

# State of Connecticut Department of Developmental Services



Ned Lamont Governor Jordan A. Scheff Commissioner

Elisa F. Velardo Deputy Commissioner

**To:** DDS Qualified Private Providers (Purchase of Service Contract holders)

From: Quality Service Review Division

CC: Jordan Scheff, Commissioner, Elisa Velardo, Deputy Commissioner, Katie Rock-Burns, Chief of Staff, Scott McWilliams, Chief of Fiscal/Administrative Services, Jackson Pierre-Louis, Quality and Systems Improvement Director, Regional Directors, Private ARDs, Resource Administrators, Krista Ostaszewski, Health Management Administrator, Holly Thomen, Quality Review Supervisor

**Date:** 1/17/2023

RE: Update Regarding Quality Service Reviews (QSR) Unit & Associated QSR Processes

This memo is to alert all DDS POS contracted private providers of some updates to the Quality Service Review (QSR) Unit and corresponding revisions to QSR specific processes. As participation in the QSR process and service evaluations, in accordance with QSR, is articulated in the DDS POS contract, it is important that you, as a POS contracted provider, are aware of any changes.

# **QSR Unit Transition**

Recently, the QSR unit moved to the Medicaid Operations division to focus more closely on reviewing the quality of supports and services provided to the individuals served through DDS.

The QSR unit continues to make improvements with our quality monitoring process and look forward to building strong partnerships with all DDS providers to ensure providers receive the tools, resources and materials needed to deliver the highest quality of services to the individuals we support, while allowing for the continued success in the delivery of such services.

Please make sure to visit the new QSR webpage on the DDS website. This page will provide information on QSR contacts, the QSR system user manual, and resources on QSR indicators and the associated interpretive guidelines. The new QSR webpage can be located here: Quality Service Review Unit (ct.gov)

#### **Corrective Action Plan (CAP) Process**

The QSR unit has revised the CAP process in response to findings identified during a Quality Service Review. Reviews are conducted across the DDS service delivery system for all services funded by DDS. A review may be specific to a DDS individual or a qualified private provider. The intent of a review is to ensure quality services are being provided and health and safety standards are being met and maintained. The CAP process is the formalized course in which identified deficiencies are addressed and resolved by qualified providers.

Prior to this memo, all CAPs were to be addressed by the corresponding provider within two weeks of receiving such plan. Effective as of February 1, 2023:

- For indicators that are <u>specific to health and safety, the associated CAP must be addressed within 2 weeks</u> beginning when the CAP was created by the QSR system.
- For all other CAPs, the CAP must be addressed within 4 weeks beginning when the CAP was created by the QSR system.
  - o The interpretive guidelines of each indicator have been updated to note if the expectation for response is 2 or 4 weeks. A copy of all indicators and the interpretive guidelines can be found on the new QSR webpage: Quality Service Review Unit (ct.gov)
  - O Please note that the Consumer Interview and Support Person Interview sections of the QSR indicators do not have CAP timelines associated. This is because when an indicator in these sections is determined to be "not-met" the QSR staff person will work through a process for correction and an associated timeline with the provider on a case-by-case basis.
- At the 2- or 4-week mark, respectively, the reviewer will determine if the provider has acknowledged and made a good faith effort to address the CAPs in a timely manner.
  - o If this can be determined, QSR will work with the provider to address the CAPs appropriately.
- If the CAP continues to go unresolved and a good faith effort cannot be determined, the QSR staff will work with region and licensing, as applicable, to determine the appropriate next steps.
  - Next steps <u>may</u> include a meeting with the provider to discuss and come up with an agreed upon plan to address the outstanding, unaddressed CAPs. Depending on the severity of the CAP, a referral for enhanced monitoring may also be made.

## Final Settings Rule & Ongoing Monitoring

As discussed in different forums, DDS continues to work through compliance with the CMS Final Settings Rule. As a reminder, the rule requires states to review and evaluate Home and Community Based (HCBS) settings, including residential and non-residential settings, to determine that such Medicaid funded settings allow for and facilitate community-based integration that distinguish them from institutional settings.

The goal of the settings rule is to ensure settings in which HCBS participants receive services are integrated in and support full access to the greater community while also facilitating choice in services as well as choice in life decisions.

QSR will be utilized as one of the main tools to measure ongoing compliance with the CMS Final Settings Rule. As you may have noticed, the QSR indicators used to monitor the quality of supports provided already align with the settings rule. Using these indicators as the method to monitor compliance was determined to be the most appropriate tool to measure compliance while also being the least disruptive to providers. Indicators that specifically measure compliance with the settings rule have been noted in the interpretive guidelines, which can be found on the new QSR webpage here: <a href="Quality Service Review Unit (ct.gov">Quality Service Review Unit (ct.gov)</a>. It is important to note that no new indicators have been added the QSR review. More information regarding the Final Settings Rule will be shared shortly.

### **QSR Visits for Community Living Arrangements (CLAs)**

Beginning in April, QSR staff will be conducting all QSR reviews for CLAs pulled as part of the annual sample (approximately 40 CLAs in total for the upcoming waiver year) on the off year of the licensing visit.

DDS and the QSR Unit is looking forward to building a strong partnership with all DDS providers to ensure the highest quality of supports and services are being provided to individuals who are DDS eligible.

Please do not hesitate to reach out to the DDS QSR Supervisor Holly Thomen, <a href="holly.thomen@ct.gov">holly.thomen@ct.gov</a> for any questions regarding this process or any questions related to QSR moving forward.

Thank you.