
QUALITY ASSESSMENT AND IMPROVEMENT: COMPREHENSIVE REPORT

Pennsylvania Office of Developmental Programs

Southwinds, Inc.

September 21, 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, Southwinds, Inc. completed and forwarded to the Administrative Entity (AE) their Self-Assessment on August 28, 2017. Additionally, as required, Southwinds, Inc. 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 19, 2017. During the entrance discussion, the AE reviewed ODP's focus including Quality Management, 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 approximately 3:30/4:00pm at Southwinds, Inc.'s administrative office where the On-Site review took place. The provider sample reviewed was five (5) individual records. The associated staff training records reviewed included twenty-five (25) files. One individual interview was also completed.

Data Analysis and Performance Evaluation

During the On-Site review portion of the QA&I process, Southwinds, Inc. made available all required records as well as arranged for the one individual to be interviewed. The process went very smoothly as Southwinds, Inc. staff were able to retrieve all additional information or clarification needed as identified by the AE.

Highlights and Provider Strengths:

- Southwinds, Inc.'s records were organized and all administrative staff were very helpful in explaining the organization of the training and individual records.
- The training records were organized per each staff individual and within contained a clear structure. It was evident that on-going training is occurring for Southwinds, Inc.'s staff not only for required training but also additional staff education and development was routinely provided.
- Quality Management Plan strongly reflected goal and mission of ODP.
- One individual was interviewed by the AE as part of the QA&I process. The individual stated that she is 'very satisfied' with her services through Southwinds, Inc. She discussed liking living with the other individuals in her home and the activities she chose. She indicated having choice in her activities, how she spends her money and the routine of her day.

Areas for Corrective Action:

- **Question # 35:** The provider implements the individual's back-up plan as specified in the ISP. For individual MCI # 001381285, there was evidence that his AIS did not occur as required in Frequency and Duration. There was no documentation the back-up plan per the ISP was followed. It was discussed during the on-site the need for the AIS being the individual's retirement and need for staffing during the day. Normally, the individual receives 1:4 staffing and the ratio did not fall below this number, but did not always receive the 1:1. The discussion was to edit/update the back-up plan in the ISP to reflect the actual needs/ plan for this specific individual.
- **Question # 36:** If an individual's back-up plan is not implemented as designed, an incident report of neglect was submitted. For individual MCI # 001381285, (above) when the back-up plan was not implemented, no incident report of neglect was filed. The provider plans on filing this report.

- **Question # 38:** The provider finalizes incidents within 30 days. Per the AE review of EIM for the past 6 months, Southwinds, Inc. did not finalize all incidents within 30 days as required.
- **Question # 44:** The provider implements follow-up recommendations from the Certified Investigation peer review process. Southwinds, Inc. did routinely document their peer review process. However, there was not documentation that suggestions/ recommendations were implemented.

Suggestions for consideration of improvement:

- Pertaining to Southwinds, Inc.'s annual training curriculum and specifically the required topic of *Identification and prevention of abuse, neglect and exploitation of a participant*, the curriculum was a little unclear about what was covered. Southwinds, Inc. showed that it is a part of their incident management training and focused mainly on the reporting of abuse and neglect. The AE suggested that more focus be on the prevention of abuse and having the training curriculum show this aspect more clearly.

Appendices

- Southwinds, Inc. QA&I Tool
- Southwinds, Inc. Corrective Action Plan (CAP)