Survey Redesign and Provider Performance

Presentation by the Division of Quality Improvement at the Cerebral Palsy Association of NYS and NYSARC Quality and Compliance Conference May 2, 2017
Survey Redesign Goals and Benefits

• Enhance efficiency and consistency of review activities
• Improve collection of findings and identification of trends
• Make the survey process clear and transparent for providers and individuals/families
• Build from AQP to provide mechanism for transparency of findings and agency performance
• Facilitate provider quality improvement activities
• Develop sustainable processes as OPWDD transitions to new service delivery models
## 3 Review Types and Protocols

<table>
<thead>
<tr>
<th>Protocol</th>
<th>Start Date</th>
<th>Purpose of Activity</th>
<th>Scope of Activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site Review</td>
<td>October 2016</td>
<td>Health, safety, well-being and HCBS compliance</td>
<td>≈ 7,300 non-ICF sites:</td>
</tr>
<tr>
<td>Person-Centered Review</td>
<td>Summer 2017</td>
<td>Individual’s needs, goals and outcomes are met through comprehensive service planning and delivery</td>
<td>2016-17&lt;br&gt;• 400 DOH ISP&lt;br&gt;• + ≈2000 WB Individuals <em>(Partial PCR)</em>&lt;br&gt;&lt;br&gt;2017-18&lt;br&gt;• 400 DOH ISP&lt;br&gt;• 1100 Statewide&lt;br&gt; 1500 Individuals - Full PCR&lt;br&gt;+ ≈ 250 Individuals in HS Sites <em>(Partial PCR)</em>&lt;br&gt;+ ≈1500 WB Individuals in IRAs <em>(Partial PCR)</em></td>
</tr>
<tr>
<td>Agency Review</td>
<td>Fall 2018</td>
<td>Verify effective systems and quality oversight</td>
<td>700+ agencies</td>
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Site Review Protocol Sections

- Heightened Scrutiny Triggers
- Health Support and Medication
- Personal Funds
- General Operations for: Individualized Choice, Autonomy and Satisfaction
- Delivery of Safeguards, Services and Supports
- Rights and Protections
- Site and Safety
- Fire Safety
- Site Specific Requirements
- Special Risk Factors
Person Centered Review

• Designed to enable review of any and all services a person receives from all provider agencies providing their services

• Review applicable no matter how or where individual receives services/supports

• Implemented for a provided sample

• Includes service and site specific requirements related to:
  - Person Centered service planning
  - Person Centered service delivery (service/care coordination, waiver service, service specific plans/interventions)
  - Safeguards to minimize risks
    • Rights, health care, safeguards, behavioral supports, protections
  - HCBS requirements if person supported in certified site
  - Quality of life
Agency Review

Centralized typically annual review of:

• Regulatory and quality expectations designed, implemented and managed at the agency level

• Sample verification of compliance for selected regulatory requirements:
  – Hiring
  – Training
  – Personal Allowance
  – Incident Management

• Agency practices and strategies that influence quality outcomes:
  – Workforce
  – Quality Improvement Planning and Strategies
  – Community Connections
  – Agency Management
Quality Domains and the standards that represent quality in six (6) domains. The complete matrix is available on OPWDD’s website.
## DQI: Develop Survey Protocols Based on Quality Standards

<table>
<thead>
<tr>
<th>DQI Protocols Aligned with Quality Performance Domains/Criteria</th>
<th>Provider Systems Review</th>
<th>Person Centered Review</th>
<th>Site Reviews</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>• QI Plan, Organizational Level Effective Systems in place (e.g., training, incident management, workforce competencies, person centered planning practices, etc.)</td>
<td>• Individual needs, goals, and outcomes • How well the organization support the individual's needs, goals and outcomes • Sample will also be used to test agency systems and site based supports</td>
<td>• Physical Plant Related Elements/Fire Safety, HCBS settings Characteristics, Medication Admin, supports at site, etc.</td>
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</table>
Agency Quality Performance – Additional Activities

- Incorporate domains into all the DQI survey protocols
- Finalize protocol sampling strategy
- Operationalize DD Care Coordination for managed care
- Finalize quality rating levels
- Research national and state-specific approaches to provider performance
  - This includes CMS 5-star ratings for NHs and Hospitals
  - Aim is to apply a tested and accepted approach and adapt to OPWDD system of providers
- Develop rating mechanism based on data collected through survey protocols
- Develop IT solution to aggregate data
- Develop provider performance reports and dashboards
Agency Quality Performance – Feedback Loop

- Allows development of clear, transparent and easy to understand rating/scoring system
- Sets clear statewide benchmarks for performance
- Obtains provider feedback early in development process
- Allows sufficient time for IT or Protocol changes
- Allows opportunity to identify implementation milestones
<table>
<thead>
<tr>
<th>Activity</th>
<th>Timeframe</th>
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<tbody>
<tr>
<td>Protocol Implementation and Dashboard Design</td>
<td>October 2016 to March 2018</td>
</tr>
<tr>
<td>Provider Performance Methodology and Ratings</td>
<td></td>
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<tr>
<td>Refinement of Methodology</td>
<td>March to September 2018</td>
</tr>
<tr>
<td>Data Collection</td>
<td></td>
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<tr>
<td>Data Validation and Website Design</td>
<td>October to November 2018</td>
</tr>
<tr>
<td>Publication Ratings on OPWDD Website</td>
<td>December 2018</td>
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</table>
Agency Quality Performance – Proposed Framework

- There are anticipated to be two components of a provider rating:
  - **Quality Standards** (Agency Quality Performance Domains) – Standards relating to the quality domains factor into the performance rating but not into enforcement actions (i.e., citation of deficiencies and issuance of ECFs, SODs, etc.)
  - **Regulatory Standards** (Survey Inspections) – There are based on Mental Hygiene Law and other federal/state regulatory requirements and determine whether minimum compliance is met
Agency Quality Performance – Scoring and Weighting (Example)

- The rating considers the number and the scope and severity of deficiencies
  - By agency capacity and number of programs
  - By number and severity of deficiencies/enforcement action
  - More serious, wide spread deficiencies will have a greater impact on rating/scoring
  - Less serious, isolated deficiencies have less of an impact rating/scoring
Agency Quality Performance – Weighting of Deficiencies

• Rating system will utilize weighting of deficiencies on the basis of scope and severity

• Effective rating system requires standardized approach to issuing enforcement actions

• Similar to current ratings, providers will be deemed to:
  - Exceed standards (4-5 stars) = Above Average Quality
  - Meet standards (3 stars) = Average Quality
  - Below Standards (1-2 stars) = Below Average Quality
Agency Quality Performance – Other Considerations

- What scoring information will be publically available?
- What is the survey period for which scores will be based?
  - Likely prior survey cycle to current cycle
- How will scoring be used to provide resources to stakeholders?
- How will low-performing agencies be addressed?
  - Approaches to incentivize performance
  - Technical Assistance
  - Early Alert/Enhanced Monitoring
- How will staffing and complaints be factored?
Agency Quality Performance – Next Steps

- Standardize enforcement actions and surveyor training
- Weighting system to be developed
- Rating methodology to be developed
- Testing of Approach
Questions?

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