	<u> </u>	
10. The Provider implements a	Yes	The provider has a
policy/procedure to screen employees and contractors.		policy/procedure that meets all criteria established and there is evidence that it is being implemented.
11. The Provider documents grievances in accordance with regulation.	Yes	The grievances were completed in accordance with regulation.
12. The Provider has a policy that addresses restrictive interventions.	Yes	The provider has a policy that includes all required criteria.
13. In residential habilitation,	Yes	1/1 records reviewed.
the individual has a signed		The provider is currently
department-approved room		providing residential habilitation
and board contract.		to one individual in the sample.  A department-approved room
		and board contract exits, is
		signed, and completed annually.
Qualified Providers		
The individual's Provider(s) med	et necessary training requireme	ents
14. Staff receive training to meet	Yes	1/1 records reviewed.
the needs of the individual they		

support as identified in the current, approved Individual Support Plan (ISP) before providing services.		Training records indicate that staff received training on the current, approved ISP prior to beginning work with the individual.
15. If a provider has any new hire staff, the new hire staff received training to meet the needs of the individual they support as identified in the current, approved ISP before providing services to the individual.	Yes	1/1 records reviewed. Training records indicate that staff received training on the current, approved ISP for the person they support prior to beginning work with the individual.
16. The provider has an annual training plan that meets all requirements.	Yes	The provider has an annual training plan that meets all requirements.
17. The provider and the provider's staff completed all components of the Annual Training plan as required.	Yes	1/1 records reviewed were in compliance. The provider records indicate completion of the annual training plan.
18. Provider staff receive annual incident management training on preventing, recognizing, reporting, and responding to incidents and assuring a participant is safe.	Yes	1/1 records reviewed were in compliance. The provider records indicate completion of the annual incident management training.
19. The staff receive training on the Provider's policy/procedure on how to respond in cases of individual health, behavioral emergencies, and crises.	Yes	1/1 records reviewed were in compliance. The provider records indicate completion of the annual training on how to respond to individual health, behavioral emergencies and crises.
20. The staff receive training on the Provider's Emergency Disaster Response plan that addresses individual's safety and protection, communications and/or operational procedures.  Person-Centered Planning, Ser	Yes	1/1 records reviewed were in compliance. The provider records indicate that staff were trained on the Emergency Disaster Response plan.
The individual is supported in developing their own ISP, including involvement of people chosen by the individual		
21. The provider participates in the development of the ISP.	Yes	1/1 records reviewed. 1/1 records indicate ISP signature sheet indicates that a provider representative

		participated in the ISP Annual
22. The provider documents delivery of services/supports in the type, scope, amount, frequency and duration specified in the ISP.	Yes	Meeting.  1/1 records reviewed.  The daily documentation and progress notes reflect that services/supports were provided in accordance with the individual's ISP.
23. The Provider continued to provide the authorized services to ensure continuity of care during transition.	NA	0/0 records reviewed. The provider did not transition any individuals to a new provider for the previous year.
24. If a progress note indicates lack of progress in achieving an outcome, the provider progress note indicates what actions have been taken.	Yes	1/1 records reviewed. The progress notes reviewed indicate action taken to address lack of progress.
25. The individual receives employment supports from the provider.	NO	0/0 records reviewed. The individuals do not receive employment supports from the provider.
26. The individual is supported in exploring employment opportunities through job development and assessment.	NA	0/0 records reviewed. The individuals do not receive employment supports from this provider.
27. The employment provider supports the individual in obtaining employment through job interviewing.	NA	0/0 records reviewed. The individuals do not receive employment supports from this provider.
28. The employment provider supports the individual in maintaining employment through job support and followalong services.	NA	0/0 records reviewed. The provider is not a provider of employment services.
29. The residential provider supports the individual to maintain employment by facilitating transportation.	Yes	1/1 records reviewed. The individual is not employed for 1 hour per week. Records indicate that the Provider facilitated transportation for the individual to maintain employment.
Person-Centered Planning, Service Delivery & Outcomes The individual is supported to communicate		
30. Staff are trained on the person's communication plan and/or formal communication system.	Yes	1/1 records reviewed. The assigned staff's training records indicate that training was received.

31. The provider provides communication assistance as indicated in the ISP.	Yes	1/1 records reviewed.  The daily documentation and progress notes reflect how the provider implemented the communication assistance.
32. The provider has been entering the individual's progress related to their communication outcomes into the progress notes.	Yes	1/1 records reviewed.  Daily documentation and progress notes show the progress or lack of progress has been documented as it related to the communication outcome.
33. The provider serves one or more Consolidated and/or P/FDS waiver participants who are deaf.	NO	0/0 records reviewed. The provider is not currently serving any individuals.
34. The provider ensures that one or more of the provider's administrative staff have viewed ODP's webinar.	NA	0/0 records reviewed. The provider does not serve any individuals who are deaf.
35. The provider ensures that provider staff who serve a deaf waiver participant(s) have viewed ODP's webinar.	NA	0/0 records reviewed. The provider does not serve any individuals who are deaf.
Health & Welfare		
The individual's health, safety, 36. The provider implements the individual's back-up plan as specified in the ISP.	and rights are protected  NA	O/O records reviewed.  A back-up plan was not required for the service and there were no events that occurred which required the implementation of a back-up plan.
37. If an individual's back-up plan is not implemented as designed, an incident report of neglect was submitted.	NA	O/O records reviewed.  A back-up plan was not required for the service and there were no events that occurred which required the implementation of a back-up plan.
38. The provider ensures the replacement of an individual's lost or damaged property in accordance with regulation.	NA	0/0 records reviewed. The individuals did not have any lost or damaged property.
39. The provider finalizes incidents within 30 days.	NA	0/0 records reviewed.  The provider had no incidents for the timeframe reviewed.
40. The provider offered victim's assistance to the individual as appropriate.	NA	0/0 records reviewed.  The provider did not have any individuals in the sample with an

		incident for the timeframe reviewed.
41. The provider implemented the corrective action for each individual's incidents.	NA	0/0 records reviewed.  The provider had no incidents for the timeframe reviewed.
42. The provider reported all critical incidents.	NA	1/1 records reviewed.  There is no documentation to indicate that any incidents occurred that were required to be reported.
43. The provider reviews and analyzes incidents at least quarterly.	Yes	The provider's review and analysis was completed at least quarterly for the previous year and included a review of medication errors (1) and restraints (0).
44. The provider's peer review process to review the quality of investigations was completed and documented.	NA	There have been no Certified Investigations completed by the Provider.
45. The provider implements follow-up recommendations from the Certified Investigation peer review process.	NA	There have been no Certified Investigations completed by the provider.
46. The provider completes all health care appointments, screenings, and follow-ups as prescribed.	Yes	1/1 records reviewed. Required and recommended appointments occurred.
47. All required investigations are completed by a Department certified incident investigator.	NA	There were no investigations.
48. If the individual has a dual diagnosis, the individual is receiving needed mental health (MH) services.	Yes	1/1 records reviewed. The provider ensures that the individual is receiving the needed mental health services as directed in the ISP.
49. The provider promotes wellness.	Yes	1/1 records reviewed. The provider has made the listed health promotion options available to the individual.

### Appendix B



# Appendix C

Question	Onsite Findings	Self-Assessment Findings
Quality Management		
There are systemic efforts to con	ntinuously improve quality	
The Provider has a Quality Management Plan (QMP) that reflects ODP's Mission, Vision, and Values.	Yes	Yes
The Provider reviews and evaluates performance data in selecting priorities for the QMP.	Yes	Yes
The Provider analyzes and revises the QMP every 2 years.	Yes	Yes
Person-Centered Planning, Serv	rice Delivery & Outcomes	
The system of support is straight	forward	
The Provider implements a policy/procedure to screen employees and contractors.	Yes	Yes
The Provider documents grievances in accordance with regulation.	Yes	Yes
The Provider has a policy that addresses restrictive interventions.	Yes	Yes
In residential habilitation, the individual has a signed department-approved room and board contract.	Yes	Yes
<b>Qualified Providers</b>		
The individual's Provider(s) meet	t necessary training requiremer	nts
Staff receive training to meet the needs of the individual they support as identified in the current, approved Individual Support Plan (ISP) before providing services.	Yes	Yes
If a provider has any new hire staff, the new hire staff received training to meet the needs of the individual they support as identified in the current, approved ISP before providing services to the individual.	Yes	Yes
The provider has an annual training plan that meets all requirements.	Yes	Yes

The provider and the provider's staff completed all components of the Annual Training plan as required.	Yes	Yes
Provider staff receive annual incident management training on preventing, recognizing, reporting, and responding to incidents and assuring a participant is safe.	Yes	Yes
The staff receive training on the Provider's policy/procedure on how to respond in cases of individual health, behavioral emergencies, and crises.	Yes	Yes
The staff receive training on the Provider's Emergency Disaster Response plan that addresses individual's safety and protection, communications and/or operational procedures.	Yes	Yes
Person-Centered Planning, Ser	vice Delivery & Outcomes	
The individual is supported in de	eveloping their own ISP, including	g involvement of people chosen
by the individual		
The provider participates in the development of the ISP.	Yes	Yes
The provider documents delivery of services/supports in the type, scope, amount, frequency and duration specified in the ISP.	Yes	Yes
The Provider continued to provide the authorized services to ensure continuity of care during transition.	NA	NA
If a progress note indicates lack of progress in achieving an outcome, the provider progress note indicates what actions have been taken.	Yes	Yes
The individual receives employment supports from the provider.	NA	Yes
The individual is supported in exploring employment opportunities through job development and assessment.	NA	Yes

NA	Yes
NA	Yes
Yes	Yes
•	
	Yes
Yes	Yes
Yes	Yes
NO	NO
NA	NA
NA	NA
and rights are protected	
NA	Yes
NA	Yes
	Yes  Pvice Delivery & Outcomes Communicate  Yes  Yes  NO  NA  NA  NA  And rights are protected  NA

The provider ensures the replacement of an individual's lost or damaged property in accordance with regulation.	NA	Yes
The provider finalizes incidents within 30 days.	Yes	Yes
The provider offered victim's assistance to the individual as appropriate.	NA	Yes
The provider implemented the corrective action for each individual's incidents.	NA	Yes
The provider reported all critical incidents.	NA	Yes
The provider reviews and analyzes incidents at least quarterly.	Yes	Yes
The provider's peer review process to review the quality of investigations was completed and documented.	NA	Yes
The provider implements follow-up recommendations from the Certified Investigation peer review process.	NA	Yes
The provider completes all health care appointments, screenings, and follow-ups as prescribed.	Yes	Yes
All required investigations are completed by a Department certified incident investigator.	NA	Yes
If the Individual has a dual diagnosis, the individual is receiving needed mental health (MH) services.	Yes	Yes
The provider promotes wellness.	Yes	Yes