Division of Developmental Disabilities

District 1 October 17, 2018
District 2 October 23, 2018
District 3 November 7, 2018

Service Coordination & Provider Meeting 4th Quarter 2018



Agenda

- Welcome & Introductions
- Distribution of District Contact Information
- Rate Rebase & OAP Redesign Overview
- New Provider Bulletins
- DD & Vocational Rehabilitation
- Biennial ICAP Project
- Post Payment Claims Reviews
- ISP Meeting Preparation
- State Transition Plan STP
- Alternative Compliance -vs- Exception Requests
- > GER
- Open Discussion



Rate Rebase & OAP Redesign

PHASE I

- ➤ Finalized Rates, Services Definitions Distributed to Provider Advisory Group (PAG) on 7-19-18
 - DD been working with CMS regarding Technical Assistance for Shared Living
 - ➤ Public Comment hopeful November 2018

PHASE II

- > OAP Stakeholder Groups
 - > Clinical
 - Family/Advocacy
 - > Providers
- ➤ Biennial ICAPS starting in November 2018



New Provider Bulletins

- # 18-06 Sub-Contracting for Direct Provision of DD Services Issued 8/1/18
 - ➤ Upon approval of new NAC Shared Living only Wavier Service sub-contracting allowed
- > # 18-05 Title 403 Regulations Issued 7-24-18
 - > Effective 7-16-18
 - > DD Providers given until 10-16-18 to update Policy and Procedures



DD & Vocational Rehabilitation

- ➤ Interim Process ended 9-30-18
- Supported Employment (Indv. & Follow-Along) requests on or after 10-1-18, must be to VR, DD can not fund
- > VR is serving people off of their Waiting List based on date of application



Biennial ICAP Project

- Providers identifying Agency Liaisons now
- ➤ DD to begin again November 2018
- The ICAP has high inter-rater reliability
- DDD has no imminent plans to change/replace the ICAP
- > ICAP will play a critical role in rate transformation
- > 1,744 ICAP Renewals were completed in 2017
- > 2,700 ICAP Renewals must be completed prior to October 1, 2019
- > DSS conducts approximately 200 Initial ICAPs annually
- CCS conducts approximately 200 Change Request ICAPs annually
- CCS will conduct ICAP Renewals and Change Request ICAPs



ICAP Renewals: Service Coordinators & Provider Liaisons

Service Coordinator

- Upon request the Service Coordinator will provide the ICAP respondent two names of potential interviewees;
- Service Coordinators will be responsible for gathering required documentation for submission to the ICAP respondent. This change in protocols is premised upon the assumption that the SC will know the person well and be familiar with documentation that best informs the assessment process;

Agency Liaison

- Upon request the Agency Liaison will submit the names of two potential interviewees to the ICAP respondent
- The Agency Liaison will collaborate with the ICAP respondent to determine the two best people to interview
- The Agency Liaison will schedule the interviews and notify the ICAP respondent

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Quality Assurance: Preserving ICAP Integrity

- To help ensure ICAP integrity, DDD will move away from the Team Review and the Parent/Guardian Questionnaire.
- Parents/Guardians who live with the Participant, or are the Participant's primary caregiver, will still be eligible to serve as interviewees.
- ➤ Parents/Guardians who do not live with the Participant and are not the Participant's primary caregiver will be notified by the Service Coordinator that an ICAP is going to be administered and will be able to suggest names of people to be interviewed.



Quality Assurance: Baseline Data and Inter-Rater Reliability (IRR)

- ➤ The current Team Review process will be replaced with a quality assurance tool focused on identifying significant changes between ICAP renewals and the historical baseline.
- ➤ The Inter-Rater Reliability (IRR) Review process will require IRR Reviewers to observe ICAP interviews in real time to identify respondent-drift from ICAP protocols and provide greater oversight to new respondents.



Post-Payment Claims Reviews

- > DD Program Accuracy Staff reviewing claims
- > Excess of 35 hrs. a week of Day Services
 - ➤ Single Provider Letter requesting recoupment
 - ➤ Multiple Providers Conf. call to determine outcome



ISP Meeting Preparation

- Agency staff attending ISP meetings coming prepared
 - > Lack of assessment results, at Annual ISP's
 - Staff attending are unknown to the participant

- Question
 - Do Providers have documentation of a habilitation program daily? During each shift?



State Transition Plan - STP

➤ DHHS-DD Continues to conduct agency interviews and on-site surveys of Residential Settings. The day sites have been completed, and letters are being sent to providers. There was a hold on the letters to all workshops, pending technical assistance from CMS, which was received on Friday, October 12, 2018. Letters will be sent out over the next several weeks.

To date, 419 total sites have been assessed. 83% of all sites assessed have received a letter informing if the site is compliant, or if remediation is needed.

Residential Sites Completed: 84% CDD

77% Group Homes

24% Extended Family Homes

Day Sites Completed: 87%



State Transition Plan – STP: Setting Trends

129 Sites are Fully Compliant

139 Sites are/were Partially Compliant

- 123 are still in the process of remediating
- 16 have since completed their remediation plans

Of all Partially Compliant settings:

- 8 Settings did not have a grievance process
- 76 Settings did not have a process for anonymous complaints
- 23 Settings did not have a lease or residency agreement that complies with all Tenant/Landlord Laws
- 16 Settings did not describe the rights regarding housing/relocation
- 78 Settings did not provide locking bedroom doors
- 35 Settings did not provide locking bathroom doors
- 7 Settings had obstructions that prevented full accessibility to all common areas of the home, with no adaptations to ameliorate the obstruction.



Alternative Compliance -vs- Exception Funding

Per 404 NAC 1-003, Alternative Compliance is an "alternative method of compliance with any standards or compliance procedures . . . when the method of compliance meets the purpose and intent of any regulation. "

The Division has the discretion to allow Alternative Compliance to regulations in the rare situations when providing services in accordance to 403 or 404 would not best meet the health and safety of a participant.

Providers must include in the request:

- The citation of the specific part of the regulation for which alternative compliance is being requested;
- Support for the request (medical documentation, documentation of other alternatives attempted, etc.)
- The activities replacing requirement of the regulation (e.g. day services in the residence, due to doctor order);
- The requested alternative compliance start date
- The signature of the director; and
- Authorization from the provider's governing board, or designee.

Alternative Compliance is time-limited, and to be used as a last resort. Requests cannot be considered without all required information, above.



General Event Records – GER's

Event	Current 1Q18 Total	Last year's 1Q17 Total	Last year's 2017 Avg.	Completed DD QI Analysis due to Statistical Difference*
Death	16	13	12	None
Injury	722	636	706	None
Medication Error	35	57	43	None
Accident no apparent injury	21	20	20	None
Alcohol/Drug Abuse	0	2	1	Yes ¹
Altercation	99	100	83	None
Assault	428	513	499	None
AWOL/Missing Person	107	53	120	None
Behavioral Issue	479	343	348	None
Change of Condition	42	82	56	None
Complaint and/or Possible Litigation	134	85	85	None
Contraband	2	5	3	None
Exploitation	17	11	12	None
Fall Without Injury	19	28	22	None
Fire	3	2	4	None
Hospital	520	529	463	None
Inappropriate Alcohol/Drug Use	4	0	1	Yes ²
Law Enforcement Involvement	282	211	280	None
Out of Home Placement	14	1	6	Yes ³
Possible Criminal Activity/Misconduct	6	1	7	None
Potential Incident/Near Miss	19	32	26	None
PRN Psychotropic Use	1	2	1	None
Property Damage	211	110	160	None
Security Breach	0	0	0	None
Sensitive Situation	33	81	60	None
Serious Illness	8	8	9	None
Suicide Attempts or Threats	6	5	5	None
Theft/Larceny Attempt	17	10	13	None
Threatening Behavior	28	70	56	None
Emergency Safety Intervention	506	238	267	Yes ⁴
Restraint Other	16	17	20	None
*Statistical difference includes events with a significant standard deviation change from the 2017 rates.				



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General Event Records – GER's

Critical Incident Reports

Trends:

- Highest number of incidents in the top 5 categories are injuries, hospitalizations, emergency safety interventions, behavioral issue, and assaults.
- Injuries, behavioral issues, property damage, and emergency safety interventions are much higher compared to same quarter in 2017. (41% of the 506 emergency safety interventions were due to one individual)
- Change of condition and sensitive situations are 50% less than the same quarter in 2017.

Issues:

- GERs are not completed according to high notification guidelines (timelines)
- Assigning the correct category to the GERs
- 28 of 49 providers completed 100% of required components of the GERNEBRASKA

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Open Discussion



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