# Redwood Coast Regional Center Home and Community-Based Services Waiver Monitoring Review Report

Conducted by:

Department of Developmental Services and Department of Health Care Services

March 2–5, 2020

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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 March 2–5, 2020, at Redwood Coast Regional Center (RCRC). The monitoring team members were Corbett Bray (Team Leader), Kathy Benson, and Bonnie Simmons from DDS, and Kevin Phomthevy 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 (IPP). Specific criteria have been developed for the review sections listed below that are derived from federal/state statutes and regulations and from the 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 18 HCBS Waiver consumers. In addition, the following supplemental sample consumer records were reviewed: 1) one consumer who had moved out of a developmental center, 2) three consumers whose HCBS Waiver eligibility had been previously terminated, 3) ten consumers who had special incidents reported to DDS during the review period of January 1 through December 31, 2020, and 4) one consumer who was enrolled in the HCBS Waiver during the review period.

The monitoring team completed visits to one community care facility (CCF) and two day programs. The team reviewed one CCF and two day program consumer records and interviewed and/or observed 17 selected sample consumers.

# **Overall Conclusion**

RCRC is in substantial compliance with the federal requirements for the HCBS Waiver program. Specific recommendations that require follow-up actions by RCRC are included in the report findings. DDS is requesting documentation of follow-up actions taken by RCRC 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 RCRC 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

Eighteen sample consumer records were reviewed for 31 documentation requirements (criteria) derived from federal and state statutes and regulations and HCBS Waiver requirements. Criterion 2.10.a was 78 percent in compliance because four of the eighteen consumer IPPs did not contain a schedule of the type and amount of all services and supports purchased by the regional center. Criteria 2.13.a and 2.13.b were each 57 percent in compliance because six of the fourteen applicable records did not contain documentation of all required quarterly face-to-face visits and reports of progress. The sample records were 94 percent in overall compliance for this review. One criterion was not applicable for this review.

RCRC's records were 94 percent in overall compliance for the collaborative reviews conducted in 2016 and in 2018.

New Enrollees: One sample consumer was reviewed for level-of-care determination prior to receipt of HCBS Waiver services. RCRC's records were 100 percent in overall compliance for this review.

#### Section III - Community Care Facility (CCF) Consumer Record Review

One consumer record was reviewed at one CCF for 19 documentation requirements (criteria) derived from Title 17, California Code of Regulations. The sample record was 100 percent in overall compliance for this review. Six criteria were not applicable for this review.

RCRC's records were 92 percent and 100 percent in overall compliance for the collaborative reviews conducted in 2018 and in 2016, respectively.

# Section IV – Day Program Consumer Record Review

Two consumer records were reviewed at two day programs for 17 documentation requirements (criteria) derived from Title 17, California Code of Regulations. The sample records were 87 percent in overall compliance for the 17 criteria for this review.

RCRC's records were 97 percent in overall compliance for the collaborative reviews conducted in 2018 and in 2016.

## Section V - Consumer Observations and Interviews

Seventeen sample consumers, or in the case of minors, their parents, were interviewed and/or observed at their CCFs, day programs, or in independent living settings. The monitoring team observed that all of the consumers were in good health and were treated with dignity and respect. All of the interviewed consumers/parents indicated that they were satisfied with their services, health and choices.

## Section VI A – Service Coordinator Interviews

Three 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

The Director of Clinical Services was interviewed using a standard interview instrument. She responded to questions regarding the monitoring of consumers with medical issues, medications, behavior plans, the coordination of medical and mental health care for consumers, clinical supports to assist service coordinators, and the clinical team's role in the Risk Management Committee and special incident reporting.

## Section VI C – Quality Assurance Interview

A community resource manager was interviewed using a standard interview instrument. She responded to questions regarding how RCRC 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

One service provider at one CCF was interviewed using a standard interview instrument. The service provider responded to questions regarding their knowledge of the consumer, the annual review process, and the monitoring of health issues, medication administration, progress, safety and emergency preparedness. The staff was familiar with the consumers and knowledgeable about their roles and responsibilities.

## Section VII B - Direct Service Staff Interviews

One CCF direct service staff was 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 was familiar with the consumers and knowledgeable about their roles and responsibilities.

#### Section VIII - Vendor Standards Review

The monitoring team reviewed one CCF utilizing a standard checklist with 23 criteria that are consistent with HCBS Waiver requirements. The reviewed vendor was in good repair with no immediate health or safety concerns observed.

#### Section IX - Special Incident Reporting

The monitoring team reviewed the records of the 18 HCBS Waiver consumers and ten supplemental sample consumers for special incidents during the review period. RCRC reported all special incidents for the sample selected for the HCBS Waiver review. For the supplemental sample, the service providers reported seven of the ten incidents to RCRC within the required timeframes, and RCRC subsequently transmitted all ten special incidents to DDS within the required timeframes. RCRC's follow-up activities for the ten 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 Redwood Coast Regional Center's (RCRC) 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

RCRC is asked to respond to questions in four 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 RCRC 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<br>Assurances  | Regional Center Assurances   |  |  |
| of-care needordeterminationsarconsistent with theReneed forceinstitutionalization.the(CTh  | he regional center ensures that consumers meet ICF/DD, ICF/DD-H,<br>r ICF/DD-N facility level-of-care requirements as a condition of initial<br>and annual eligibility for the HCBS Waiver Program.<br>egional center ensures that the regional center staff responsible for<br>ertifying and recertifying consumers' HCBS Waiver eligibility meet<br>the federal definition of a Qualified Mental Retardation Professional<br>QMRP).<br>he regional center ensures that consumers are eligible for full-scope<br>ledi-Cal benefits before enrolling them in the HCBS Waiver.  |  |  |
| Necessary<br>safeguards have<br>been taken to protect<br>the health and<br>welfare of persons<br>receiving HCBSTh<br>he<br>waiver services.Waiver services.Th<br>Ma<br>Re<br>concert<br>Th<br>Ma<br>Re<br>concert<br>Th<br>Se<br>ar<br>Th<br>ma<br>Se<br>ar<br>Th<br>Th<br>ma<br>Se<br>ar<br>ThNecessary<br> | the regional center takes action(s) to ensure consumers' rights are<br>rotected.<br>The regional center takes action(s) to ensure that the consumers'<br>ealth needs are addressed.<br>The regional center ensures that behavior plans preserve the right of<br>the regional center maintains a Risk Management, Risk Assessment<br>and Planning Committee.<br>The regional center has developed and implemented a Risk<br>lanagement/Mitigation Plan.<br>The regional center and local Community Care Licensing offices<br>bordinate and collaborate in addressing issues involving licensing<br>equirements and monitoring of CCFs pursuant to the MOU between<br>DS and Department of Social Services.<br>The regional center has developed and implemented a quality<br>ssurance plan for Service Level 2, 3 and 4 community care facilities.<br>The regional center reviews each community care facility annually to<br>ssure services are consistent with the program design and<br>oplicable laws and oversees development and implementation of<br>orrective action plans as needed.<br>The regional center conducts not less than two unannounced<br>conitoring visits to each CCF annually.<br>The revice coordinators perform and document periodic reviews (at least<br>nually) to ascertain progress toward achieving IPP objectives and<br>the consumer's and the family's satisfaction with the IPP and its<br>plementation.<br>The revice coordinators have quarterly face-to-face meetings with<br>onsumers in CCFs, family home agencies, supported living services,<br>and achieving the IPP objectives for which the service provider is<br>seponsible.<br>The regional center ensures that needed services and supports are in<br>ace when a consumer moves from a developmental center (DC) to |  |  |

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

# **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 and fair hearing rights, level of care, individual program plans (IPP) and periodic reviews and reevaluations of services. The information obtained about the consumer's needs and services is tracked as a part of the onsite program reviews.

#### II. Scope of Review

1. Eighteen HCBS Waiver consumer records were selected for the review sample.

| Living Arrangement                      | # of Consumers |
|---|----------------|
| Community Care Facility (CCF)           | 1              |
| With Family                             | 4              |
| Independent or Supported Living Setting | 13             |

2. The review period covered activity from January 1 through December 31, 2019.

## III. Results of Review

The 18 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 indicating that the consumer received face-to-face reviews every 30 days for the first 90 days after moving from a developmental center. Three supplemental records were reviewed solely for documentation that Redwood Coast Regional Center (RCRC) 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. One supplemental record was reviewed for documentation that RCRC determined the level of care prior to receipt of HCBS Waiver services.

✓ The sample records were 100 percent in compliance for 21 criteria. There are no recommendations for these criteria. One criterion was not applicable for this review.

- ✓ 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
- 2.5.b The consumer's qualifying conditions documented in the CDER are consistent with information contained in the consumer's record. [SMM 4442.5; 42 CFR 441.302(c); Title 22, CCR, §51343]

#### <u>Finding</u>

Seventeen of the eighteen (94 percent) applicable consumer records documented level-of-care qualifying conditions that were consistent with information found elsewhere in the record. For consumer #8 "outbursts" was identified as a qualifying condition on the DS 3770, but there was no supporting information in the consumer's record (IPP, progress reports, vendor reports, etc.) that described the impact of the identified condition or the need for services and supports.

| 2.5.b Recommendation   | Regional Center Plan/Response  |
|--|--|
| RCRC should determine if the item<br>listed above for consumer #8 is<br>appropriately identified as a qualifying<br>condition. The consumer's DS 3770<br>form should be corrected to ensure that<br>any items that do not represent<br>substantial limitations in the consumer's<br>ability to perform activities of daily living<br>and/or participate in community<br>activities are no longer identified as<br>qualifying conditions. If RCRC<br>determines that the issue above is<br>correctly identified as a qualifying<br>condition, documentation (updated<br>IPPs, progress reports, etc.) that<br>supports the original determination<br>should be submitted with the response<br>to this report. | The 3770 was corrected to reflect only<br>the qualifying conditions that<br>represent substantial limitations in the<br>client's ability to perform activities of<br>daily living. |

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)(l)]

# <u>Finding</u>

Sixteen of the eighteen (89 percent) sample consumer records contained documentation that the IPPs were reviewed at least annually by the planning team, and modified as necessary. The IPP for consumer #9 was reviewed on January 27, 2020. However, the previous IPP review was conducted on August 29, 2018. The IPP for consumer #18 was reviewed on February 28, 2020. However, the previous IPP review was conducted on September 7, 2018.

| 2.6.a Recommendation  | Regional Center Plan/Response   |
|---|---|
| RCRC should ensure that the IPPs for<br>consumers #9 and #18 are reviewed at<br>least annually. | Completed. The IPPs for clients #9 and<br>#18 were both reviewed in October<br>2020. which was within 12 months of<br>the prior IPPs. |

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)

# <u>Finding</u>

Ten of the eleven (91 percent) applicable sample consumer records contained a completed SARF. For consumer #6, the IPP was dated December 28, 2018. However, there was no SARF completed until January 30, 2020. Accordingly, no recommendation is required.

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.

# <u>Findings</u>

Seven of the eight (88 percent) applicable sample consumer records contained IPP addenda signed by RCRC and the consumer or, where appropriate, his/her parents, legal guardian, or conservator. Consumer #12 received dental training from March to July 2019, and began receiving new medication dispenser services in July 2019. However, addenda for these services were completed on February 11, 2020. 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). [W&I Code §4646.5(a)(2)]

# <u>Finding</u>

Seventeen of the eighteen (94 percent) sample consumer records contained IPPs that addressed the consumers' qualifying conditions. The IPP for consumer #6 did not address services and supports for the consumer's need for "assistance with medications." Subsequent to the review period, an addendum was completed that addressed services and supports for assistance with medications. Accordingly, no recommendation is required.

2.9.d The IPP addresses the services which the day program provider is responsible for implementing. [W&I Code §4646.5(a)(2)]

# **Findings**

Ten of the eleven (91 percent) applicable sample consumer records contained IPPs that addressed the consumers' day program services. However, the IPP for consumer #9 did not include the services which the day program provider is responsible for implementing. Subsequent to the review period, a new IPP was completed on January 27, 2020, that included day program services. Accordingly, there is no recommendation.

2.10.a The IPP includes a schedule of the type and amount of all services and supports purchased by the regional center. [W&I Code §4646.5(a)(5)]

# Findings

Fourteen of the eighteen (78 percent) sample consumer IPPs included a schedule of the type and amount of all services and supports purchased by RCRC. The IPP for consumer #2 did not indicate RCRC funded specialized health treatment and training services. Subsequent to the review period, RCRC provided an addendum dated February 1, 2020, that included the support purchased by the regional center. The IPP for consumer #6 did not indicate RCRC funded community activity support services. Subsequent to the review period, RCRC provided an addendum dated February 19, 2020, that included the support purchased by the regional center. The IPP for consumer #10 did not indicate RCRC funded psychiatry, personal assistant, and construction services. Subsequent to the review period, RCRC provided addendums dated February 25, 2020, that included the supports purchased by the regional center. The IPP for consumer #12 did not indicate RCRC funded personal emergency response services. Subsequent to the review period, RCRC provided an addendum dated February 11, 2020, that included the support purchased by the regional center. Accordingly, no recommendations are required for these consumers.

| 2.10.a Recommendation  | Regional Center Plan/Response  |
|--|--|
| RCRC should evaluate what actions<br>may be necessary to ensure that the<br>IPPs for all consumers include all<br>services and supports purchased by the<br>regional center. | To address this issue, RCRC<br>developed an IPP training guideline<br>that has been used to train Service<br>Coordinators (SC) and Client<br>Services Managers (CSM) to ensure<br>that IPPs include all services and<br>supports purchased by the regional<br>center. In addition, at the time of<br>each recertification, Waiver staff<br>provide direct feedback to SCs on<br>any missing information on the IPPs<br>and request correction. |

2.12 Periodic reviews 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. *[W&I Code §4646.5(a)(6)]* 

# <u>Finding</u>

Seventeen of the eighteen (94 percent) applicable sample consumer records contained documentation of periodic review and reevaluation of consumer progress at least annually. However, the record for consumer #18 did not contain documentation that the consumer's progress had been reviewed within the year. Specifically, there was no documentation (e.g., consumer signatures on a current IPP or standardized annual review form) to indicate the consumer's progress or satisfaction with implementation of the IPP.

| 2.12 Recommendation                  | Regional Center Plan/Response           |
|--------------------------------------|---|
| RCRC should ensure that a review and | The IPP for client #18 was completed in |
| reevaluation of progress regarding   | October 2020 (within 12 months of the   |
| planned services, timeframes and     | previous IPP) and included review and   |
| satisfaction for consumer #18 is     | reevaluation of progress regarding      |
| completed and documented at least    | planned services, timeframes and        |
| annually.                            | satisfaction.                           |

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*)

# <u>Findings</u>

Eight of the fourteen (57 percent) applicable sample consumer records had quarterly face-to-face meetings completed and documented. However, the records for six consumers did not meet the requirement as indicated below:

- 1. The records for consumers #5, #8, and #13 contained documentation of only three of the required meetings.
- 2. The records for consumers #6 and #7 contained documentation of only two of the required meetings.
- 3. The record for consumer #9 contained documentation of only one of the required meetings.

| 2.13.a Recommendations  | Regional Center Plan/Response  |
|---|--|
| 1. RCRC should ensure that all future<br>face-to-face meetings are completed and<br>documented each quarter for consumers<br>#5, #6, #7, #8, #9, and #13. | RCRC regularly provides training to<br>SCs, CSMs and Unit Assistants<br>regarding the importance of face-to-<br>face quarterly visits. Unit assistants<br>run monthly 'reports and contacts due'<br>SANDIS lists for all SCs. CSMs meet<br>with SCs to ensure quarterly meetings<br>and reports are completed timely.<br>RCRC will ensure all vacant<br>caseloads are covered. |
|   | All SCs and CSMs were reminded and<br>informed of the need to complete all<br>quarterly face-to-face meetings after<br>the 2020 monitoring review. CSMs<br>are working with the SCs who have<br>not conducted the required visits to<br>ensure that future visits are done as<br>required. RCRC determined that<br>vacant caseloads were a factor for<br>client #7.            |
|   | <ul> <li>#5—4 of 4 completed</li> <li>#6—3 of 4 required quarterlies were completed.</li> <li>#7—1 of 4 required quarterlies completed.</li> <li>#8—3 of 4 required quarterlies completed.</li> <li>#9—4 of 4 of required quarterlies completed or in process.</li> <li>#13—4 of 4 required quarterlies completed.</li> </ul>  |

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| 2. In addition, RCRC should evaluate<br>what actions may be necessary to ensure<br>that all future face-to-face meetings are<br>completed and documented each quarter<br>for all applicable consumers. | RCRC regularly provides training to<br>SCs, CSMs and Unit Assistants,<br>regarding the importance of face-to-<br>face quarterly visits. Unit Assistants<br>run monthly 'reports and contacts due'<br>SANDIS lists for all SCs. CSMs meet<br>with SCs to ensure quarterly meetings<br>and reports are completed timely.<br>RCRC will ensure all vacant<br>caseloads are covered. Whenever<br>there is a vacant caseload of 60 days<br>or more, the CSM who oversees the<br>vacant position shall reassign the<br>case(s) to other SC(s) for coverage. If<br>the position is to be vacant less than<br>60 days, the CSM may appoint<br>coverage of cases to other SCs<br>without having all cases reassigned in<br>SANDIS to other<br>SC(s). |
|--|--|

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**

Eight of the fourteen (57 percent) applicable sample consumer records had quarterly reports of progress completed for consumers living in community out-of-home settings. However, the records for six consumers did not meet the requirement as indicated below:

- 1. The records for consumers #5, #8, and #13 contained documentation of only three of the required quarterly reports of progress.
- 2. The records for consumers #6 and #7 contained documentation of only two of the required quarterly reports of progress.
- 3. The record for consumer #9 contained documentation of only one of the required quarterly reports of progress.

| 2.13.b Recommendations  | Regional Center Plan/Response  |
|---|--|
| 1. RCRC should ensure that future<br>quarterly reports of progress are<br>completed for consumers #5, #6, #7, #8,<br>#9, and #13. | RCRC regularly provides training to<br>SCs, CSMs and Unit Assistants,<br>regarding the importance of face-to-<br>face quarterly visits. Unit Assistants<br>run monthly 'reports and contacts due'<br>SANDIS lists for all SCs. CSMs meet<br>with SCs to ensure quarterly meetings<br>and reports are completed timely.<br>RCRC will ensure all vacant<br>caseloads are covered. Whenever<br>there is a vacant caseload of 60 days<br>or more, the CSM who oversees the<br>vacant position shall reassign the<br>case(s) to other SC(s) for coverage. If<br>the position is to be vacant less than<br>60 days, the CSM may appoint<br>coverage of cases to other SCs<br>without having all cases reassigned in<br>SANDIS to other<br>SC(s). |

| 2. In addition, RCRC should evaluate<br>what actions may be necessary to ensure<br>that all future quarterly reports of<br>progress are completed and documented<br>for all applicable consumers. | RCRC regularly provides training to<br>SCs, CSMs and Unit Assistants,<br>regarding the importance of face-to-<br>face quarterly visits. Unit Assistants<br>run monthly 'reports and contacts due'<br>SANDIS lists for all SCs. CSMs meet<br>with SCs to ensure quarterly meetings<br>and reports are completed timely.<br>RCRC will ensure all vacant<br>caseloads are covered. Whenever<br>there is a vacant caseload of 60 days<br>or more, the CSM who oversees the<br>vacant position shall reassign the<br>case(s) to other SC(s) for coverage. If<br>the position is to be vacant less than<br>60 days, the CSM may appoint<br>coverage of cases to other SCs<br>without having all cases reassigned in<br>SANDIS to other<br>SC(s). |
|---|--|
|---|--|

|       | Regional Center Consumer Record Review Summary<br>Sample Size = 18 + 4 Supplemental Records  |  |   |     |       |           |  |
|-------|--|--|---|-----|-------|-----------|--|
|       | Criteria   | +  | - | N/A | % Met | Follow-up |  |
| 2.0   | The consumer is Medi-Cal eligible. (SMM 4442.1)  | 18   |   |     | 100   | None      |  |
| 2.1   | Each record contains a Medicaid Waiver<br>Eligibility Record (DS 3770), signed by a<br>Qualified Mental Retardation Professional<br>(QMRP), which documents the date of the<br>consumer's initial HCBS Waiver eligibility<br>certification, annual recertifications, the<br>consumer's qualifying conditions and short-<br>term absences.<br>[SMM 4442.1; 42 CFR 483.430(a)]   | Criterion 2.1 consists of four sub-criteria (2.1.a-d) that are reviewed and rated independently. |   |     |       |           |  |
| 2.1.a | The DS 3770 is signed by a QMRP and the title "QMRP" appears after the person's signature.   | 18   |   |     | 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.  | 18   |   |     | 100   | None      |  |
| 2.1.c | The DS 3770 form documents annual re-<br>certifications.   | 18   |   |     | 100   | None      |  |
| 2.1.d | The DS 3770 documents short-term absences of 120 days or less, if applicable.  |  |   | 18  | NA    | None      |  |
| 2.2   | Each record contains a dated and signed<br>Medicaid Waiver Consumer Choice of<br>Services/Living Arrangements form<br>(DS 2200). [SMM 4442.7; 42 CFR<br>441.302(d)]  | 18   |   |     | 100   | None      |  |
| 2.3   | There is a written notification of a proposed<br>action and documentation that the consumer<br>has been sent written notice of their fair<br>hearing rights whenever choice of living<br>arrangements is not offered, services or<br>choice of services are denied, the<br>consumer/parent/legal guardian or legal<br>representative does not agree with all, or part,<br>of the components in the consumer's IPP, or<br>the consumer's HCBS Waiver eligibility has<br>been terminated. <i>[SMM 4442.7; 42 CFR Part<br/>431, Subpart E; W&amp;I Code §4646(g)]</i> | 3  |   | 18  | 100   | None      |  |

| Regional Center Consumer Record Review Summary<br>Sample Size = 18 + 4 Supplemental Records |  |    |   |     |       |                  |
|---|--|----|---|-----|-------|------------------|
|   | Criteria   | +  | - | N/A | % Met | Follow-up        |
| 2.4   | Each record contains a current Client<br>Development Evaluation Report (CDER) that<br>has been reviewed within the last 12 months.<br>(SMM 4442.5; 42 CFR 441.302)   | 18 |   |     | 100   | None             |
| 2.5.a   | The consumer's qualifying conditions and any<br>special health care requirements used to<br>meet the level-of-care requirements for care<br>provided in an ICF/DD, ICF/DD-H, and<br>ICF/DD-N facility are documented in the<br>consumer's CDER and other assessments.<br>(SMM 4442.5; 42 CFR 441.302(c); Title 22,<br>CCR, §51343) | 18 |   |     | 100   | None             |
| 2.5.b   | The consumer's qualifying conditions<br>documented in the CDER are consistent with<br>information contained in the consumer's<br>record.   | 17 | 1 |     | 94    | See<br>Narrative |
| 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.<br>[42 CFR 441.301(b)(1)[]  | 16 | 2 |     | 87    | See<br>Narrative |
| 2.6.b   | The HCBS Waiver Standardized Annual<br>Review Form is completed and signed<br>annually by the planning team to document<br>whether or not a change to the existing IPP is<br>necessary, and health status and CDER have<br>been reviewed. (HCBS Waiver requirement)  | 10 | 1 | 7   | 91    | See<br>Narrative |
| 2.7.a   | The IPP is signed, prior to its implementation,<br>by an authorized representative of the<br>regional center and the consumer, or where<br>appropriate, his/her parents or legal guardian<br>or conservator. [W&I Code §4646(g)]   | 18 |   |     | 100   | None             |
| 2.7.b   | IPP addenda are signed by an authorized<br>representative of the regional center and the<br>consumer, or where appropriate, his/her<br>parents, legal guardian, or conservator.  | 7  | 1 | 10  | 86    | See<br>Narrative |
| 2.7.c   | The IPP is prepared jointly with the planning team. [W&I Code §4646(d)]  | 18 |   |     | 100   | None             |
| 2.8   | The IPP includes a statement of goals based<br>on the needs, preferences and life choices of<br>the consumer. [W&I Code §4646.5(a)]  | 18 |   |     | 100   | None             |

|        | Regional Center Consumer Record Review Summary<br>Sample Size = 18 + 4 Supplemental Records   |  |   |     |       |                  |
|--------|---|--|---|-----|-------|------------------|
|        | Criteria  | +  | - | N/A | % Met | Follow-up        |
| 2.9    | The IPP addresses the consumer's goals and needs. <i>[W&amp;I Code §4646.5(a)(2)]</i>   | Criterion 2.9 consists of seven sub-<br>criteria (2.9.a-g) that are reviewed<br>independently. |   |     |       |                  |
| 2.9.a  | The IPP addresses the qualifying conditions identified in the CDER and Medicaid Waiver Eligibility Record (DS 3770).  | 17   | 1 |     | 94    | See<br>Narrative |
| 2.9.b  | The IPP addresses special health care requirements.   | 5  |   | 13  | 100   | None             |
| 2.9.c  | The IPP addresses the services which the CCF provider is responsible for implementing.  | 1  |   | 17  | 100   | None             |
| 2.9.d  | The IPP addresses the services which the day program provider is responsible for implementing.  | 10   | 1 | 7   | 91    | See<br>Narrative |
| 2.9.e  | The IPP addresses the services which the supported living services agency or independent living services provider is responsible for implementing.  | 14   |   | 4   | 100   | None             |
| 2.9.f  | The IPP addresses the consumer's goals, preferences and life choices.   | 18   |   |     | 100   | None             |
| 2.9.g  | The IPP includes a family plan component if the consumer is a minor. [W&I Code §4685(c)(2)]   | 2  |   | 16  | 100   | None             |
| 2.10.a | The IPP includes a schedule of the type and<br>amount of all services and supports<br>purchased by the regional center.<br>[W&I Code §4646.5(a)(4)]   | 14   | 4 |     | 78    | See<br>Narrative |
| 2.10.b | The IPP includes a schedule of the type and<br>amount of all services and supports obtained<br>from generic agencies or other resources.<br>[W&I Code §4646.5(a)(4)]  | 18   |   |     | 100   | None             |
| 2.10.c | The IPP specifies the approximate scheduled start date for the new services. [W&I Code §4646.5(a)(4)]   | 8  |   | 10  | 100   | None             |
| 2.11   | The IPP identifies the provider or providers of<br>service responsible for implementing<br>services, including but not limited to vendors,<br>contract providers, generic service agencies<br>and natural supports.<br>[W&I Code §4646.5(a)(4)] | 18   |   |     | 100   | None             |

|        | Regional Center Consumer Record Review Summary<br>Sample Size = 18 + 4 Supplemental Records  |    |   |     |       |                  |  |
|--------|--|----|---|-----|-------|------------------|--|
|        | Criteria   | +  | - | N/A | % Met | Follow-up        |  |
| 2.12   | Periodic reviews and reevaluations of<br>consumer progress are completed (at least<br>annually) to ascertain that planned services<br>have been provided, that consumer progress<br>has been achieved within the time specified,<br>and the consumer and his/her family are<br>satisfied with the IPP and its implementation.<br>[W&I Code §4646.5(a)(6)]                        | 17 | 1 |     | 94    | See<br>Narrative |  |
| 2.13.a | Quarterly face-to-face meetings are<br>completed for consumers living in community<br>out-of-home settings, i.e., Service Level 2, 3<br>or 4 community care facilities, family home<br>agencies or supported living and independent<br>living settings. ( <i>Title 17, CCR, §56047; Title</i><br><i>17, CCR, §56095; Title 17, CCR, §58680;</i><br><i>Contract requirement</i> ) | 8  | 6 | 4   | 57    | See<br>Narrative |  |
| 2.13.b | Quarterly reports of progress are completed<br>for consumers living in community out-of-<br>home settings, i.e., Service Level 2, 3 or 4<br>community care facilities, family home<br>agencies or supported living and independent<br>living settings. ( <i>Title 17, CCR, §56047; Title</i><br><i>17, CCR, §56095; Title 17, CCR, §58680;</i><br><i>Contract requirement</i> )  | 8  | 6 | 4   | 57    | See<br>Narrative |  |
| 2.14   | Face-to-face reviews are completed no less<br>than once every 30 days for the first 90 days<br>following the consumer's move from a<br>developmental center to a community living<br>arrangement. (W&I Code §4418.3)   | 1  |   | 18  | 100   | None             |  |

# SECTION III

# COMMUNITY CARE FACILITY CONSUMER RECORD REVIEW

#### I. Purpose

The review addresses the requirements for community care facilities (CCF) 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

One consumer record was reviewed at one CCF visited by the monitoring team. The facilities' consumer record was reviewed to determine compliance with 19 criteria.

III. Results of Review

The consumer records were 100 percent in compliance for 12 criteria. Seven criteria were not applicable for this review.

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

|       | Community Care Facility Record Review Summary<br>Sample Size: Consumers = 1; CCFs = 1  |   |   |     |       |           |  |  |
|-------|--|---|---|-----|-------|-----------|--|--|
|       | Criteria   | + | - | N/A | % Met | Follow-up |  |  |
| 3.4.a | Service Level 2 and 3 facilities prepare and<br>maintain written semiannual reports of<br>consumer progress.<br>[Title 17, CCR, §56026(b)]   |   |   | 1   | NA    | 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   | NA    | None      |  |  |
| 3.5.a | Service Level 4 facilities prepare and<br>maintain written quarterly reports of<br>consumer progress.<br>[Title 17, CCR, §56026(c)]  | 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.                                   | 1 |   |     | 100   | None      |  |  |
| 3.5.c | Quarterly reports include a summary of data collected. ( <i>Title 17, CCR,</i> §56013(d)(4); <i>Title 17, CCR,</i> §56026)   | 1 |   |     | 100   | None      |  |  |
| 3.6.a | The facility prepares and maintains ongoing,<br>written consumer notes, as required by<br>Title 17. <i>[Title 17, CCR, §56026(a)]</i>  | 1 |   |     | 100   | None      |  |  |
| 3.6.b | The ongoing notes/information verify that behavior needs are being addressed.  |   |   | 1   | NA    | 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>                     |   |   | 1   | NA    | None      |  |  |
| 3.7.b | A written report of the special incident is<br>submitted to the regional center within 48<br>hours after the occurrence of the special<br>incident. <i>(Title 17, CCR, §54327)</i> |   |   | 1   | 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>  |   |   | 1   | 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

Two consumer records were reviewed at two 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 percent in compliance for 12 criteria.

- ✓ A summary of the results of the review is shown in the table at the end of this section.
- ✓ Findings for five criteria are detailed below.
- 4.1.h The consumer record identifies and addresses the special safety and behavior needs of the consumer. (*Title 17, CCR, §56730*)

## <u>Finding</u>

One of the two applicable sample consumer records identified and addressed the special safety and behavior needs of the consumer. The record for consumer #9 at day program #2 did not address the special safety and behavior needs of the consumer.

| 4.1.h Recommendation   | Regional Center Plan/Response  |
|--|--|
| RCRC should ensure that day program<br>#2 identifies the special safety and<br>behavior needs for consumer #9 in the<br>consumer's record. | RCRC Community Services staff<br>provided technical assistance to day<br>program #2. Day program records now<br>contain documentation to address the<br>special safety and behavior needs of<br>client #9. |

4.3.a The day program develops, maintains, and modifies, as necessary, documentation regarding the manner in which it will assist the consumer in achieving the IPP/Individual Service Plan (ISP) objectives for which the day program is responsible. *[Title 17, CCR, §56720)(a)]* 

# Findings

One of the two (50 percent) sample consumer records contained documentation on how the day program provider will assist the consumer in achieving their IPP/ISP objectives. However, the record for consumer #9 at day program #2 had no specific program plan or other documentation describing how they will assist the consumers in achieving their objectives.

| 4.3.a Recommendation  | Regional Center Plan/Response  |
|---|--|
| RCRC should ensure that day<br>program #2 develops and maintains<br>documentation on how the program<br>will assist consumer #9 in achieving<br>their IPP/ISP objectives. | After the 2020 Monitoring review, RCRC<br>Community Service staff and Director<br>provided technical assistance to day<br>program #2. ISPs and required<br>documentation are completed and are<br>ongoing. |

4.3.b The day program's (ISP) or other program documentation is consistent with the consumer's IPP objectives for which the day program is responsible.

## Finding

One of the two (50 percent) sample consumer records contained documentation consistent with the consumer's IPP objectives for which the day program is responsible. However, the record for consumer #9 at day program #2 did not identify the supports in place to address the consumer's behavior, art and socialization, community integration, and independence objectives, as stated in the IPP.

| 4.3.b Recommendation  | Regional Center Plan/Response   |
|---|---|
| RCRC should ensure that the record for<br>consumer #9 at day program #2<br>identifies supports in place to address<br>the consumer's objectives, as stated in<br>the IPP. | RCRC Community Services staff<br>provided technical assistance to day<br>program #2. The records for client #9 at<br>day program #2 identify supports in<br>place to address the client's objectives<br>as stated in the IPP. |

4.4.a The day program prepares and maintains written semiannual reports of the consumer's performance and progress. *[Title 17, CCR, §56720(c)]* 

## Finding

One of the two (50 percent) applicable sample consumer day program records contained written semiannual reports of consumer progress. However, the records for consumer #9 at day program #2 did not contain any of the required progress reports.

| 4.4.a Recommendation   | Regional Center Plan/Response  |
|--|--|
| RCRC should ensure that day program<br>provider #2 prepares written<br>semiannual reports of consumer<br>progress. | After the 2020 Monitoring review, RCRC<br>Community Service staff and Director<br>provided technical assistance to day<br>program #2. ISPs and required<br>semiannual reports are being completed. |

|       | Day Program Record Review Summary<br>Sample Size: Consumers = 2; Day Programs = 2  |   |  |     |       |           |  |
|-------|--|---|--|-----|-------|-----------|--|
|       | Criteria   | + |  | N/A | % Met | Follow-up |  |
| 4.1   | An individual consumer file is maintained by<br>the day program that includes the documents<br>and information specified in Title 17.<br><i>(Title 17, CCR, §56730)</i>  | 2 |  |     | 100   | None      |  |
| 4.1.a | The consumer record contains current<br>emergency and personal identification<br>information including the consumer's address,<br>telephone number; names and telephone<br>numbers of residential care provider, relatives,<br>and/or guardian or conservator; physician<br>name(s) and telephone number(s); pharmacy<br>name, address and telephone number; and<br>health plan, if appropriate. | 2 |  |     | 100   | None      |  |
| 4.1.b | The consumer record contains current health<br>information that includes current medications;<br>known allergies; medical disabilities; infectious,<br>contagious, or communicable conditions;<br>special nutritional needs; and immunization<br>records.  | 2 |  |     | 100   | None      |  |
| 4.1.c | The consumer record contains any medical,<br>psychological, and social evaluations<br>identifying the consumer's abilities and<br>functioning level, provided by the regional<br>center.   | 2 |  |     | 100   | None      |  |
| 4.1.d | The consumer record contains an<br>authorization for emergency medical treatment<br>signed by the consumer and/or the authorized<br>consumer representative.   | 2 |  |     | 100   | None      |  |
| 4.1.e | The consumer record contains documentation<br>that the consumer and/or the authorized<br>consumer representative has been informed of<br>his/her personal rights.  | 2 |  |     | 100   | None      |  |
| 4.1.f | Data is collected that measures consumer<br>progress in relation to the services addressed<br>in the IPP which the day program provider is<br>responsible for implementing.  | 2 |  |     | 100   | None      |  |
| 4.1.g | The consumer record contains up-to-date case notes reflecting important events or information not documented elsewhere.  | 2 |  |     | 100   | None      |  |

|       | Day Program Record Review Summary<br>Sample Size: Consumers = 2; Day Programs = 2  |   |   |     |       |               |  |
|-------|--|---|---|-----|-------|---------------|--|
|       | Criteria   | + | - | N/A | % Met | Follow-up     |  |
| 4.1.h | The consumer record contains documentation that special safety and behavior needs are being addressed.   | 1 | 1 |     | 50    | See Narrative |  |
| 4.2   | The day program has a copy of the consumer's current IPP.<br>[Title 17, CCR, §56720(b)]  | 2 |   |     | 100   | None          |  |
| 4.3.a | The day program provider develops,<br>maintains, and modifies, as necessary,<br>documentation regarding the manner in which<br>it implements the services addressed in the<br>IPP. <i>[Title 17, CCR, §56720(a)]</i> | 1 | 1 |     | 50    | See Narrative |  |
| 4.3.b | The day program's individual service plan or<br>other program documentation is consistent<br>with the services addressed in the consumer's<br>IPP.   | 1 | 1 |     | 50    | See Narrative |  |
| 4.4.a | The day program prepares and maintains<br>written semiannual reports.<br>[ <i>Title 17, CCR,</i> §56720(c)]  | 1 | 1 |     | 50    | See Narrative |  |
| 4.4.b | Semiannual reports address the consumer's performance and progress relating to the services which the day program is responsible for implementing.   | 2 |   |     | 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>   |   |   | 2   | N/A   | None          |  |
| 4.5.b | A written report of the special incident is<br>submitted to the regional center within 48<br>hours after the occurrence of the special<br>incident. <i>(Title 17, CCR, §54327)</i>                                   |   |   | 2   | N/A   | None          |  |
| 4.5.c | There is appropriate follow-up to special incidents to resolve the issue and eliminate or mitigate future risk. <i>(Title 17, CCR, §54327)</i>   |   |   | 2   | N/A   | 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, choices, and regional center services.

II. Scope of Observations and Interviews

Seventeen of the 18 consumers, or in the case of minors, their parents, were interviewed and/or observed at their day programs, employment sites, community care facilities (CCF), or in independent living settings.

- $\checkmark$  Nine adult consumers agreed to be interviewed by the monitoring teams.
- ✓ Six consumers did not communicate verbally or declined an interview, but were observed.
- ✓ Two interviews were conducted with a parent of a minor.
- ✓ One consumer was unavailable for interview.
- III. Results of Observations and Interviews

All consumers and parents of minors 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.

# 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 individual program plan (IPP)/annual review process, and how they monitor services, health and safety issues.

#### II. Scope of Interviews

- 1. The monitoring team interviewed three Redwood Coast Regional Center (RCRC) 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.
  - $\checkmark$  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 RCRC's medical director and online resources for medication.

4. The service coordinators monitor the consumers' services, health and safety during periodic visits. They are aware of the consumers' health issues. The service coordinators are knowledgeable about the special incident reporting process and work with the vendors to ensure all special incidents are reported and appropriate follow-up activities are completed.

# 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. This interview 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 monitoring team interviewed Redwood Coast Regional Center's (RCRC) Director of Clinical Services.
- 2. The questions in the interview cover the following topics: routine monitoring of consumers with medical issues: medications; 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 the risk management, assessment and planning committee; and special incident reports.

## III. Results of Interview

The RCRC clinical services team consists of physicians, registered nurses, psychologists, a psychiatrist, behaviorists, an autism specialist, dental coordinators, and a dietician.

The clinical team monitors consumers with medical issues identified during the development of the individual program plan (IPP), special incident reports (SIR) and through referrals made by the service coordinators. As a result, consumer-specific plans may be developed which could include referrals to specialists, RCRC specialty clinics or Telemedicine Assessment and Consultation Team (TACT). The TACT program offers multi-disciplinary clinical services to consumers and their families via videoconferencing. The TACT team is available to provide ongoing support and follow up as needed.

Members of the clinical team collaborate with the consumers' primary care physician in the coordination of care. The clinical team nurses are involved with all hospitalizations to ensure appropriate discharge planning and follow-up. The clinical staff monitors consumers with polypharmacy or medication-related issues. The team has developed a medication checklist which assists the service coordinators to identify medication concerns. Nurses are available to provide medication training to service coordinators and providers as needed.

The clinical team has numerous supports in place to assist service coordinators to carry out their responsibilities. RCRC provides continuing education for staff and service providers on topics such as medication management, developmental disabilities and medical complexities, flu, staph infections, end-of-life issues, and coordination of health care. Some of these supports also include video-conference presentations at all RCRC offices. The clinical staff maintains a library of DVDs that can be loaned to consumers, families, vendors, and regional center staff.

The clinical team is involved with consumers' behavioral plans and mental health issues. A behaviorist and psychologist are available to review behavior plans, SIRs, and provide support and training to consumers, families and providers. Clinical team members also have a role in the coordination of mental health services for consumers with issues identified through mental health reports, the IPP process, and by referrals from service coordinators.

RCRC has improved consumer access to preventative health care resources by providing:

- ✓ Advocacy for consumers with local health care providers;
- Development of community-based services with emphasis on behavior, mental health and psychiatry;
- ✓ Specialty pediatric clinics including nutrition and psychiatry;
- Dental coordinators who provide desensitization training and support for consumers, and work with local hospitals and dental providers;
- Grant from University of California, San Francisco (UCSF) to provide training to local physicians regarding rare developmental conditions; and,
- RCRC psychiatrist whose specialty is developmental disabilities available to work collaboratively with local hospitals, medical providers.

Clinical team members participate in RCRC's Risk Management, Assessment and Planning Committee. Clinical staff review all health and death special incidents, provide feedback, recommendations and, if necessary, increased clinical services. The regional center utilizes Mission Analytics Group, Inc., the State's risk management contractor, to analyze special incidents for trends. This information is used to make recommendations for appropriate follow-up and training as needed. The team also participates in RCRC's mortality review committee.

# SECTION VI C

# QUALITY ASSURANCE INTERVIEW

#### I. Purpose

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

#### II. Scope of Interview

The monitoring team interviewed a community resource manager, who is part of the team responsible for conducting Redwood Coast Regional Center's (RCRC) QA activities.

- III. Results of Interview
  - Service coordinators function as facility liaisons to CCFs. RCRC contracted staff conduct one comprehensive annual Title 17 monitoring review and two unannounced visits to CCFs per year. Review reports are provided to facility liaisons, community resource managers, and the Client Services Manager. Each review utilizes standardized report forms and checklists based on Title 17 regulations. The community resource manager or liaisons may conduct additional unannounced visits to facilities with identified issues that require further follow-up review. The community resource manager is responsible for writing a corrective action plan (CAP) if significant issues are discovered, and CAPs are overseen by RCRC's Director of Clinical Services.
  - Service coordinators and the community resource manager review and investigate special incident reports (SIR) in collaboration with Community Care Licensing or law enforcement, as needed. They commonly conduct follow-up for SIRs related to specific consumers or vendors with a history of problems.
  - 3. The community resource manager is responsible for analyzing data from SIRs and QA monitoring. When issues of concern are identified, the information is presented to the Risk Management, Assessment and Planning Committee in order to assist in identifying possible remedial measures.

4. RCRC uses information collected from the various monitoring activities, such as cross-reporting and sharing reports with Community Care Licensing on a quarterly basis, to provide technical assistance and training for providers. Topics have included preventing sexual and physical abuse, changing regulations, the HCBS final rule, medication side effects, symptoms of medical conditions, and special needs of elderly consumers.

# 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 individual program plan (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; and how they monitor safety and safeguard medications.

#### II. Scope of Interviews

- 1. The monitoring team interviewed one service provider at one community care facility (CCF) where services are provided to the consumer who was 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.
  - $\checkmark$  The questions in the second category are related to general areas.

## III. Results of Interviews

- 1. The service provider was familiar with the strengths, needs and preferences of their consumer.
- The service provider indicated that they conducted assessments of the consumer, participated in their IPP development, provided the programspecific services addressed in the IPPs and attempted to foster the progress of their consumer.
- 3. The service provider monitored the consumer's health issues and safeguarded medications.
- 4. The service provider communicated with people involved in the consumer's life and monitored progress.
- 5. The service provider was prepared for emergencies, monitored the safety of the consumer, 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 know the consumers and their understanding of the individual program plan (IPP) and service delivery requirements, how they communicate, their level of preparedness to address safety issues, their understanding of emergency preparedness, and their knowledge about safeguarding medications.

#### II. Scope of Interviews

- 1. The monitoring team interviewed one direct service staff at one community care facility (CCF) where services are provided to the consumer who was 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.
  - $\checkmark$  The questions in the second category are related to general areas.

## III. Results of Interviews

- 1. The direct service staff was familiar with the strengths, needs and preferences of their consumer.
- The direct service staff was knowledgeable about their role and responsibilities for providing the services addressed in the consumer's IPP.
- 3. The direct service staff demonstrated that they understood the importance of communication with all individuals concerned with the consumer.
- 4. The direct service staff was prepared to address safety issues and emergencies and was familiar with special incident reporting requirements.
- 5. The direct service staff demonstrated an understanding about emergency preparedness.
- 6. The direct service staff was 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 (CCF) and day programs are serving consumers in a safe, healthy and positive environment where their rights are respected. The review also ensures that CCFs are meeting the Home and Community-Based Services Waiver definition of a homelike setting.

#### II. Scope of Review

- 1. The monitoring teams reviewed one CCF.
- 2. The team used a monitoring review checklist consisting of 24 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

The CCF was found to be in good condition with no immediate health and safety concerns.

# 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

- Special incident reporting of deaths by Redwood Coast Regional Center (RCRC) was reviewed by comparing deaths entered into the Client Master File for the review period with special incident reports (SIR) of deaths received by the Department of Developmental Services (DDS).
- 2. The records of the 18 consumers selected for the Home and Community-Based Services 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, 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. RCRC reported all deaths during the review period to DDS.
  - 2. RCRC reported all special incidents in the sample of 18 records selected for the HCBS Waiver review to DDS.
  - 3. RCRC's vendors reported seven of the ten (70 percent) incidents in the supplemental sample within the required timeframes.
  - 4. RCRC reported all ten (100 percent) incidents to DDS within the required timeframes.
  - 5. RCRC's follow-up activities on consumer incidents were appropriate for the severity of the situations for the ten incidents.

## IV. Finding and Recommendation

<u>Consumer #SIR 22:</u> The incident occurred on July 13, 2019. However, the vendor did not submit a written report to RCRC until July 16, 2019.

<u>Consumer #SIR 26:</u> The incident occurred on July 5, 2019. However, the vendor did not submit a written report to RCRC until July 8, 2019.

<u>Consumer #SIR 27:</u> The incident occurred on November 8, 2019. However, the vendor did not submit a written report to RCRC until November 12, 2019.

| Recommendation   | Regional Center Plan/Response   |
|--|---|
| RCRC should ensure that the<br>vendors for consumers #SIR 22,<br>#SIR 26, and #SIR 27 report special<br>incidents within the required<br>timeframes. | RCRC Community Services staff<br>provided and continues to provide<br>technical assistance to both of the<br>vendors who had late reporting on SIR<br># 22, 26, 27. In addition, SIR<br>requirements and timeline information is<br>included in the vendor portal on the<br>RCRC website.<br>RCRC SIR Coordinator notifies<br>Community Service staff of vendors<br>who report outside of required timelines.<br>When notified, Community Services<br>staff follows up with the vendor and<br>provides technical assistance regarding<br>SIR timelines. |

# SAMPLE CONSUMERS AND SERVICE PROVIDERS/VENDORS

| #  | UCI    | CCF | DP |
|----|--------|-----|----|
| 1  | XXXXXX | 1   |    |
| 2  | XXXXXX |     |    |
| 3  | XXXXXX |     |    |
| 4  | XXXXXX |     |    |
| 5  | XXXXXX |     |    |
| 6  | XXXXXX |     |    |
| 7  | XXXXXX |     |    |
| 8  | XXXXXX |     |    |
| 9  | XXXXXX |     | 2  |
| 10 | XXXXXX |     | 1  |
| 11 | XXXXXX |     |    |
| 12 | XXXXXX |     |    |
| 13 | XXXXXX |     |    |
| 14 | XXXXXX |     |    |
| 15 | XXXXXX |     |    |
| 16 | XXXXXX |     |    |
| 17 | XXXXXX |     |    |
| 18 | XXXXXX |     |    |

# **HCBS Waiver Review Consumers**

## **DC Mover**

| #     | UCI    |
|-------|--------|
| DC-19 | XXXXXX |

# Supplemental Sample Terminated Waiver Consumers

| #   | UCI    |
|-----|--------|
| T-1 | XXXXXX |
| T-2 | XXXXXX |
| T-3 | XXXXXX |

## **New Enrollees**

| #    | UCI    |
|------|--------|
| NE-1 | XXXXXX |

# **HCBS Waiver Review Service Providers**

| CCF # | Vendor |
|-------|--------|
| 1     | XXXXXX |

| Day Program # | Vendor |
|---------------|--------|
| 1             | XXXXXX |
| 2             | XXXXXX |

# **SIR Review Consumers**

| #      | UCI    | Vendor |
|--------|--------|--------|
| SIR 20 | XXXXXX | XXXXXX |
| SIR 21 | XXXXXX | XXXXXX |
| SIR 22 | XXXXXX | XXXXXX |
| SIR 23 | XXXXXX | XXXXXX |
| SIR 24 | XXXXXX | XXXXXX |
| SIR 25 | XXXXXX | XXXXXX |
| SIR 26 | XXXXXX | XXXXXX |
| SIR 27 | XXXXXX | XXXXXX |
| SIR 28 | XXXXXX | XXXXXX |
| SIR 29 | XXXXXX | XXXXXX |