

**Tri-Counties Regional Center
Home and Community-based Services Waiver
Monitoring Review Report**

Conducted by:

**Department of Developmental Services
and
Department of Health Care Services**

August 4 - 14, 2008

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EXECUTIVE SUMMARY

The Department of Developmental Services (DDS) and the Department of Health Care Services (DHCS) conducted the federal compliance monitoring review of the Home and Community-based Services (HCBS) Waiver from August 4 - 14, 2008 at Tri-Counties Regional Center (TCRC). The monitoring team members were Linda Rhoades (Team Leader), Jeffery Greer, Corbett Bray and Jim Knight from DDS, and Raylyn Garrett, Patrick McMahan, and Annette Hanson, from DHCS.

Purpose of the Review

DDS contracts with 21 private, non-profit corporations to operate regional centers, which are responsible under state law for coordinating, providing, arranging or purchasing all services needed for eligible individuals with developmental disabilities in California. All HCBS Waiver services are provided through this system. It is the responsibility of DDS to ensure, with the oversight of DHCS, that the HCBS Waiver is implemented by regional centers in accordance with Medicaid statute and regulations.

Overview of the HCBS Waiver Programmatic Compliance Monitoring Protocol

The compliance monitoring review protocol is comprised of sections/components designed to determine if the consumers' needs and program requirements are being met and that services are being provided in accordance with the consumers' individual program plans (IPPs). Specific criteria have been developed for the review sections listed below that are derived from federal/state statutes and regulations and from Centers for Medicare & Medicaid Services directives and guidelines relating to the provision of HCBS Waiver services.

Scope of Review

The monitoring team reviewed a sample of 52 HCBS Waiver consumers. In addition, the following supplemental sample consumer records were reviewed: 1) one consumer whose HCBS Waiver eligibility had been previously terminated; 2) three consumers who moved from a developmental center; and 3) ten consumers who had special incidents reported to DDS during the review period of June 1, 2007 through May 31, 2008.

The monitoring team completed visits to three community care facilities (CCFs) and nine day programs. The team reviewed three CCF and 12 day program consumer records and had face-to-face visits with 37 selected sample consumers.

Overall Conclusion

TCRC is in substantial compliance with the federal requirements for the HCBS Waiver program. Specific recommendations that require follow-up actions by TCRC are included in the report findings. DDS is requesting documentation of follow-up actions taken by TCRC in response to each of the specific recommendations within 30 days following receipt of this report.

Major Findings

Section I – Regional Center Self Assessment

The self assessment responses indicated that TCRC has systems and procedures in place for implementing the state and HCBS Waiver requirements addressed in the self assessment criteria.

Section II – Regional Center Consumer Record Review

Fifty-two sample consumer records were reviewed for 31 documentation requirements (criteria) derived from federal and state statutes and regulations and HCBS Waiver requirements. The sample records were 84-100% in compliance for 30 applicable criteria. One criterion was rated as not applicable for this review.

The sample records were 98% in overall compliance for this review. TCRC's records were 95% and 96% in overall compliance for the collaborative reviews conducted in 2006 and in 2004, respectively.

Section III – Community Care Facility Consumer (CCF) Record Review

Three consumer records were reviewed at three CCFs for 19 documentation requirements (criteria) derived from Title 17, California Code of Regulations. The sample records were 100% in compliance for the 16 applicable criteria. Three criteria (3.7.a, 3.7.b, and 3.7.c) were rated not applicable because the consumers did not have any reportable special incidents during the review period. TCRC's records were 99% in overall compliance for the collaborative reviews conducted in 2006 and in 2004.

Section IV – Day Program Consumer Record Review

Twelve consumer records were reviewed at nine day programs for 17 documentation requirements (criteria) derived from Title 17, California Code of Regulations. The sample records were 100% in compliance for the 17 criteria. TCRC's records were 92% and 99% in overall compliance for the collaborative reviews conducted in 2006 and in 2004, respectively.

Section V – Consumer Observations and Interviews

Thirty-seven sample consumers were observed at their CCFs, day programs, or in independent living settings. The monitoring team observed that the consumers were in good health and were treated with dignity and respect. The interviewed consumers indicated that they were satisfied with their services, health and choices.

Section VI A – Service Coordinator Interviews

Ten service coordinators were interviewed using a standard interview instrument. The service coordinators responded to questions regarding their knowledge of the consumer, the IPP/annual review process, the monitoring of services, health issues and safety. The service coordinators were very familiar with the consumers and knowledgeable about their roles and responsibilities.

Section VI B – Clinical Services Interview

TCRC's physician and staff psychologist were interviewed using a standard interview instrument. They responded to informational questions regarding the monitoring of consumers with medical issues, medications and behavior plans, the coordination of medical and mental health care for consumers, the provision of clinical supports to service coordinators, and the clinical team's participation in the Risk Management Committee.

Section VI C – Quality Assurance Interview

Two Senior Quality Assurance Specialists were interviewed using a standard interview instrument. The staff responded to informational questions regarding how TCRC is organized to conduct Title 17 monitoring reviews, verification of provider qualifications, resource development activities, special incident reporting, and QA activities where there is no regulatory requirement.

Section VII A – Service Provider Interviews

Three CCF and six day program service providers were interviewed using a standard interview instrument. The service providers responded to questions in the context of the sample consumers regarding their knowledge of the consumer, the annual review process and the monitoring of health issues, medications, progress, safety and emergency preparedness. The service providers were familiar with the consumers and knowledgeable about their roles and responsibilities.

Section VII B – Direct Service Staff Interviews

Three CCF and six day program direct service staff were interviewed using a standard interview instrument. The direct service staff responded to questions regarding their knowledge of consumers, the IPP, communication, service delivery, procedures for safety, emergency preparedness, and medications. The staff were familiar with the consumers and knowledgeable about their roles and responsibilities.

Section VIII – Vendor Standards Review

The monitoring team reviewed three CCFs and six day programs utilizing a standard checklist with 23 criteria that are consistent with HCBS Waiver requirements. All of the reviewed vendors were in good repair with no immediate health or safety concerns observed.

Section IX – Special Incident Reporting

The monitoring team reviewed the records of the 52 HCBS Waiver consumers and ten supplemental sample consumers for special incidents during the review period. TCRC reported all special incidents for the sample selected for the HCBS Waiver review. For the supplemental sample, the service providers reported eight of the nine applicable incidents to TCRC within the required timeframes, and TCRC subsequently transmitted all ten special incidents to DDS within the required timeframes. TCRC's follow-up activities on consumer incidents were timely and appropriate for the severity of the situation.

SECTION I

REGIONAL CENTER SELF ASSESSMENT

I. Purpose

The regional center self assessment addresses the California Home and Community-based Services (HCBS) Waiver assurances criteria and is designed to provide information about the regional center's processes and practices. The responses are used to verify that the regional center has processes in place to ensure compliance with federal and state laws and regulations.

The self assessment obtains information about Tri-Counties Regional Center's (TCRC) procedures and practices to verify that there are processes in place to ensure compliance with state and federal laws and regulations as well as the assurances contained in the HCBS Waiver application approved by the Centers for Medicare & Medicaid Services.

II. Scope of Assessment

TCRC is asked to respond to questions in five categories that correspond to the HCBS Waiver assurances with which the regional center is responsible for complying. The questions are shown at the end of this section.

III. Results of Assessment

The self assessment responses indicate that TCRC has systems and procedures in place for implementing the state and HCBS Waiver requirements addressed in the self assessment criteria.

- ✓ The full response to the self assessment is available upon request.

Regional Center Self Assessment HCBS Waiver Assurances	
HCBS Waiver Assurances	Regional Center Assurances
<p>State conducts level of care need determinations consistent with the need for institutionalization</p>	<p>The regional center ensures that consumers meet ICF/DD, ICF/DD-H, or ICF/DD-N facility level of care requirements as a condition of initial and annual eligibility for the HCBS Waiver Program.</p> <p>Regional center ensures that the regional center staff responsible for certifying and recertifying consumers' HCBS Waiver eligibility meet the federal definition of a Qualified Mental Retardation Professional (QMRP).</p> <p>The regional center ensures that consumers are eligible for full scope Medi-Cal benefits before enrolling them in the HCBS Waiver.</p>
<p>Necessary safeguards have been taken to protect the health and welfare of persons receiving HCBS Waiver Services</p>	<p>The regional center takes action(s) to ensure consumers' rights are protected.</p> <p>The regional center takes action(s) to ensure that the consumers' health needs are addressed.</p> <p>The regional center ensures that behavior plans preserve the right of the consumer to be free from harm.</p> <p>The regional center maintains a Risk Management, Risk Assessment and Planning Committee.</p> <p>The regional center has developed and implemented a Risk Management/Mitigation Plan.</p> <p>Regional centers and local Community Care Licensing offices coordinate and collaborate in addressing issues involving licensing requirements and monitoring of CCFs pursuant to the MOU between DDS and Department of Social Services.</p> <p>The regional center has developed and implemented a quality assurance plan for Service Level 2, 3 and 4 community care facilities.</p> <p>The regional center reviews each community care facility annually to assure services are consistent with the program design and applicable laws, and development and implementation of corrective action plans as needed.</p> <p>The regional center conducts not less than two unannounced monitoring visits to each CCF annually.</p> <p>Service coordinators perform and document periodic reviews [at least annually] to ascertain progress toward achieving IPP objectives, and the consumer's and the family's satisfaction with the IPP and its implementation.</p> <p>Service coordinators have quarterly face-to-face meetings with consumers in CCFs, Family Home Agencies, Supported Living Services, and Independent Living Services to review services and progress toward achieving the IPP objectives for which the service provider is responsible.</p>

Regional Center Self Assessment HCBS Waiver Assurances	
HCBS Waiver Assurances	Regional Center Assurances
Necessary safeguards have been taken to protect the health and welfare of persons receiving HCBS Waiver Services (cont.)	<p>The regional center ensures that needed services and supports are in place when a consumer moves from a developmental center (DC) to a community living arrangement.</p> <p>Service coordinators provide enhanced case management to consumers who move from a DC by meeting with them face-to-face every 30 days for the first 90 days they reside in the community.</p>
Only qualified providers serve HCBS Waiver participants	<p>The regional center ensures that all HCBS Waiver service providers have signed the "HCBS Provider Agreement Form" and meet the required qualifications at the time services are provided.</p>
Plans of care are responsive to HCBS Waiver participant needs	<p>The regional center ensures that all HCBS Waiver consumers are offered a choice between receiving services and living arrangements in an institutional or community setting.</p> <p>Regional centers ensure that planning for IPPs includes a comprehensive assessment and information gathering process which addresses the total needs of HCBS Waiver consumers and is completed at least every three years at the time of his/her triennial IPP</p> <p>The IPPs of HCBS Waiver consumers are reviewed at least annually by the planning team and modified, as necessary, in response to the consumers' changing needs, wants and health status.</p> <p>The regional center uses feedback from consumers, families and legal representatives to improve system performance.</p> <p>The regional center documents the manner by which consumers indicate choice and consent.</p>

SECTION II

REGIONAL CENTER CONSUMER RECORD REVIEW

I. Purpose

The review is based upon documentation criteria derived from federal/state statutes and regulations and from the Centers for Medicare & Medicaid Services directives and guidelines relating to the provision of Home and Community-based Services (HCBS) Waiver services. The criteria address requirements for eligibility, consumer choice, notification of proposed action (NOA) and fair hearing rights, level of care, individual program plans (IPPs) and periodic reviews and reevaluations of services. The information obtained about the consumers' needs and services is tracked as a part of the on-site program reviews.

II. Scope of Review

1. Fifty-two HCBS Waiver consumer records were selected for the review sample.

Living Arrangement	# of Consumers
Community Care Facility (CCF)	9
With Family	14
Independent or Supported Living Setting	29

2. The review period covered activity from June 1, 2007 - May 31, 2008.

III. Results of Review

The 52 sample consumer records were reviewed for 31 documentation requirements derived from federal and state statutes and regulations and HCBS Waiver requirements. One supplemental record was reviewed solely for documentation that TCRC had either provided the consumer with written notification prior to termination of the consumer's HCBS Waiver eligibility or the consumer had voluntarily disenrolled from the HCBS Waiver. Additionally, three consumers were reviewed solely for documentation indicating they received face-to-face reviews every thirty days after moving from a developmental center. One criterion was not applicable for this review.

- ✓ The sample records were in 100% compliance for 21 criteria. There are no recommendations for these criteria.
- ✓ Findings for nine criteria are detailed below.

- ✓ A summary of the results of the review is shown in the table at the end of this section.

IV. Findings and Recommendations

- 2.2 Each record contains a dated and signed Medicaid Waiver Consumer Choice of Services/Living Arrangements form, (DS 2200). (SMM 4442.7), (42 CFR 441.302(d))

Findings

Fifty of the 52 (96%) sample consumer records contained a completed DS 2200 form. However, the DS 2200 form in the record for consumer #XX was not signed by the consumer. During the monitoring review, TCRC obtained the consumer’s signature on the DS 2200 form. Accordingly, no recommendation is required. The DS 2200 form in the record of consumer #XX was not dated indicating when the consumer signed the form.

2.2 Recommendation	Regional Center Plan/Response
TCRC should ensure that all DS 2200 forms are signed and dated at the time of the consumers’ initial HCBS Waiver eligibility.	TCRC will obtain a new DS 2200 (Choice form) for individual #XX to replace the form currently in the case record. This new Choice form will reflect the date the signature was obtained and will have “Replaces Original” written it to indicate the change.

- 2.5.b The consumer’s qualifying conditions documented in the Client Development Evaluation Report (CDER) are consistent with information contained in the consumer’s record. (SMM 4442.5), (42 CFR 441.302(c)), (Title 22, CCR, §51343)

Findings

Forty-eight of the 52 (92%) consumer records documented level of care qualifying conditions that were consistent with information found elsewhere in the record. However, information contained in four consumer records (detailed below) did not support the determination that all of the issues identified in the CDER and DS 3770 could be considered qualifying conditions. Unless otherwise noted in the list below, the following were identified as qualifying conditions on the DS 3770 but there was no supporting information in the consumers’ records (IPP, progress reports, vendor reports, etc.) that described the impact of the identified conditions or need for services and supports.

1. Consumer # [REDACTED] Accordingly, no recommendation is required.
2. Consumer # [REDACTED]
3. Consumer # [REDACTED] Accordingly, no recommendation is required.
4. Consumer # [REDACTED] Accordingly, no recommendation is required.

2.5.b Recommendation	Regional Center Plan/Response
<p>TCRC should determine if the items listed for consumer #XX are appropriately identified as qualifying conditions. The consumer's DS 3770 form should be corrected to ensure that any items that do not represent substantial limitations in the consumer's ability to perform activities of daily living and/or participate in community activities are no longer identified as qualifying conditions. Due to an insufficient number of qualifying conditions, these corrections may require that the consumer's HCBS Waiver eligibility be terminated. If TCRC determines that any of the issues above are correctly identified as qualifying conditions, documentation (updated IPP, progress reports, etc.) that supports the original determination should be submitted with the response to this report.</p>	<p>TCRC will determine if the items listed above are appropriately identified as qualifying conditions. The DS 3770 form for individual #XX will be corrected as needed to ensure that any items that do not represent substantial limitations in the individuals' ability to perform activities of daily living and/or participate in community activities are no longer identified as qualifying conditions.</p> <p>[REDACTED]</p>

- 2.6.a The IPP is reviewed (*at least annually*) by the planning team and modified as necessary, in response to the consumer’s changing needs, wants or health status. (*42 CFR 441.301(b)(1)(I)*)

Finding

Fifty-one of the 52 (98%) consumer records contained documentation that the consumers’ IPP had been reviewed annually by the planning team. The record for consumer #XX did not contain documentation (new IPP or Standardized Annual Review form) that the consumer’s IPP had been reviewed during the review period. However, a new IPP was completed in June 2008. Accordingly, no recommendation is required.

- 2.6.b The HCBS Waiver Standardized Annual Review Form (SARF) is completed and signed annually by the planning team to document whether or not a change to the existing IPP is necessary and that the consumer’s health status and CDER have been reviewed. (HCBS Waiver Requirement)

Finding

Twenty-nine of the 30 (97%) applicable sample consumer records contained a completed SARF. However, the annual IPP review for consumer #X did not include a SARF.

2.6.b Recommendation	Regional Center Plan/Response
TCRC should ensure that a SARF form is completed during the annual IPP review process for consumer #X.	TCRC will ensure that the SARF form is completed during their 2009 annual review for individual #X.

- 2.7.a The IPP is signed, prior to its implementation, by an authorized representative of the regional center and the consumer or, where appropriate, his/her parents, legal guardian, or conservator. (*WIC §4646(g)*)

Finding

Fifty-one of the 52 (98%) consumer records contained IPPs that were signed by TCRC and the consumers or their legal representatives. Consumer #XX had not signed his IPP. During the review, TCRC obtained the required signature on the consumers’ IPP. Accordingly, no recommendation is required.

2.9.a The IPP addresses the qualifying conditions identified in the CDER and Medicaid Waiver Eligibility Record (DS 3770). (WIC §4646.5(a)(2))

Findings

Forty-six of the 49 (94%) sample consumer records contained IPPs that addressed the consumers' qualifying conditions. However, the IPP for consumers #X, #X, and #XX, did not identify the supports or services that are in place to address all of the consumer's qualifying conditions as indicated below.

1. Consumer # [REDACTED]
2. Consumer # [REDACTED]
3. Consumer # [REDACTED]

2.9.a Recommendation	Regional Center Plan/Response
TCRC should ensure that the IPPs for consumers #X and #XX address the services and supports in place for the issues identified above.	TCRC will ensure the IPPs for all individuals address the services and supports in place for the individuals qualifying conditions.

2.12 Periodic review and reevaluations of consumer progress are completed (*at least annually*) to ascertain that planned services have been provided, that consumer progress has been achieved within the time specified, and the consumer and his/her family are satisfied with the IPP and its implementation. (WIC §4646.5(a)(6))

Finding

Fifty-one of the 52 (98%) consumer records contained documentation of periodic review and reevaluation of consumer progress at least annually. However, the record for consumer #XX did not contain documentation that the consumers' progress had been reviewed within the year.

2.12 Recommendation	Regional Center Plan/Response
TCRC should ensure that a review and reevaluation of progress regarding planned services, timeframes and satisfaction for consumer #XX is completed and documented at least annually.	TCRC will ensure that the annual review for individual #XX includes an evaluation of their progress.

2.13.a Quarterly face-to-face meetings are completed for consumers living in community out-of-home settings, i.e., Service Level 2, 3 or 4 community care facilities, family home agencies or supported living and independent living settings. (*Title 17, CCR, §56047*), (*Title 17, CCR, §56095*), (*Title 17, CCR, §58680*), (*Contract requirement*)

Findings

Thirty-two of the 38 (84%) applicable sample consumer records had quarterly face-to-face meetings completed and documented. However, the records for six consumers did not meet the requirements as indicated below:

1. The records for consumers #X, #X, #XX, and #XX contained documentation of three of the required meetings.
2. The record for consumer #XX contained documentation of two of the required meetings.
3. The record for consumer #XX did not contain documentation of any of the required meetings.

2.13.a Recommendation	Regional Center Plan/Response
1. TCRC should ensure that all future face-to-face meetings are completed and documented each quarter for the consumers identified above.	TCRC will ensure face-to-face meeting are completed & documented each quarter for individuals' #X, #X, #XX, #XX, #XX and #XX.
2. TCRC should evaluate what actions may be necessary to ensure that quarterly face-to-face meetings are completed for all applicable consumers.	<p>In 2009, TCRC will implement the SANDIS Welcome Screen. Services and Supports staff will use this program as a tool to track their Quarterly Reporting. In addition, TCRC will continue to utilize their electronic monitoring program which tracks this information by team and SC.</p> <p>Completion of quarterly visits and reports is a key performance indicator for SCs. Any staff not meeting the indicator will be given more intensive coaching to assist them in meeting the expectation.</p> <p>Routine chart audits will identify any other problem areas requiring further action from the manager and/or staff.</p>

2.13.b Quarterly reports of progress are completed for consumers living in community out-of-home settings, i.e., Service Level 2, 3 or 4 community care facilities, family home agencies or supported living and independent living settings. (*Title 17, CCR, §56047*), (*Title 17, CCR, §56095*), (*Title 17, CCR, §58680*), (*Contract requirement*)

Findings

Thirty-two of the 38 (84%) applicable sample consumer records had quarterly reports of progress completed for consumers living in community out-of-home settings. However, six records did not contain the required quarterly reports of progress as indicated below:

1. The records for consumers #X, #X, #XX, and #XX contained three quarterly progress reports.
2. The record for consumer #XX contained two quarterly progress reports.
3. The record for consumer #XX contained no quarterly progress reports.

2.13.b Recommendation	Regional Center Plan/Response
1. TCRC should ensure that future quarterly reports of progress are completed for the consumers identified above.	TCRC will ensure face-to-face meeting are completed & documented each quarter for individuals' #X, #X, #XX, and #XX
2. TCRC should evaluate what actions may be necessary to ensure that quarterly progress reports are completed for all applicable consumers.	<p>In 2009, TCRC will implement the SANDIS Welcome Screen. Services and Supports staff will use this program as a tool to track their Quarterly Reporting. In addition, TCRC will continue to utilize their electronic monitoring program which tracks this information by team and SC.</p> <p>Completion of quarterly visits and reports is a key performance indicator for SCs. Any staff not meeting the indicator will be given more intensive coaching to assist them in meeting the expectation.</p> <p>Routine chart audits will identify any other problem areas requiring further action from the manager and/or staff.</p>

Regional Center Consumer Record Review Summary						
Sample Size = 52 + 4 Supplemental Record						
	Criteria	+	-	N/A	% Met	Follow-up
2.0	The consumer is Medi-Cal eligible. (SMM 4442.1)	52			100	None
2.1	Each record contains a Medicaid Waiver Eligibility Record (DS 3770), signed by a Qualified Mental Retardation Professional (QMRP), which documents the date of the consumer's initial HCBS Waiver eligibility certification, annual recertifications, the consumer's qualifying conditions and short-term absences. (SMM 4442.1), (42 CFR 483.430(a))	Criterion 2.1 consists of four sub-criteria (2.1a-d) that are reviewed and rated independently.				
2.1.a	The DS 3770 is signed by a Qualified Mental Retardation Professional and the title "QMRP" appears after the person's signature.	52			100	None
2.1.b	The DS 3770 form identifies the consumer's qualifying conditions and any applicable special health care requirements for meeting the Title 22 level of care requirements.	52			100	None
2.1.c	The DS 3770 form documents annual recertifications.	52			100	None
2.1.d	The DS 3770 documents short-term absences of 120 days or less, if applicable.			52	NA	None
2.2	Each record contains a dated and signed Medicaid Waiver Consumer Choice of Services/Living Arrangements form, (DS 2200). (SMM 4442.7), (42 CFR 441.302(d))	50	2		96	See Narrative
2.3	There is a written notification of a proposed action and documentation that the consumer has been sent written notice of their fair hearing rights whenever choice of living arrangements is not offered, services or choice of services are denied, the consumer/parent/legal guardian or legal representative does not agree with all, or part of the components in the consumer's IPP, or the consumer's HCBS Waiver eligibility has been terminated. (SMM 4442.7), (42 CFR Part 431, Subpart E), (WIC §4646(g))	1		52	100	None

Regional Center Consumer Record Review Summary
Sample Size = 52 + 4 Supplemental Record

	Criteria	+	-	N/A	% Met	Follow-up
2.4	Each record contains a current Client Development Evaluation Report (CDER) that has been reviewed within the last 12 months. (SMM 4442.5), (42 CFR 441.302)	52			100	None
2.5.a	The consumer's qualifying conditions and any special health care requirements used to meet the level of care requirements for care provided in an ICF-DD, ICF-DDH, and ICF/DD-N facility are documented in the consumer's CDER and other assessments. (SMM 4442.5), (42 CFR 441.302(c)), (Title 22, CCR, §51343)	52			100	None
2.5.b	The consumer's qualifying conditions documented in the CDER are consistent with information contained in the consumer's record.	48	4		92	See Narrative
2.6.a	IPP is reviewed (at least annually) by the planning team and modified as necessary, in response to the consumer's changing needs, wants or health status. (42 CFR 441.301(b)(1)(I))	51	1		98	See Narrative
2.6.b	The HCBS Waiver Standardized Annual Review Form is completed and signed annually by the planning team to document whether or not a change to the existing IPP is necessary, and health status and CDER have been reviewed. (HCBS Waiver requirement)	29	1	22	97	See Narrative
2.7.a	The IPP is signed, prior to its implementation, by an authorized representative of the regional center and the consumer, or where appropriate, his/her parents or legal guardian or conservator. (WIC §4646(g))	51	1		98	See Narrative
2.7.b	IPP addenda are signed by an authorized representative of the regional center and the consumer, or where appropriate, his/her parents, legal guardian, or conservator.	15		37	100	None
2.7.c	The IPP is prepared jointly with the planning team. (WIC §4646(d))	52			100	None
2.8	The IPP includes a statement of goals based on the needs, preferences and life choices of the consumer. (WIC §4646.5(a))	52			100	None

Regional Center Consumer Record Review Summary						
Sample Size = 52 + 4 Supplemental Record						
	Criteria	+	-	N/A	% Met	Follow-up
2.9	The IPP addresses the consumer's goals and needs. (WIC §4646.5(a)(2))	Criterion 2.9 consists of seven sub-criteria (2.9 a-g) that are reviewed independently				
2.9.a	The IPP addresses the qualifying conditions identified in the CDER and Medicaid Waiver Eligibility Record (DS 3770).	46	3	3	94	See Narrative
2.9.b	The IPP addresses the special health care requirements.	25		27	100	None
2.9.c	The IPP addressed the services for which the CCF provider is responsible for implementing.	9		43	100	None
2.9.d	The IPP addressed the services for which the day program provider is responsible for implementing.	30		22	100	None
2.9.e	The IPP addresses the services for which the supported living services agency or independent living services provider is responsible for implementing.	29		23	100	None
2.9.f	The IPP addresses the consumer's goals, preferences and life choices.	52			100	None
2.9.g	The IPP includes a family plan component if the consumer is a minor. (WIC §4685(c)(2))	6		46	100	None
2.10.a	The IPP includes a schedule of the type and amount of all services and supports purchased by the regional center. (WIC §4646.5(a)(4))	52			100	None
2.10.b	The IPP includes a schedule of the type and amount of all services and supports obtained from generic agencies or other resources. (WIC §4646.5(a)(4))	52			100	None
2.10.c	The IPP specifies the approximate scheduled start date for the new services. (WIC §4646.5(a)(4))	15		37	100	None
2.11	The IPP identifies the provider or providers of service responsible for implementing services, including, but not limited to vendors, contract providers, generic service agencies and natural supports. (WIC §4646.5(a)(4))	52			100	None

Regional Center Consumer Record Review Summary						
Sample Size = 52 + 4 Supplemental Record						
	Criteria	+	-	N/A	% Met	Follow-up
2.12	Periodic review and reevaluations of consumer progress are completed (<i>at least annually</i>) to ascertain that planned services have been provided, that consumer progress has been achieved within the time specified, and the consumer and his/her family are satisfied with the IPP and its implementation. (<i>WIC §4646.5(a)(6)</i>)	51	1		98	See Narrative
2.13.a	Quarterly face-to-face meetings are completed for consumers living in community out-of-home settings, i.e., Service Level 2, 3 or 4 community care facilities, family home agencies or supported living and independent living settings. (<i>Title 17, CCR, §56047</i>), (<i>Title 17, CCR, §56095</i>), (<i>Title 17, CCR, §58680</i>), (<i>Contract requirement</i>)	32	6	14	84	See Narrative
2.13.b	Quarterly reports of progress are completed for consumers living in community out-of-home settings, i.e., Service Level 2, 3 or 4 community care facilities, family home agencies or supported living and independent living settings. (<i>Title 17, CCR, §56047</i>), (<i>Title 17, CCR, §56095</i>), (<i>Title 17, CCR, §58680</i>), (<i>Contract requirement</i>)	32	6	14	84	See Narrative
2.14	Face-to-face reviews are completed no less than once every 30 days for the first 90 days following the consumer's move from a developmental center to a community living arrangement. (<i>WIC §4418.3</i>)	3		52	100	None

SECTION III

COMMUNITY CARE FACILITY CONSUMER RECORD REVIEW

I. Purpose

The review addresses the requirements for community care facilities (CCFs) to maintain consumer records and prepare written reports of consumer progress in relation to the services addressed in the individual program plan (IPP) for which the facility is responsible. The criteria are derived from Title 17, California Code of Regulations.

II. Scope of Review

Three consumer records were reviewed at three CCFs visited by the monitoring team. The facilities' consumer records were reviewed to determine compliance with 19 criteria.

III. Results of Review

The consumer records were 100% in compliance for the 16 applicable criteria. Three criteria (3.7.a, 3.7.b, and 3.7.c) were rated not applicable because the consumers did not have any reportable special incidents during the review period.

- ✓ A summary of the results of the review is shown in the table at the end of this section.

Community Care Facility Record Review Summary						
Sample Size: Consumers = 3; CCFs = 3						
	Criteria	+	-	N/A	% Met	Follow-up
3.1	An individual consumer file is maintained by the CCF that includes the documents and information specified in Title 17 and Title 22. (<i>Title 17, CCR, §56017(b)</i>), (<i>Title 17, CCR §56059(b)</i>), (<i>Title 22, CCR, §80069</i>)	3			100	None
3.1.a	The consumer record contains a statement of ambulatory or nonambulatory status.	3			100	None
3.1.b	The consumer record contains known information related to any history of aggressive or dangerous behavior toward self or others.	2		1	100	None
3.1.c	The consumer record contains current health information that includes medical, dental and other health needs of the consumer including annual visit dates, physicians' orders, medications, allergies, and other relevant information.	3			100	None
3.1.d	The consumer record contains current emergency information: family, physician, pharmacy, etc.	3			100	None
3.1.e	The consumer record contains a recent photograph and a physical description of the consumer.	3			100	None
3.1.i	Special safety and behavior needs are addressed.	3			100	None
3.2	The consumer record contains a written admission agreement completed for the consumer that includes the certifying statements specified in Title 17, and is signed by the consumer or his/her authorized representative, the regional center and the facility administrator. (<i>Title 17, CCR, §56019(c)(1)</i>)	3			100	None
3.3	The facility has a copy of the consumer's current IPP. (<i>Title 17, CCR, §56022(c)</i>)	3			100	None

Community Care Facility Record Review Summary						
Sample Size: Consumers = 3; CCFs = 3						
	Criteria	+	-	N/A	% Met	Follow-up
3.4.a	Service Level 2 and 3 facilities prepare and maintain written semiannual reports of consumer progress. (<i>Title 17, CCR, §56026(b)</i>)	1		2	100	None
3.4.b	Semiannual reports address and confirm the consumer's progress toward achieving each of the IPP objectives for which the facility is responsible.	1		2	100	None
3.5.a	Service Level 4 facilities prepare and maintain written quarterly reports of consumer progress. (<i>Title 17, CCR, §56026(c)</i>)	2		1	100	None
3.5.b	Quarterly reports address and confirm the consumer's progress toward achieving each of the IPP objectives for which the facility is responsible.	2		1	100	None
3.5.c	Quarterly reports include a summary of data collected. (<i>Title 17, CCR, §56013(d)(4)</i>), (<i>Title 17, CCR, §56026</i>)	2		1	100	None
3.6.a	The facility prepares and maintains ongoing, written consumer notes, as required by Title 17. (<i>Title 17, CCR §56026(a)</i>)	3			100	None
3.6.b	The ongoing notes/information verify that behavior needs are being addressed.	2		1	100	None
3.7.a	Special incidents are reported to the regional center within 24 hours after learning of the occurrence of the special incident. (<i>Title 17, CCR, §54327</i>)			3	NA	None
3.7.b	A written report of the special incident is submitted to the regional center within 48 hours after the occurrence of the special incident. (<i>Title 17, CCR, §54327</i>)			3	NA	None
3.7.c	Follow-up activities were undertaken to prevent, reduce or mitigate future danger to the consumer. (<i>Title 17, CCR, §54327</i>)			3	NA	None

SECTION IV

DAY PROGRAM CONSUMER RECORD REVIEW

I. Purpose

The review criteria address the requirements for day programs to maintain consumer records and prepare written reports of consumer progress in relation to the services addressed in the individual program plan (IPP) that the day program provider is responsible for implementing. The criteria are derived from Title 17, California Code of Regulations.

II. Scope of Review

Twelve sample consumer records were reviewed at nine day programs visited by the monitoring team. The records were reviewed to determine compliance with 17 criteria.

III. Results of Review

The consumer records were 100% in compliance for the 17 criteria.

- ✓ A summary of the results of the review is shown in the table at the end of this section.

Day Program Record Review Summary						
Sample Size: Consumers = 12; Day Programs = 9						
	Criteria	+	-	N/A	% Met	Follow-up
4.1	An individual consumer file is maintained by the day program that includes the documents and information specified in Title 17. (Title 17, CCR, §56730)	12			100	None
4.1.a	The consumer record contains current emergency and personal identification information including the consumer's address, telephone number, names and telephone numbers of residential care provider, relatives, and/or guardian or conservator, physician name(s) and telephone number(s), pharmacy name, address and telephone number and health plan, if appropriate.	12			100	None
4.1.b	The consumer record contains current health information that includes current medications, known allergies, medical disabilities, infectious, contagious, or communicable conditions, special nutritional needs, and immunization records.	12			100	None
4.1.c	The consumer record contains any medical, psychological, and social evaluations identifying the consumer's abilities and functioning level, provided by the regional center.	12			100	None
4.1.d	The consumer record contains an authorization for emergency medical treatment signed by the consumer and/or the authorized consumer representative.	12			100	None
4.1.e	The consumer record contains documentation that the consumer and/or the authorized consumer representative has been informed of his/her personal rights.	12			100	None
4.1.f	Data is collected that measures consumer progress in relation to the services addressed in the IPP for which the day program provider is responsible for implementing.	12			100	None

Day Program Record Review Summary						
Sample Size: Consumers = 12; Day Programs = 9						
	Criteria	+	-	N/A	% Met	Follow-up
4.1.g	The consumer record contains up-to-date case notes reflecting important events or information not documented elsewhere.	12			100	None
4.1.h	The consumer record contains documentation that special safety and behavior needs are being addressed.	11		1	100	None
4.2	The day program has a copy of the consumer's current IPP. (<i>Title 17, CCR §56720(b)</i>)	12			100	None
4.3.a	The day program provider develops, maintains, and modifies as necessary, documentation regarding the manner in which it implements the services addressed in the IPP. (<i>Title 17, CCR, §56720(a)</i>)	12			100	None
4.3.b	The day program's ISP or other program documentation is consistent with the services addressed in the consumer's IPP.	12			100	None
4.4.a	The day program prepares and maintains written semiannual reports. (<i>Title 17, CCR, §56720(c)</i>)	12			100	None
4.4.b	Semiannual reports address the consumer's performance and progress relating to the services for which the day program is responsible for implementing.	12			100	None
4.5.a	Special incidents are reported to the regional center within 24 hours after learning of the occurrence of the special incident. (<i>Title 17, CCR, §54327</i>)	1		11	100	None
4.5.b	A written report of the special incident is submitted to the regional center within 48 hours after the occurrence of the special incident. (<i>Title 17, CCR, §54327</i>)	1		11	100	None
4.5.c	There is appropriate follow-up to special incidents to resolve issue and eliminate or mitigate future risk. (<i>Title 17, CCR, §54327</i>)	1		11	100	None

SECTION V

CONSUMER OBSERVATIONS AND INTERVIEWS

I. Purpose

The consumer observations are conducted to verify that the consumers appear to be healthy and have good hygiene. Interview questions focus on the consumers' satisfaction with their living situation, day program and work activities, health, choice, and regional center services.

II. Scope of Observations and Interviews

Thirty-seven of 52 consumers were observed and/or interviewed at their day programs, employment sites, community care facilities (CCFs), or in independent living settings.

- ✓ Thirty-four consumers agreed to be interviewed by the monitoring teams.
- ✓ Three consumers did not communicate verbally or declined to be interviewed, but were observed.
- ✓ Fifteen consumers were unavailable or declined to be interviewed or observed.

III. Results of Observations and Interviews

Thirty-six of the 37 consumers interviewed indicated satisfaction with their living situation, day program, work activities, health, choices, and regional center services. The consumers' overall appearance reflected personal choice and individual style.

IV. Finding and Recommendation

Consumer #X at CCF #X [REDACTED]

[REDACTED]



Recommendation	Regional Center Plan/Response
TCRC should ensure that consumer #X [REDACTED]	[REDACTED]

SECTION VI A

SERVICE COORDINATOR INTERVIEWS

I. Purpose

The interviews determine how well the service coordinators know their consumers, the extent of their participation in the IPP/annual review process, and how they monitor services, health and safety issues.

II. Scope of Interviews

1. The monitoring team interviewed ten Tri-Counties Regional Center (TCRC) service coordinators.
2. The interview questions are divided into two categories.
 - ✓ The questions in the first category are related to the consumers selected by the monitoring team.
 - ✓ The questions in the second category are related to general areas.

III. Results of Interviews

1. The service coordinators were very familiar with their respective consumers. They were able to relate specific details regarding the consumers' desires, preferences, life circumstances, and service needs.
2. The service coordinators were knowledgeable about the IPP/annual review process and monitoring requirements. Service providers and family members provided input on the consumers' needs, preferences and satisfaction with services outlined in the IPP. For consumers in out-of-home placement settings, service coordinators conduct quarterly face-to-face visits and develop written assessments of consumer progress and satisfaction. In preparation for the quarterly visits, service coordinators review their previous progress reports, pertinent case notes, special incident reports, and vendor reports of progress.
3. To better understand issues related to consumers' use of medication and issues related to side-effects, the service coordinators utilize the TCRC nurses and internet medication guides as resources. TCRC's clinical team schedules new employee training on medications and side effects, and offers periodic trainings on new and commonly used medications.

4. The service coordinators monitor the consumers' services, health and safety during periodic visits. The service coordinators were knowledgeable about the special incident report (SIR) process and work with the vendors to ensure all special incidents are reported and appropriate follow-up activities are completed. Service coordinators work closely with quality assurance staff, and are briefed on SIR trends that may affect their caseloads.

SECTION VI B

CLINICAL SERVICES INTERVIEW

I. Purpose

The clinical services interview is used to obtain supplemental information on how the regional center is organized to provide clinical support to consumers and service coordinators. The interview with clinical services aids in determining what measures the regional center is utilizing to ensure the ongoing health and safety of all Home and Community-based Services Waiver consumers.

II. Scope of Interview

1. The interview questions cover the following topics: routine monitoring of consumers with medical issues, medications and behavior plans; coordination of medical and mental health care for consumers; circumstances under which actions are initiated for medical or behavior issues; clinical supports to assist service coordinators; improved access to preventive health care resources; role in Risk Management Committee and special incident reports.
2. The monitoring team interviewed a physician and a staff psychologist at Tri-Counties Regional Center (TCRC).

III. Results of Interview

1. The TCRC clinical team consists of psychologists, physicians, intake coordinator, a psychopharmacologist, and a registered nurse consultant.
2. The TCRC service coordinators are instrumental in identifying and requesting support and/or review of potential medical issues from the clinical team. The clinical team can be accessed by telephone, in person and/or by e-mail. Service providers can also request assistance regarding concerns or potential medical issues. The clinical team meets weekly to discuss consumer issues, and follows up as appropriate.
3. Consumers' medications are reviewed routinely by the service coordinators. The psychopharmacologist is also available to review consumers with multiple medication regimens. The clinical team is available for any medication issues, and will assess, evaluate and make referrals as needed.
4. The clinical team is available to service coordinators for consultations regarding consumers' behavioral needs. The clinical team is also involved with behavior intervention plans for children with autism as well as offering early intervention services.

5. When service coordinators identify mental health issues, they are able to utilize the services of the team psychologist. Monthly meetings are conducted between the regional center and local county mental health to assist in coordinating psychological, psychiatric and counseling services.
6. The clinical team provides ongoing training to service coordinators. This is accomplished through in-service training and/or individual consultation regarding consumer specific issues. Clinical team members also participate in new employee orientation training.
7. TCRC has taken a proactive role in advocating for prevention, education, resource development, and medical treatments for consumers. These efforts include, but are not limited to:
 - ✓ Clinician Referral Guidelines and Checklist - this tool assists service coordinators to screen for possible medical issues
 - ✓ Multi-disciplinary evaluations
 - ✓ Facilitation and coordination of generic resources
 - ✓ Vendor training
 - ✓ Medication training and technical support by the psychopharmacologist
8. Members of the clinical team participate in the Risk Management Committee by reviewing all medical related special incident reports (SIRs). Clinical team members also participate on the morbidity and mortality review committee. Any issues or trends that are identified through their role in risk management may become topics for future trainings.

SECTION VI C

QUALITY ASSURANCE INTERVIEW

I. Purpose

The informational interview with quality assurance (QA) staff ascertains how the regional center has organized itself to conduct Title 17 monitoring of community care facilities (CCFs), two unannounced visits to CCFs, QA evaluations of CCFs, and service provider training. The interview also inquires about verification of provider qualifications, resource development activities, and quality assurance among programs and providers where there is no regulatory requirement to conduct quality assurance monitoring.

II. Scope of Interview

The monitoring team interviewed two Senior Quality Assurance Specialists who are part of the team responsible for conducting Tri-Counties Regional Center's (TCRC) QA activities.

III. Results of Interview

1. Quality Assurance Specialists conduct the annual Title 17 monitoring reviews at CCFs. Additionally, they conduct two unannounced visits annually to each CCF. The QA Specialists also act as team leaders for the triennial QA evaluations, which are the more extensive reviews that may include additional regional center staff and consumers as team members. Evaluation activities include a review of records, medications, personal and incidental funds, consumer interviews, staffing ratios, first aid certificates, and safety walk-throughs.
2. When issues of substantial inadequacies are identified, QA Specialists are responsible for developing corrective action plans (CAPs) and ensuring providers complete the CAP requirements. Additional QA visits can occur to ensure that CAP issues have been resolved or to follow-up on special incidents that are related to vendor operations, such as medication errors. QA Specialists provide on-site technical assistance and training to vendors in order to help them resolve specific issues arising from these visits.
3. QA Specialists conduct monitoring visits with other service providers such as day programs, work activity programs, and supported living programs.
4. QA Specialists/SIR Specialists review all SIRs and forwards data to the TCRC Risk Management Committee for review.

SECTION VII A

SERVICE PROVIDER INTERVIEWS

I. Purpose

The interviews determine how well the service provider knows the consumers, the extent of their assessment process for the annual IPP development and/or review, the extent of their plan participation, how the plan was developed, how service providers ensure accurate documentation, communicate, address and monitor health issues, their preparedness for emergencies, how they monitor safety and safeguard medications.

II. Scope of Interviews

1. The monitoring team interviewed nine service providers at three community care facilities (CCFs) and six day programs where services are provided to the consumers that were visited by the monitoring team.
2. The interview questions are divided into two categories.
 - ✓ The questions in the first category are related to sample consumers selected by the monitoring team.
 - ✓ The questions in the second category are related to general areas.

III. Results of Interviews

1. The service providers were familiar with the strengths, needs and preferences of their respective consumers.
2. The service providers indicated that they conducted assessments of the consumers, participated in their IPP development, provided the program specific services addressed in the IPPs and attempted to foster the progress of consumers.
3. The service providers monitored consumer health issues and safeguarded medications.
4. The service providers communicated with people involved in the consumers' lives and monitored progress documentation.
5. The service providers were prepared for emergencies, monitored the safety of consumers, and understood special incident reporting and follow-up processes.

SECTION VII B

DIRECT SERVICE STAFF INTERVIEWS

I. Purpose

The interviews determine how well the direct service staff knows the consumers and their understanding of the IPP and service delivery requirements, how they communicate, and their level of preparedness to address safety issues, their understanding of emergency preparedness, and knowledge about safeguarding medications.

II. Scope of Interviews

1. The monitoring team interviewed nine direct service staff at three community care facilities (CCFs) and six day programs where services are provided to the consumers that were visited by the monitoring team.
2. The interview questions are divided into two categories.
 - ✓ The questions in the first category are related to sample consumers selected by the monitoring team.
 - ✓ The questions in the second category are related to general areas.

III. Results of Interviews

1. The direct service staff were familiar with the strengths, needs and preferences of their respective consumers.
2. The direct service staff were knowledgeable about their roles and responsibilities for providing the services addressed in the consumers' IPPs.
3. The direct service staff demonstrated that they understood the importance of communication with all individuals concerned with the consumers.
4. The direct service staff were prepared to address safety issues and emergencies, and were familiar with special incident reporting requirements.
5. The direct service staff demonstrated an understanding about emergency preparedness.
6. The direct service staff were knowledgeable regarding safeguarding and assisting with self-administration of medications where applicable.

SECTION VIII

VENDOR STANDARDS REVIEW

I. Purpose

The review ensures that the selected community care facilities (CCFs) and day programs are serving consumers in a safe, healthy and positive environment where their rights are respected.

II. Scope of Review

1. The monitoring team reviewed a total of 3 CCFs and 6 day programs.
2. The team used a monitoring review checklist consisting of twenty-three criteria. The review criteria are used to assess the physical environment, health and safety, medications, services and staff, consumers' rights, and the handling of consumers' money.

III. Results of Review

All of the CCFs and day programs were found to be in good condition with no immediate health and safety concerns. Specifics for one finding are detailed below.

IV. Finding and Recommendation

8.3 c First Aid

Finding

Day program #X had five employees, and day program #X had one employee that did not have current first aid certificates on file. Subsequent to the review, all the employees attended first aid trainings and the first aid cards were faxed to DHCS. Accordingly, no recommendation is required.

SECTION IX

SPECIAL INCIDENT REPORTING

I. Purpose

The review verifies that special incidents have been reported within the required timeframes, that documentation meets the requirements of Title 17, California Code of Regulations, and that the follow-up was complete.

II. Scope of Review

1. Special incident reporting of deaths by Tri-Counties Regional Center (TCRC) was reviewed by comparing deaths entered into the Client Master File for the review period with special incident reports (SIRs) of deaths received by the Department of Developmental Services (DDS).
2. The records of the 52 consumers selected for the Home and Community-based Services (HCBS) Waiver sample were reviewed to determine that all required special incidents were reported to DDS during the review period.
3. A supplemental sample of ten consumers who had special incidents reported to DDS within the review period was assessed for timeliness of reporting and documentation of follow-up activities. The follow-up activities were assessed for being timely, appropriate to the situation, and resulting in an outcome that ensures the consumer is protected from adverse consequences, and that risks are either minimized or eliminated.

III. Results of Review

1. TCRC reported all deaths during the review period to DDS.
2. TCRC reported all special incidents in the sample of 52 records selected for the HCBS Waiver review to DDS.
3. TCRC's vendors reported eight of the nine (88%) applicable incidents in the supplemental sample within the required timeframes.
4. TCRC reported the ten (100%) incidents to DDS within the required timeframes.
5. TCRC's follow-up activities on consumer incidents were appropriate for the severity of the situations for the ten incidents.

IV. Findings and Recommendation

Finding

Consumer # XX: The incident occurred on January 1, 2008. However the vendor did not submit the written report to TCRC until January 11, 2008.

Recommendation	Regional Center Plan/Response
TCRC should ensure that the vendor for consumer #XX reports special incidents within the required timeframes.	TCRC will provide technical assistance to ensure that the vendor serving individual #XX report special incidents within the required timeframes.

SAMPLE CONSUMERS AND SERVICE PROVIDERS/VENDORS

HCBS Waiver Review Consumers

#	UCI	CCF #	Day Program #
1	XXXXXXXX		2
2	XXXXXXXX		1
3	XXXXXXXX		7
4	XXXXXXXX		6
5	XXXXXXXX		8
6	XXXXXXXX		9
7	XXXXXXXX	2	
8	XXXXXXXX	3	
9	XXXXXXXX	1	
10	XXXXXXXX		7
11	XXXXXXXX		4
12	XXXXXXXX		
13	XXXXXXXX		4
14	XXXXXXXX		
15	XXXXXXXX		
16	XXXXXXXX		
17	XXXXXXXX		3
18	XXXXXXXX		5
19	XXXXXXXX		4
20	XXXXXXXX		
21	XXXXXXXX		
22	XXXXXXXX		
23	XXXXXXXX		
24	XXXXXXXX		
25	XXXXXXXX		
26	XXXXXXXX		
27	XXXXXXXX		
28	XXXXXXXX		
29	XXXXXXXX		
30	XXXXXXXX		
31	XXXXXXXX		
32	XXXXXXXX		
33	XXXXXXXX		
34	XXXXXXXX		
35	XXXXXXXX		
36	XXXXXXXX		
37	XXXXXXXX	Removed from sample	

#	UCI	CCF #	Day Program #
38	XXXXXXXX		
39	XXXXXXXX		
40	XXXXXXXX		
41	XXXXXXXX		
42	XXXXXXXX		
43	XXXXXXXX		
44	XXXXXXXX		
45	XXXXXXXX		
46	XXXXXXXX		
47	XXXXXXXX		
48	XXXXXXXX		
49	XXXXXXXX		
50	XXXXXXXX		
51	XXXXXXXX		
52	XXXXXXXX		
53	XXXXXXXX		

HCBS Waiver Review Service Providers

CCF#	Vendor
1	XXXXXXXX
2	XXXXXXXX
3	XXXXXXXX

Day Program#	Vendor
1	XXXXXXXX
2	XXXXXXXX
3	XXXXXXXX
4	XXXXXXXX
5	XXXXXXXX
6	XXXXXXXX
7	XXXXXXXX
8	XXXXXXXX
9	XXXXXXXX

Supplemental Sample Consumers

#	UCI
54	XXXXXXXX
55	XXXXXXXX
56	XXXXXXXX

Supplemental Sample of Terminated Consumers

#	UCI
57	XXXXXXXX

SIR Review Consumers

#	UCI	Vendor
58	XXXXXXXX	XXXXXXXX
59	XXXXXXXX	XXXXXXXX
60	XXXXXXXX	XXXXXXXX
61	XXXXXXXX	XXXXXXXX
62	XXXXXXXX	XXXXXXXX
63	XXXXXXXX	XXXXXXXX
64	XXXXXXXX	XXXXXXXX
65	XXXXXXXX	XXXXXXXX
66	XXXXXXXX	XXXXXXXX
67	XXXXXXXX	XXXXXXXX