2018 Provider Quality Management Self-Assessment

October 2018
Objectives

- Overview of the Home and Community Based Services (HCBS) Provider Quality Oversight process
- Familiarize providers with updates to the 2018 Self-Assessment
- Identify and address frequently asked questions
- Provide resources for technical support
2018 Self-Assessment

• The process is currently underway on the HCBS 2018 Provider Quality Management Self-Assessment Form 470-4547 with submission to occur by December 1, 2018.

• The submission of the self-assessment and participation in IME HCBS quality oversight activities is required for certain provider types to maintain enrollment as an Iowa Medicaid provider.

• A provider who fails to maintain enrollment with Iowa Medicaid will also lose enrollment with any contracted managed care companies.
Four Methods of Provider Oversight

- Self-Assessment
- Focused Desk Review
- Targeted Review
- Periodic On-Site Review
<table>
<thead>
<tr>
<th></th>
<th>Periodic Review</th>
<th>Focused Review</th>
<th>Targeted Review</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>What</strong></td>
<td>Full review of required policies, procedures, and evidence</td>
<td>Reviews a select focus area that changes annually</td>
<td>Reviews areas of concern affecting health and safety and service quality</td>
</tr>
<tr>
<td><strong>Where</strong></td>
<td>On-site</td>
<td>Desk or on-site review</td>
<td>Desk or on-site review</td>
</tr>
<tr>
<td><strong>When</strong></td>
<td>Occur on a five year cycle, or as the provider’s certification expires</td>
<td>Yearly sample group of providers</td>
<td>As needed due to concerns</td>
</tr>
</tbody>
</table>
Self-Assessment

• Annual self-reporting tool on standards for identified HCBS waiver providers.
  – Covered services are identified in Section B of the self-assessment
• Standards come from
  – Code of Federal Regulations (CFR)
  – Iowa Code
  – Iowa Administrative Code (IAC)
  – Best practice recommendations
• May require the development of corrective action plans
Quality Providers

- Annual Provider Self Assessment
- Internal Quality Improvement Activities
- HCBS Quality Oversight Reviews
2018 Self-Assessment
General Updates

• Form content and submission method remains the same
  – Fillable PDF document, submitted via email
  – Electronic signatures

• Continue to implement the HCBS Settings Statewide Transition Plan through the Address Collection Tool

• Minor changes for efficiency and ease of use
Due Date

• By December 1, 2018

• A completed Address Collection Tool **MUST** accompany your self-assessment submission

• **Incomplete self-assessments will not be accepted.**
  – Revisions need to be resubmitted by the provider by December 1, 2018.

• **Failure to submit the required 2018 Quality Management Self-Assessment by December 1, 2018 will jeopardize your agency’s Medicaid enrollment.**
The 2018 Self-Assessment


• Save to your computer by agency name

• Complete electronically

• Submit using the button on the form

• Email the completed Address Collection Tool
Section A – Agency Identification

- Section A asks for information for the main office. There is a space to list the EIN number (9 digit number) and all applicable agency NPIs (10 digit numbers). List your agency’s legal name, if different from name you are doing business as (DBA), as well as correct email addresses.
Section A – Agency Identification (continued)

• Please clarify if you have agency locations that operate under a different name.

• Example: Your main office location operates under the company name but your self-assessment also covers 3 assisted living facilities across the state that operate under different names. Those names, counties, and NPIs should be listed here.

<table>
<thead>
<tr>
<th>Agency Name</th>
<th>City</th>
<th>County</th>
<th>Associated NPI (10 digits)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tbody>
</table>
Section B – Service Enrollment

Indicate each of the programs and corresponding services your agency is enrolled to provide (regardless of whether or not these services are currently being provided). If your agency is not enrolled for any of the services in this section, you are not required to submit the annual Provider Quality Management Self-Assessment. If you are uncertain as to the services your agency is enrolled for, please contact the IME Provider Services as explained on page one.

<table>
<thead>
<tr>
<th>Program</th>
<th>AIDS/HIV Waiver</th>
<th>BI Waiver</th>
</tr>
</thead>
<tbody>
<tr>
<td>Services</td>
<td>☐ Adult Day Care</td>
<td>☐ Adult Day Care</td>
</tr>
<tr>
<td></td>
<td>☐ Agency Consumer Directed Attendant Care</td>
<td>☐ Behavior Programming</td>
</tr>
<tr>
<td></td>
<td>☐ Counseling</td>
<td>☐ Agency Consumer-Directed Attendant Care</td>
</tr>
<tr>
<td></td>
<td>☐ Respite</td>
<td>☐ Family Counseling and Training</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Interim Medical Monitoring and Treatment</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Prevocational Services</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Respite</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Supported Community Living</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Supported Employment</td>
</tr>
<tr>
<td>Program</td>
<td>CMH Waiver</td>
<td>Elderly Waiver</td>
</tr>
<tr>
<td></td>
<td>☐ Family and Community Support Services</td>
<td>☐ Adult Day Care</td>
</tr>
<tr>
<td></td>
<td>☐ In-home Family Therapy</td>
<td>☐ Agency Consumer Directed Attendant Care</td>
</tr>
<tr>
<td></td>
<td>☐ Respite</td>
<td>☐ Assisted Living Service</td>
</tr>
<tr>
<td>Service</td>
<td></td>
<td>☐ Case Management</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Mental Health Outreach</td>
</tr>
</tbody>
</table>
Section B – Service Enrollment (continued)

• Select ALL services you are enrolled for.

• You may be enrolled for additional HCBS services not listed in Section B. These services are not part of the self-assessment or HCBS quality oversight process.

• Self-Assessment responses will be based on the policies and procedures the agency utilizes for the services indicated in Section B.
Section C – State and Federal Standards

I. Fiscal Accountability
IAC Chapters 78 and 79

At a Minimum, all providers will maintain evidence of:

1. A system for setting rates based on reasonable and proper costs of service provision (for example: D-4s, fee schedules, County Rate Information System CRIS Report, Documentation to support assigned tier rate)

2. The maintenance of fiscal and clinical records for a minimum of five years

If indicating “No,” describe plan to meet the standard(s):

[Choose One]

If indicating “NA,” describe why the standard(s) are not applicable to your agency:

[Choose One]
Section C– State and Federal Standards (continued)

• You must select a response for each standard. Any self-assessments with unanswered standards or comments will be returned and considered not complete.
  – If indicating “Yes”, it means you have a policy and/or evidence in place as required. It is not necessary to explain your response.
  – If indicating “No”, you must describe a corrective action plan (CAP) to meet the standards
  – If indicating “NA”, you must describe why the standard(s) are not applicable to your facility.
Section C - III. Requirement B. HCBS settings

- 42 CFR 441-310 (c)(4) and 42 CFR 441-710

- Applies to HCBS services covered by the self-assessment.
  - Responses for respite are not required due to the nature of the service

- Respond to standards “a.” through “n.” for each service the agency is enrolled

- If a service you are enrolled for is not listed under a specific standard, you are not required to provide a response to that standard for that service.
Requirement B. HCBS settings required for all providers

At a minimum, there will be evidence of:

1. The setting is integrated in, and facilitates the member's full access to the greater community including opportunities to seek employment and work in competitive integrated settings, engage in community life, control personal resources, and receive services in the community like members without disabilities

<table>
<thead>
<tr>
<th>Service</th>
<th>NA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adult Day Care</td>
<td></td>
</tr>
<tr>
<td>Agency Consumer-Directed Attendant Care (CDAC)</td>
<td>NA</td>
</tr>
<tr>
<td>Assisted Living Service</td>
<td>NA</td>
</tr>
<tr>
<td>Behavior Programming</td>
<td>NA</td>
</tr>
<tr>
<td>Counseling</td>
<td>NA</td>
</tr>
<tr>
<td>Day Habilitation</td>
<td>NA</td>
</tr>
<tr>
<td>Family Counseling and Training</td>
<td>NA</td>
</tr>
<tr>
<td>Family and Community Support Services</td>
<td>NA</td>
</tr>
<tr>
<td>In-home Family Therapy</td>
<td>NA</td>
</tr>
<tr>
<td>Interim Medical Monitoring and Treatment (IMMT)</td>
<td>NA</td>
</tr>
<tr>
<td>Mental Health Outreach</td>
<td>NA</td>
</tr>
<tr>
<td>Prevocational Services</td>
<td>NA</td>
</tr>
<tr>
<td>Residential-Based Supported Community Living (RB-SCL)</td>
<td>NA</td>
</tr>
<tr>
<td>Supported Community Living (SCL)</td>
<td>NA</td>
</tr>
<tr>
<td>Supported Employment (SE)</td>
<td>NA</td>
</tr>
<tr>
<td>Habilitation Services</td>
<td>NA</td>
</tr>
<tr>
<td>Day Habilitation</td>
<td>NA</td>
</tr>
<tr>
<td>Home-based Habilitation</td>
<td>NA</td>
</tr>
<tr>
<td>Prevocational Habilitation</td>
<td>NA</td>
</tr>
<tr>
<td>Supported Employment Habilitation</td>
<td>NA</td>
</tr>
</tbody>
</table>

If indicating "No," describe plan to meet the standard(s):


If indicating "NA," describe why the standard(s) are not applicable to your agency:
Requirement B. HCBS settings (cont.)

• Standards 1-6 include
  – All HCBS services

• Standards 7 through 14 include services that are
  – Provider-owned, provider-controlled*
  – Most are specific to residential settings

• Standards 9, 10, 11 also apply to non-residential settings

* The definition of a provider-owned and controlled setting is included within Section C – III. Requirement B.
Requirement B. HCBS settings (cont.)

Requirement B. 7 through 14 applies to services in provider-owned or controlled settings. As indicated in the approved Statewide Transition Plan (STP), services are provider-owned or provider-controlled if the following conditions are present:

If the HCBS provider leases from a third party or owns the property, this would be considered provider-owned or controlled. If the provider does not lease or own the property, but has a direct or indirect financial relationship with the property owner, it would be presumed that the setting was provider-controlled unless the property owner or provider establishes that the nature of the relationship did not affect either the care provided or the financial conditions applicable to tenants. If the member leases directly from the third party that has no direct or indirect financial relationship with the provider, the property is not considered provider-owned or controlled.

<table>
<thead>
<tr>
<th>Requirement</th>
<th>NA</th>
</tr>
</thead>
<tbody>
<tr>
<td>7. Provider-owned or provider-controlled setting, each member has privacy in their sleeping or living unit</td>
<td>NA</td>
</tr>
<tr>
<td>Agency Consumer-Directed Attendant Care (CDAC)</td>
<td>NA</td>
</tr>
<tr>
<td>Residential-Based Supported Community Living (RB-SCL)</td>
<td>NA</td>
</tr>
<tr>
<td>Supported Community Living (SCL)</td>
<td>NA</td>
</tr>
<tr>
<td>Habilitation Services</td>
<td>NA</td>
</tr>
<tr>
<td>Home-based Habilitation</td>
<td>NA</td>
</tr>
</tbody>
</table>

If indicating “No,” describe plan to meet the standard(s):

If indicating “NA,” describe why the standard(s) are not applicable to your agency:
Requirement B. HCBS settings (cont.)

• A response of “Yes” indicates that the provider can demonstrate evidence of compliance through various agency policies or procedures
  – Evidence may include member service plans, service contracts, lease agreements, member assessments, activity calendars, service documentation

• A written policy on HCBS settings and integration is not currently required, but recommended
Section D – CMS Final Setting Rule
New for 2018

<table>
<thead>
<tr>
<th>Section D. CMS Final Setting Rule</th>
</tr>
</thead>
<tbody>
<tr>
<td>During any HCBS Quality Oversight review process has your agency been required to submit a corrective action plan related to the requirements identified in Section II. Requirement B. HCBS Settings Rule or Section II. Requirement C. Person-Centered Planning?</td>
</tr>
</tbody>
</table>

Choose One

42 CFR 441.301(o)(4) and 42 CFR 441.710(a)

If “Yes,” your agency must submit a status update to your corrective action plan to provide evidence that your agency is on track to meet compliance in this area. Include update below.
Section E – Guarantee of Accuracy

In submitting this Self-Assessment or signing this Guarantee of Accuracy, the agency and all signatories jointly and severally certify that the information and responses on this Self-Assessment are true, accurate, complete, and verifiable. Further, the agency and all signatories each acknowledge (1) familiarity with the laws and regulations governing the Iowa Medicaid program; (2) the responsibility to request technical assistance from the appropriate regional HCBS Specialist (see contact instructions on page one) in order to achieve compliance with the standards listed within this assessment; (3) the Department, or an authorized representative, may conduct desk or on-site reviews on a periodic basis, as initiated by random sampling or as a result of a complaint. **NOTICE:** Any person that submits a false statement, response, or representation, or any false, incomplete, or misleading information, may be subject to criminal, civil, or administrative liability.

Indicate which accreditation, licensure or certification held, including those which qualify your agency to provide HCBS. Include dates of accreditation/licensure/certification for each selection chosen (MM/YY begin – MM/YY end):

<table>
<thead>
<tr>
<th>Check Box</th>
<th>Accreditation, Licensure or Certification</th>
<th>Start Date</th>
<th>End Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐</td>
<td>Council on Accreditation</td>
<td></td>
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<tr>
<td>☐</td>
<td>CARF International</td>
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<td>☐</td>
<td>Iowa Department of Public Health</td>
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<tr>
<td>☐</td>
<td>The Council on Quality and Leadership (CQL)</td>
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<td>☐</td>
<td>Department of Inspections and Appeals</td>
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<td>☐</td>
<td>The Joint Commission (TJC)</td>
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<tr>
<td>☐</td>
<td>Chapter 24</td>
<td></td>
<td></td>
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<tr>
<td>☐</td>
<td>Other</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Question: Is your organization in good standing with the accreditation/licensing/certifying organization?  *If your organization received less than a three year accreditation/certification, the review results and corrective action plan must accompany the completed 2018 HCBS Provider Quality Management Self-Assessment.*

Question: Is this organization in good standing with the Iowa Secretary of State's Office?

PRINT NAME of Agency

PRINT NAME of Executive Director

SIGNATURE of Executive Director  Date

PRINT NAME of Chairperson, Board of Directors

SIGNATURE of Chairperson, Board of Directors  Date
Section E – Guarantee of Accuracy (continued)

- Accreditation/Licensing/Certification needed to provide enrolled HCBS services
  - Include start and end dates as prompted

- Signatures
  - Should be signed with a secure digital signature.
  - A help document can be found at: https://helpx.adobe.com/acrobat/using/digital-ids.html
  - Work with your HCBS specialist for additional troubleshooting.
  - Self-Assessments without signatures will be returned
Self-Assessment Submission

- Self-Assessment will again be completed electronically
  - Use “Submit” button at the end of the document

- Do not complete the form by hand, scan, print, fax, or upload through IMPA unless otherwise instructed by your HCBS specialist

- Send the REQUIRED Address Collection Tool at the same time as the self-assessment
Self-Assessment Submission (continued)

- Other supporting documentation as needed
  - Accreditation Report
  - Corrective Action Plans as needed from Section D

- Send all supporting documents with your agency name in the email subject line
Self-Assessment Submission (continued)

Agency name here
Self-Assessment Submission (continued)

An email message with "2018 SA 470-4547 distributed.pdf" attached has been sent from your default email account. If your account is not configured to send email automatically, it will be stored in the outbox folder. You will have to manually send it from your email account.

Don't show again

OK
Address Collection Tool

- Information on HCBS service setting sites will continue to be collected as indicated in the statewide transition plan to the Centers for Medicare and Medicaid Services (CMS).

- A 2018 Address Collection Tool has been sent to all providers who submitted a 2017 self assessment.

- If you are a new provider or did not receive a blank copy of the tool, please request it directly from your HCBS specialist.
Address Collection Tool

• All waiver services covered by the self assessment except Respite and Elderly Waiver Case Management.

• If you saved your address collection tool from last year, you may be able to copy the information that is still relevant and paste it into the 2018 form in the appropriate tab and columns.
  – Revise and update the data to reflect your agency’s current service settings.
  – **Do not re-send the 2017 address collection tool**
Address Collection Tool

• Submit all office locations and service provision sites for required services
  – Include member addresses if services are provided in the member home’s
  – Include office addresses for all agency office locations, regardless of whether services are provided in that location.
  – An office is defined as space is staffed by people who also provide administrative or clerical work and who are not providing direct care services.
Address Collection Tool

- The form is a Microsoft Excel file
  - Select “Enable Editing” and then “Enable Content” in the yellow bar at the top

![Address Entry Form](image-url)
Address Collection Tool

![Address Collection Tool screenshot](image)

<table>
<thead>
<tr>
<th>Field</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agency Name</td>
<td></td>
</tr>
<tr>
<td>Type of Location</td>
<td></td>
</tr>
<tr>
<td>Site Address</td>
<td></td>
</tr>
<tr>
<td>Address Number</td>
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<tr>
<td>Street</td>
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<tr>
<td>City</td>
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<tr>
<td>State</td>
<td></td>
</tr>
<tr>
<td>Zip Code</td>
<td></td>
</tr>
<tr>
<td>Unit/Apt</td>
<td></td>
</tr>
</tbody>
</table>
Address Collection Tool

![Address Collection Tool GUI](image)
Address Collection Tool

DO Include

✓ Agency office locations
✓ Member addresses for all waiver funded services covered in Section B of the self-assessment that are provided in the member’s home
  - Includes IMMT, counseling and therapy services
✓ Group Supportive Employment if provided in a workshop-type setting or an enclave.
✓ Community Based or “no walls” Day Habilitation
  - Use primary address
Address Collection Tool

**DO NOT Include**

- Office locations in member homes that are simply used to store and maintain agency paperwork and supplies.
- Community locations that the member and staff travel to during service delivery.
- Community businesses where individual SE is provided.
- Respite services.
- Elderly Waiver Case Management member addresses.
- Elderly Waiver Mental Health Outreach member addresses.
Determining Provider-Owned/Controlled

• Provider-owned or controlled:
  – HCBS provider leases from a third party or owns the property
  – Provider does not lease or own the property, but has a direct or indirect financial relationship with the property owner unless the property owner or provider establishes that the nature of the relationship did not affect either the care provided or the financial conditions applicable to tenants.

• Not provider-owned or controlled:
  – Member leases directly from a third party that has no direct or indirect financial relationship with the provider
Submission of Address Collection Tool

• Email the tool to hcbsqi@dhs.state.ia.us
  – Include agency name in the subject line

• Information on service sites and addresses should be submitted via the approved form only

• Submission of the self-assessment will not be considered complete until the Address Collection Tool is also received
  – It is strongly recommended to submit both at the same time
Timeliness

• Due by December 1, 2018

• Implementation of corrective action to address current CFR, Iowa Code, and IAC standards must be completed within 30 days of the date in Section E.

• Failure to submit the required 2018 Quality Management Self-Assessment will jeopardize your agency’s Medicaid enrollment.
What to expect following submission

• Providers will receive written letter of acceptance by IME

• Incomplete submission
  – If areas of the self-assessment are incomplete or corrective action was not identified, the provider will be notified and the self-assessment must be resubmitted
  – The December 1, 2018 due date still remains
HCBS Support

• Self-Assessment Website
  – Frequently Asked Questions (FAQs)
  – Self-Assessment Training Slides
  – Link to regional specialist map
  – Archived Self-Assessment resources

• Archived Informational Letters
  http://dhs.iowa.gov/ime/providers/rulesandpolicies/bulletins

• Informational Letter sign-up
  https://secureapp.dhs.state.ia.us/impa
Additional Resources

• Centers For Medicare and Medicaid Services
  http://www.cms.gov/

• Iowa Code and Iowa Administrative Code (IAC):
  http://search.legis.state.ia.us/nxt/gateway.dll/ic?f=templates&fn=default.htm

• Provider Services: http://dhs.iowa.gov/ime/providers
  − imeproviderservices@dhs.state.ia.us
  − 1-800-338-7909 (toll free) or 515-256-4609 (Des Moines) Select Option 4
Additional Resources

• The HCBS Settings Toolkit
  – released by the Centers for Medicare and Medicaid services (CMS)
  – contains Exploratory Questions designed for Non-Residential HCBS sites.
  – can be used to evaluate your services to identify the presence or absence of each indicator.
  – questions are linked on Iowa’s HCBS Setting Transition webpage:
    http://dhs.iowa.gov/ime/about/initiatives/HCBS
Send questions to:

hcbsqi@dhs.state.ia.us
Subject: 2018 Self-Assessment