



ODP Announcement

Home and Community Based Services Settings Provider Self-Assessment Update 5

ODP Communication Number 108-18

The mission of the Office of Developmental Programs is to support Pennsylvanians with developmental disabilities to achieve greater independence, choice and opportunity in their lives.

AUDIENCE: Providers of Residential Services, Community Participation Support, and/or Day Habilitation Services in the Adult Community Autism Program (ACAP) or the Consolidated, Community Living, Person/Family Directed Support (P/FDS) and Adult Autism Waivers.

PURPOSE: The purpose of this announcement is to update providers about the Office of Developmental Programs' (ODP) progress on the Home and Community Based Services (HCBS) Settings Provider Self-Assessments.

DISCUSSION:

Reports for Completed Self-Assessments

In the last communication about the HCBS Settings Provider Self-Assessment (update 4), ODP stated that all providers who completed a self-assessment would receive feedback by November 30, 2018. We are pleased to announce that as of December 6, 2018, all Residential providers were emailed their self-assessment reports and guidance for any needed corrective actions. Providers are encouraged to email RA-PWODPHCBSSETTINGS@pa.gov if a report has not been received for a Residential service location for which a self-assessment was submitted.

ODP is now working on developing the self-assessment reports and guidance that will be sent to Non-Residential providers (Community Participation Support and/or Day Habilitation). ODP will start emailing this information to providers on December 31, 2018. It should take about a month for all reports and guidance to be sent for every service location. Non-Residential

providers should email RA-PWODPHCBSSETTINGS@pa.gov if a report has not been received by January 31, 2019, for a service location for which a self-assessment was submitted.

Onsite Assessments For Active Service Locations Where a Self-Assessment Was Not Submitted

On October 1, 2018, ODP contacted Residential and Non-Residential providers for which a self-assessment for an active service location was not submitted and informed them that an onsite assessment would be scheduled. Our current analysis shows 4 Residential service locations and 19 Non-Residential service locations that meet this criteria. Staff from ODP will be completing the onsite assessments for Residential service locations and Administrative Entity staff will be completing the onsite assessments for Non-Residential service locations. Providers who will receive an onsite assessment should be contacted by staff from ODP or an Administrative Entity in the near future to discuss and schedule the onsite assessment. It is our goal to complete all onsite assessments by March 31, 2019.

Frequently Asked Questions

Through the HCBS Settings Provider Self-Assessment process, there have been some frequently asked questions and concerns that ODP wanted to clarify to all providers involved in this process:

- **Whom should providers communicate with regarding their corrective actions?** ODP has communicated through email to the Residential providers, and will be communicating the same information to Non-Residential providers, that any areas indicated on the self-assessment report where action is/may be needed, the provider is encouraged to keep internal documentation on any corrective action. If further action is required based on the provider's response in the self-assessment report, providers have 60 calendar days to correct all issues identified as a result of the responses submitted in the self-assessment for each service location. **If the provider is unable to correct any issue within 60 calendar days, the provider must complete a Corrective Action Plan (CAP). If a CAP is needed, please use the [CAP Template](#).** In general, a CAP should be completed for each service location relevant to corrections needed at that service location. The provider does not need to submit the CAP to anyone (or any corrections made on the self-assessment report), but is responsible for maintaining and updating the CAP quarterly, until the concern is remediated. ODP staff will select a random sample of providers to review documentation that corrective action has been completed or that a CAP has been developed. Documentation of completion of corrective action and CAPs will also be completed as part of the Quality Assurance and Improvement (QA&I) process.
- **With whom should providers communicate, if they made a mistake on the response given to a question?** As stated above, it is recommended that each provider keep internal documentation on each service location's self-assessment report with any corrections made, which includes if a question was answered in a way that was not accurate.
- **Why do some questions show on the self-assessment report that were not asked while completing the self-assessment?** Logic was built into certain questions within the

Residential and Non-Residential Self-Assessments. This means that some questions were asked only if a response to a separate question indicated that those questions were applicable. For example, in the Residential Self-Assessment there is a question asking if there is a secure place at the service location for each individual to store personal belongings. If the person completing the self-assessment answered no, an additional question showed up asking for an explanation as to why there wasn't a secure place to store belongings. If the person completing the self-assessment answered yes, no additional question was asked because it wasn't applicable. On the self-assessment report, however, all questions are shown. If a provider did not answer a question due to the logic that was built into the self-assessment, these questions generated a populated response "no response given".

- **In reference to the Residential HCBS Settings Provider Self-Assessment, some providers have answered "no" to the question, "Is independent living technology or remote monitoring used at this service location" but the report shows that the following two related questions contain a response from ODP that "action is needed".** There was an error in the logic for these questions on the self-assessment report. If the provider does not render independent living technology or remote monitoring for any individual at the service location, there is no further action needed for the following two questions which are, "Does the service location staff inform all impacted individuals and anyone identified by the individuals of what impact the independent living technology will have on the individual's privacy?" and "Has consent to use independent living technology been obtained from each impacted individual in writing?". Providers are still encouraged to read the [Residential HCBS Self-Assessment Correction Guidance](#) on the questions relating to independent living technology and remote monitoring to ensure they understand what is covered by this type of technology and monitoring and whether they might be able to incorporate this type of support in the future to benefit individuals receiving services.

Please be advised that ODP has received a large quantity of emails and phone calls from providers. As a result, it has been taking longer than expected to respond to each provider individually. ODP wants to thank you for your ongoing patience throughout this HCBS Settings Provider Self-Assessment process.

For any questions related to this communication, please contact RA-PWODPHCBSSETTINGS@pa.gov