
QUALITY ASSESSMENT AND IMPROVEMENT: COMPREHENSIVE REPORT

Pennsylvania Office of Developmental Programs

Name of Reviewed Entity: Precious Lives Home Care, Inc.

Date(s) of Onsite Review: November 20, 2017

Date of Report: December 20, 2017

Onsite Review conducted by Philadelphia IDS

Name(s) of QA&I Review Team: Annette Murray, DBHIDS Program
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Introduction

This comprehensive report contains a detailed analysis of the Office of Developmental Programs (ODP) Quality Assessment & Improvement (QA&I) process for **Precious Lives Home Care, Inc.** This report will include the official findings of the desk review and on-site review processes conducted earlier this year by your assigned administrative entity, Philadelphia Intellectual disAbility Services.

The ODP QA&I Process for providers, which replaced the ODP Provider Monitoring process on July 1, 2017, is one piece of a comprehensive quality management review designed to evaluate the supports and services offered by county Administrative Entities, Supports Coordination Organizations, and Provider agencies across the Commonwealth of Pennsylvania. The purpose of the revised process, as stated by ODP, is to eliminate unnecessary duplication across Commonwealth and county review procedures, to allow more time to focus on individual experiences and quality improvement, to improve methods of collecting and reporting useful data in a timely manner, and to foster collaborative partnerships and opportunities for technical assistance and shared learning.

Upon completion and approval of this comprehensive report, the results are shared with ODP in order to assist with the evaluation of the current system of supports, and to identify ways to improve the system for all individuals and key stakeholders. Additionally, QA&I assists with data collection that measures Consolidated and Person/Family Directed Support waiver performance measures, compliance with Title 55 PA Code Chapter 51 regulations, and compliance with the Medicaid Waiver Provider Agreement.

ODP's focus areas for this year's statewide QA&I review are consistent with the desired outcomes of the 2017 waiver renewals and the ODP quality management strategy. These focus areas include but are not limited to the following:

- Families with infants and toddlers and people with Autism get the support they need
- People will be connected with their community and increase community participation
- People will live with people they like and who care about them
- People will be physically and mentally healthy
- Assuring effective communication
- Increasing employment
- Ensuring individuals are free from abuse, neglect, and exploitation
- Ensuring that people with complex needs have the support they need

Quality Assessment & Improvement Summary

The steps of the ODP QA&I process are inclusive of the following procedures:

Self-Assessment:

All providers complete the self-assessment on an annual basis. Providers are expected to remediate issues that are discovered during their self-assessment within 30 days, and to engage in quality improvement activities based on the results of self-assessment. Precious Lives Home Care, Inc. successfully completed their self-assessment on time, before the deadline prescribed by ODP. The provider's self assessment was submitted on 8-31-2017. In reviewing the provider's self assessment, most answers were consistent with findings of the onsite reviewer, except for Q.10.

As for Q.10, ODP recommends the provider should terminate the staff/contractor immediately and void all claims connected to the staff/contractor if appearing on an exclusion list. This policy/procedure should be added to the Exclusion List Policy.

Some questions were not applicable to the provider, since they only plan to provide Companion Service at this time.

Desk Review of Providers:

The assigned Administrative Entity will conduct a desk review of providers that are assigned for on-site review prior to the date of on-site. This desk review includes an analysis of the provider agency's Quality Management Plan, the Annual Training Plan, and the Restrictive Intervention Policy, which are submitted to the AE by the provider upon completion of the self-assessment. The desk review also consists of a review of data collected from Home & Community Services Information System (HCSIS), the Enterprise Incident Management system (EIM), and the Individual Support Plans (ISPs) of the individuals selected by the assigned AE for the onsite review sample.

The Desk review of the provider's Annual Training Plan does meet ODP Guidelines. Additionally, the reviewer suggested on-line training from Philadelphia Coordinated Health Care (PCHC) which may be helpful trainings on various topics like Challenging Behaviors, Understanding Aggression, Autism, Positive Approaches, etc. This is not an ODP requirement but it can be helpful.

Regarding the provider's Restrictive Intervention Policy, it is comprehensive; however, the reviewer recommends that the words "Client" and "Patient" be changed to "Individual " in the policy. This is in keeping with "Everyday Lives" philosophy and "people first" language as to how to refer to a person who is receiving services from an ODP provider.

AE Onsite Review of Providers:

Philadelphia IdS conducted the onsite review of **Precious Lives Home Care** on November 20, 2017. The process began with an Entrance meeting, held on the first day of the scheduled onsite review. A copy of the Entrance meeting signature sheet documenting all attendees is included in the appendices of this report. Discussion during the entrance meeting included introductions, a general overview of the QA&I process, including the mission, vision and quality improvement priorities of ODP, IdS, and the reviewed provider, and a discussion of the specific details of the onsite process.

Before being approved by ODP to be a provider for companion services, **Precious Lives Home Care** has been providing non-medical home health care services under the Office of Long Term Living Waiver Program (OLTL) as well as private insurances. The CEO was well prepared for the QA&I on-site review.

There were not any individuals selected as a part of this provider's sample, because the provider does not yet support individuals through the ODP waivers. The CEO and this reviewer discussed ways to obtain referrals from the SCO's. The importance of checking ISP's authorizations(s) before starting service was also discussed.

The Exit meeting of the onsite review took place occurred on the same day as the Entrance meeting. A copy of the Exit signature sheet documenting all attendees is included in the appendices of this report. Topics of discussion during the Exit meeting included introductions, an overview of the process from the perspective of the reviewer and the reviewed provider, an overview of the findings documented during the review, and an overview of the comprehensive report and the corrective action process. The CEO is prepared to hire staff for any new referrals she receives. She seems quite appreciative of recommendations this reviewer discussed with her.

Data Analysis and Performance Evaluation

Precious Lives Home Care seems committed to provide quality service for individuals who have a disability, and may need assistance with daily living activities and being able to participate in community events/activities with a companion.

Item(s) requiring remediation with 30 days:

- Regarding Q.10, The provider should revise the exclusion list policy to include that ODP recommends the provider should terminate the staff/contractor immediately and void all claims connected to the staff/contractor if they appear on an exclusion list.

Recommendations for entity's system improvement, including those things that rise to the level of needing attention at a broader level including those areas that fall below 86% of compliance:

- No area identified in the CAP requires a plan to prevent recurrence of non-compliance.
- Regarding the agency's Quality Management Plan, they have up to 2 years to collect data, measure performance and analyze findings. It would be very beneficial to conduct a satisfaction survey with individuals and families receiving companion services, as well as documenting grievances/complaints (if any) periodically. It is important that the provider is aware that this type of data could be continually gathered, to gain feedback on service delivery and measure outcomes.
- In the event of incident(s) requiring investigation, it is important that the provider obtain a list of certified investigators from the Philadelphia AE office to determine who they will contract with in the event an investigation is needed.

Appendices

Appendix A: Corrective Action Plan

Appendix B: Entrance Signature Sheet

Appendix C: Exit Signature Sheet

Appendix D: MCI Review Spreadsheet