

Suggestions for Using the HCBS Settings Assessment Reports in Agency Quality Improvement Activities

Summary Quality Improvement (QI) Information:

Providers should use the agency aggregated results and the results for each particular site as baseline data, along with their own internal assessment findings in quality improvement efforts towards reaching full compliance with the HCBS settings rules no later than **October 1, 2018**.

As a general guideline, **it may be helpful to prioritize quality improvement activities over the next three years** to address any standards under an 85% threshold. CMS references an 85% threshold in its March 12, 2014 Quality Communication Memo regarding quality measures and reporting for Home and Community Based (1915 c waivers) for when a quality improvement project/remediation is required.

Using the Agency Aggregation Reports:

- Compare your agency aggregated results to the statewide aggregated averages to see how your agency compares on average to the rest of the state for each standard.
- Identify areas of strengths and weakness for your agency through identifying the standards that yielded the lowest percentages and the standards that yielded the highest percentages.
- Group similar standards and domains together as you think about quality improvement activities and projects. For example, the standards across both Part I and Part II that are related to community inclusion and interaction can likely be worked on through one overarching quality improvement project.
- Ensure communication of the information with all staff that can have an impact on quality improvements. It is also best practice to share quality data with people supported and other stakeholders to obtain their perspectives and ideas for improvement.

Suggestions for Formulating Quality Improvement Projects Based on Your Data:

Rather than tackle all of this information all at once, it may be helpful for your agency to look at this information in terms of quality improvement projects to tackle.

The basic philosophy behind a quality improvement project is:

- An opportunity for Learning;
- **Collaborative not punitive approach:** QI projects involve many stakeholders whose experience and expertise is essential to understanding the full scope of the problem and the possible strategies to improve. The QI project is not an exercise in finding fault, it is a way to learn and improve systems.
- **Time limited:** The duration of a QI project is time limited—usually a year although complex QI projects may involve a longer duration. Within the scope of a QI project, baseline data is collected, an intervention designed and implemented and re-measurement occurs.

Based on the topic of your QI project, you may find it helpful to establish a small QI Project workgroup whose focus is to provide input and advice on the design and implementation of the QI project. Quality improvement projects can focus on many activities including communication and training; increased adherence to requirements through creation of simple tools; development and use of practice guidelines; etc. Typically a QI Project Work Plan is developed for the overall project that identifies actions and tasks to be accomplished; responsible parties; communication with all involved; problem solving mechanisms; etc.

Examples of a QI Project based upon Fictional Agency Data:

If an agency scores 60% regarding whether people have access to food at any time, quality improvement activities could be implemented on several levels:

1. Consider creating a policy and procedure that systemically creates the expectation that each site will implement this requirement for every individual. The policy and procedure should also address the process in place for any individual who has this right restricted and would require a rights modification with informed consent.
2. The agency should ensure that all staff (current and future) are trained on this policy and procedure and are clear on agency expectations.

- 3. This requirement should then be incorporated into agency self-survey tools and activities; as well as education and self-advocacy activities for individuals receiving supports.**
- 4. At a designated future date, the agency should follow-up and validate via the self-survey process whether individuals truly do have access to food at any time.**
- 5. Incorporate these action steps into an overall quality improvement/compliance plan that tracks major milestones in successful implementation of this requirement, using self-survey findings and data.**

General Focus areas for QI Projects could include projects such as:

Agency training materials should reflect the areas where your agency scored below 85%. Discuss the results with direct support professionals, people supported, and other relevant stakeholders across the agency and brainstorm ways to improve the percentages in each area. Formulate quality improvement projects that will have a high probability of success in terms of improving outcomes in each setting and systemically across the agency.