

Report to QIA Committee for State Transition Plan Data Analysis

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Introduction: We are continuing to gather data regarding provider compliance with the Integrated Services Rule criteria. Analysis of the reviews conducted by Kepro to date revealed the following limitations and delimitations:

Limitations: not all providers (13 agencies, 39 settings) have had their first KEPRO review of the Integrated Services Rule criteria. All of these reviews will be completed by December 31, 2018. Those not done include:

Non-Residential	ARC 3 Rivers	Madison
	EastRidge	Grove Center, Coumo Rd
		Morgan County
		Water Street
	Hancock Co SW	Weirton HCOC
	Healthways	BCOC North
		Cove Road
	Hopewell	Cross Lanes
	MidValley	DH New Martinsville
	REM Boaz	
	REM Follensbee	
	REM N Martinsville	(rcd 9/19/18 no deficiencies)
	Westbrook	Parkersburg
		Spencer

Residential	ARC of Harrison,	348 Grand Ave 121 Matthew St 122 Matthew St 1751 15 th Street 264 Locust St 1420 Alpha St
	EastRidge	Hoffmaster I Hoffmaster II
	Healthways	Cove Rd Greenbrier Manor Shiloh
	REM	Church Ave
	Russell Nesbitt	231 Fulton 120 Euclid 413 Fulton Frazier Run 134 Euclid 233 Fulton 513 Fulton 517 Fulton 529 Fulton T29 Fulton Rear Storch
	Starlight	23 rd St

Westbrook Stella I
Westbrook Stella II

Delimitations: Reviews are by different reviewers.

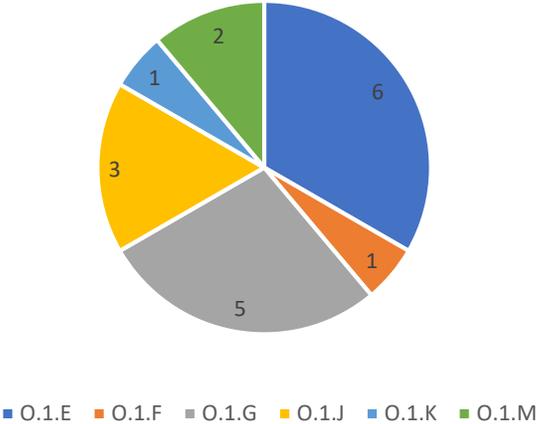
Tags Cited: The total number of tags cited was less than first time (Non-Residential 2017=174 and 2018=14; and Residential 2017=81 and 2018=13) and the tags cited were not as scattered throughout the 5 criteria.

Tags cited during first KEPRO review (information received as of 9/17/18) N=112

Non-Residential N=64

<u>Review Citation</u>	<u>Number of Providers</u>	<u>% of Providers</u>
O.1.E	6	9% =.093
O.1.F	1	2% =.015
O.1.G	5	8%=.078
O.1.J	3	5%=.046
O.1.K	1	2%=.015
O.1.M	2	3%=.031
O.2.B	2	3%=.031
O.3.E	4	6%=.062
O.4.A	1	2%=.015
O.4.B	1	2%=.015
O.4.E	2	3%=.031
O.5.A	1	2%=.015
R.5.A	1	2%=.015
R.5.B	1	2%=.015

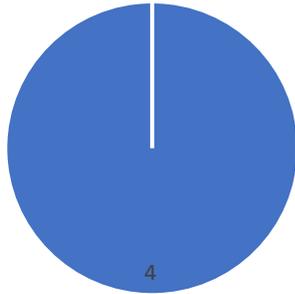
Provider Citations from First Kepro Reviews as of
September 2018
for 42CFR 441.301(c)(4)(i)/441.710 (a)(1)(i)/441.530(a)(1)(i)



Provider Citations from First Kepro Reviews as of
September 2018
for 42CFR 441.301(c)(4)(ii)/441.710
(a)(1)(ii)/441.530(a)(1)(ii)



Provider Citations from First Kepro Reviews as of
September 2018
for 42CFR 441.301(c)(4)(iii)/441.710
(a)(1)(iii)/441.530(a)(1)(iii)



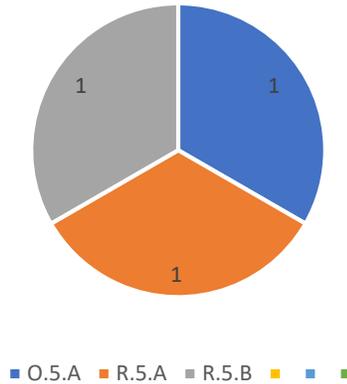
■ O.3.E ■ ■ ■ ■ ■

Provider Citations from First Kepro Reviews as of
September 2018
for 42CFR 441.301(c)(4)(iv)/441.710
(a)(1)(iv)/441.530(a)(1)(iv)



■ O.4.A ■ O.4.B ■ O.4.E ■ ■ ■

Provider Citations from First Kepro Reviews as of
September 2018
for 42CFR 441.301(c)(4)(v)/441.710
(a)(1)(v)/441.530(a)(1)(v)



Residential N=48

<u>Review Citation</u>	<u>Number of Providers</u>	<u>% of Providers</u>
O.1.G	3	6%=.062
O.1.H	3	6%=.062
O.1.I	3	6%=.062
O.2.G	1	2%=.020
O.2.G.i	1	2%=.020
O.2.G.v	1	2%=.020
O.3.A.ii	1	2%=.020
O.3.A.iii	1	2%=.020
O.3.F.ii	1	2%=.020

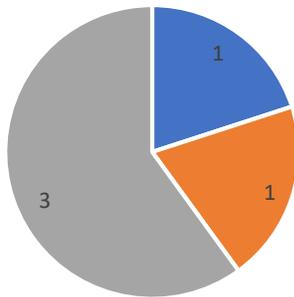
O.3.F.iii	1	2%=.020
O.3.G.i	1	2%=.020
O.3.G.iv	1	2%=.020
R.1.B.i	3	6%=.062

Provider Citations from First Kepro Reviews as of
September 2018 For
42CFR441.301(c)(4)(i)/441/710(a)91(i)/441/530(a)91(i)



■ O.1.G ■ O.1.H ■ O.1.I ■ R.1.B.i ■

Provider Citations from First Kepro Reviews as of
September 2018
for 42CFR 441.301(c)(4) (ii)/441.710
(a)(1)(ii)/441.530(a)(1)(ii)



■ O.2.G ■ O.2.G.i ■ O.2.G.v ■

Provider Citations from First Kepro Reviews as of
September 2018
for 42CFR 441.301(c)(4) (iii)/441.710
(a)(1)(iii)/441.530(a)(1)(iii)



■ O.3.A.ii ■ O.3.A.iii ■ O.3.F.ii ■ O.3.F.iii ■ O.3.G.i ■ O.3.G.iv

NOTE:

SOME PROVIDERS HAD MULTIPLE SETTINGS. EACH WAS ENTERED IN THE DATABASE INDEPENDENTLY, SINCE CITATIONS VARIED AMONG THESE SETTINGS.

ALL DATA WAS ACQUIRED THROUGH ON SITE SURVEYS/REVIEWS OF SETTINGS. WHILE SETTINGS NOT FOUND IN COMPLIANCE WILL RECEIVE/RECEIVED FOLLOW-UP REVIEWS, THE RESULTS OF THESE REVIEWS ARE NOT INCLUDED IN THIS ANALYSIS.

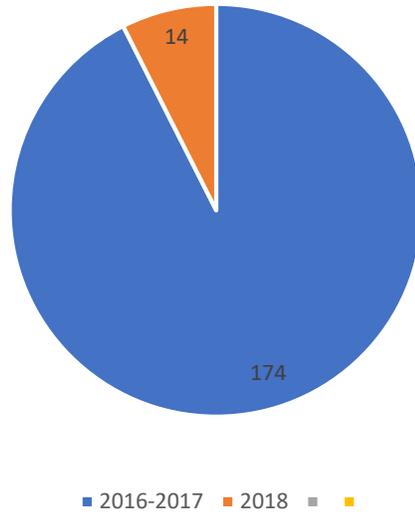
APPENDIX A INCLUDES A LIST OF TAG NUMBERS (i.e. O.1.A et al) AND THEIR DESCRIPTIONS.

SUMMARY/ABSTRACT

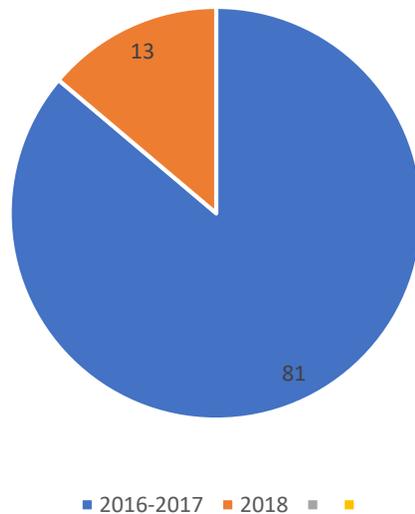
- I. There were no tags which were cited more than 9% in 2018.
- II. Fewer tags were cited by Kepro than in the initial review in 2016-2017.

Non-Residential tags cited 2016/2017=174 and 2018=14; and Residential tags cited 2017=81 and 2018=13.

Number of Discrete Non-Residential Tags Cited per Year



Number of Discrete Residential Tags Cited per Year



- III. The majority (6 of 12 or 46%) of tags cited under non-residential are found under the first of the five sections of the Rule: *1. The setting is integrated in and supports full access of individuals receiving Medicaid*

HCBS to the greater community, including opportunities to seek employment and work in competitive integrated settings, engage in community life, control personal resources, and receive services in the community, to the same degree of access as individuals not receiving Medicaid HCBS. 42 CFR 441.301(c)(4)(i)/441.710(a)(1)(i)/441.530(a)(1)(i)

Conclusion: Non-residential settings still have some problems with community integration and maintaining settings in an age appropriate manner.

- IV. The majority (5 of 13 or 38%) of tags cited under residential are found under the third of the five sections of the Rule: *3. The setting ensures an individual's rights of privacy, dignity, and respect, and freedom from coercion and restraint. 42 CFR 441.301(c)(4)(iii)/441.710(a)(1)(iii)/441.530(a)(1)(iii)*

There were 3 tags cited in residential that were cited in 6% of settings. All of these settings were homes owned by one provider.

Conclusion: There was much progress. With one outlier, all residential settings are in full or almost full compliance.

Next Steps Recommended:

The QA Sub Committee should reconvene to determine what areas of the 2018 data, when it is completed, should be examined for trends and training issues. Any needs for increased monitoring should also be identified and addressed.

Appendix A

Non-RESIDENTIAL

Individuals receive HCBS in an area of the setting that is fully integrated with individuals not receiving Medicaid HCBS. O.1.E

The setting is in a community/building located among other residential buildings, private businesses, retail businesses, restaurants, doctor's offices (to facilitate interaction with the greater community). O.1.F

The setting encourages visitors or other people from the greater community (aside from paid staff) to be present. There is evidence that visitors have been present at regular frequencies. (For example, customers in a pre-vocational setting).

Guidance: visitors greet/acknowledge individuals receiving services with familiarity when they encounter them; visiting hours are unrestricted; the setting otherwise encourages interaction with the public). O.1.G

The setting provides individuals with contact information, access to and training on the use of public transportation, such as buses, taxis, etc., and these public transportation schedules and telephone numbers are available in a convenient location. O.1.J

Alternatively where public transportation is limited, the setting provides information about resources for individuals to access the broader community, including accessible transportation for individuals who use wheelchairs. O.1.K

The setting is physically accessible, including access to bathrooms and break rooms, and appliances, equipment, and tables/desks and chairs are at a convenient height and location, with no obstructions such as steps, lips in a doorway, narrow hallways, etc., that may limit individuals' mobility in the setting. O.1.M

The setting options offered include non-disability-specific settings, such as competitive employment in an integrated public setting, volunteering in the community, or engaging in general non-disabled community activities such as those available at a YMCA. O.2.B

The setting offers a secure place for the individual to store personal belongings. O.3.E

There are no gates, Velcro strips, locked doors, fences or other barriers preventing individuals' entrance to or exit from certain areas of the setting. O.4.A

The setting affords a variety of meaningful non-work activities that are responsive to the goals, interests and needs of individuals.

Guidance: Does the physical environment support a variety of individual goals and needs (for example, does the setting provide indoor and outdoor gathering spaces; does the setting provide for larger group activities as well as solitary activities; does the setting provide for stimulating as well as calming activities?)

O.4.B

The setting posts or provides information on individual rights.
O.4.E

The setting posts or provides information to individuals about how to make a request for additional HCBS, or changes to their current HCBS. O.5.A

The setting policy/procedure assures individual choice regarding the services, provider and settings and the opportunity to visit/understand the options. R.5.A

The setting policy/procedure affords individuals the opportunity to regularly and periodically update or change their preferences. R.5.B

RESIDENTIAL

Visiting hours are posted. O.1.G

Bus and other public transportation schedules and telephone numbers are posted in a convenient location. O.1.H

The individuals have access to materials to become aware of activities occurring outside of the setting. O.1.I

Individuals have full access to the community. O.2.G

Individuals come and go at will. O.2.G.i

O.2.G.v

The telephone or other technology device is in a location that has space around it to ensure privacy. O.3.A.ii

Individuals' rooms have a telephone jack, WI-FI or ETHERNET jack. O.3.A.iii

The individual can close and lock his/her bedroom door. O.3.F ii

The individual can close and lock the bathroom door. O.3.F.iii

Cameras are present in the setting, in individual personal living spaces. O.3.G.i

Staff only use a key to enter a personal living area or privacy space under limited circumstances agreed upon with the individual. O.3.G.iv

Individuals work in integrated community settings. R.1.B.1 {Policy}