

Background:

On April 30, 2014, OPWDD posted for public comment two draft documents which were the initial results of the efforts of the Agency Quality Performance Stakeholder Work Group (AQPR) whose charge is to:

- Make recommendations for clear system wide expectations for quality supports and services that go beyond regulatory compliance;
- Determine the quality standards and/or indicators that will be used to assess agency performance and determine the distinguishing characteristics of each level; and,
- Make short and long term recommendations for the integration of the quality standards and agency performance assessments into OPWDD's review protocols and business processes.

The two draft documents posted are the Phase I deliverables of the workgroup. They identify the quality domains and standards that will be the basis for assessing agency performance in the delivery of supports and services. These documents were posted on the OPWDD website as: [Part I: High Level Summary of Domains](#) and [Part II: Domains with a set of standards and expectations for each](#).

During the official period of public comment, OPWDD received transmissions from 21 stakeholders and/or stakeholder groups that reflected respondents' concerns, issues, questions and advice.

High Level Summary of Respondents' Feedback:

Specific feedback to the domains and standards varies widely and includes:

- Requests for clarification of standards and definitions of terminology (e.g. clarify what is meant by the statement "agency's role in supporting staff and persons supported in the development of social networks"; define "dignity of risk", "informed choice", "organizational learning/knowledge management")
- Suggestions for rewording and the addition or deletion of specific standards (e.g. revise standard for staff performance evaluations to include participation of individuals receiving supports; add a standard to assess that individuals' culture, race, ethnicity, linguistic competency and health literacy are evaluated and considered in supports and services planning and delivery; and delete a standard which evaluates an agency's quality improvement plan based on its alignment with OPWDD transformation goals)
- Questions regarding how the standards will be measured and how the standards will be reviewed by OPWDD (e.g. how will OPWDD measure if individuals are realizing personal goals while these goals continue to evolve; and if OPWDD will provide templates for quality improvement plans or the criteria OPWDD will use to assess agency quality improvement plans)
- The following describes the topic areas for which more information and/or modification is requested and/or suggested:
 - Dignity of Risk (e.g. A suggestion to "keep [it] as part of the entire protocol [since] Individuals will be encouraged and allowed to make their own decisions.")
 - Informed Choice (e.g. consider how to assess if staff are adequately trained to better offer and discern informed choices of persons who don't use language.)
 - Self Advocacy (e.g. Need to respect that not all persons wish to be involved in formal self advocacy activities and evaluate accordingly.)
 - Natural supports versus paid supports (e.g. Evaluate that natural supports are being maximized as opposed to evaluating if paid supports are replaceable.)

- Cultural Diversity (e.g. Incorporate diversity into the domains and standards at all applicable opportunities.)
- Expectations of Person Centered Planning (e.g. Ensure control is in the hands of the Person supported; ensure provision of unbiased person centered planning; clarify how to apply to persons who don't use language; uncertainty how to measure the dynamic process of person centered planning and goal setting, etc.)
- Community integration and connection on both Person and agency levels (e.g. Focus on Individuals' satisfaction with their community and relationship goals as opposed to assessing an agency's role in the community.)
- Expectations for supports of health care and personal funds (e.g. Consider how allowing and supporting 'dignity of risk' impacts traditional expectations for how support is provided)
- Communication between Persons supported and agency governance (i.e. formalize the expectation of an agency mechanism for board representation and/or input by persons supported)
- Review of the role of habilitation in person centered planning (e.g. consideration whether supports to attain life choices and goals fit traditional habilitation activities)
- Add or clarify expectations regarding Workforce: staff training in the topic areas above; the role of persons supported in staff hiring and evaluation processes; and staff retention efforts.

General Feedback:

In addition to specific feedback on the domains and standards, we received general feedback about the creation of system wide expectations for quality supports and services that go beyond regulatory compliance.

General feedback about the implementation and oversight of a quality framework for the delivery of supports and services include:

- This initiative may be redundant for agencies which already have either an internally developed quality framework and evaluation process or who are certified or accredited by an external non-governmental oversight body. The concern is that such redundancy would create a resource drain and therefore be inefficient. The respondents' suggested solution would be for OPWDD to review Providers' quality improvement plans and their implementation while using the AQPR quality matrix as a model of best practices.
- The review of agency's quality improvement plans may potentially penalize agencies for not achieving agency generated goals which are believed to be above and beyond what OPWDD expects.
- There may be added costs to provider agencies to meet the expectations of the framework which, if not offset by additional government funding would create a greater strain on an already financially stressed voluntary provider sector.
- The domains and standards do not adequately address the provision and delivery of culturally and linguistically appropriate services.
- The language of the framework is not sufficiently 'person first' (outcome oriented) versus 'process first' (compliance oriented) and doesn't lend itself well to evaluate supports and services delivered in non-certified settings.
- The current draft framework doesn't fully integrate the requirements of the Center for Medicare and Medicaid Services (CMS) Home and Community Based Services (HCBS) regulations, especially in the areas of Person Centered Planning (PCP), personal choice and most integrated setting.
- It is unclear how this framework will apply in the future managed care environment.
- A focus group of persons supported by a provider agency advocates that the standards and domains should first value, and reflect most, that which is important and practical to persons receiving supports; and that the standards be kept as simple and accessible as possible to all stakeholders.

OPWDD appreciates all of the feedback it has received on this initial, draft, high level summary of domains and standards of quality for our service system. All respondents' input will be carefully considered as we move forward. The workgroup's charge to develop quality standards and criteria that represent the values and priorities of people receiving services, their advocates and guardians, and OPWDD and its provider agencies will require continued collaboration with all stakeholders during this important multi-year initiative.

Next Steps for the AQP Work Group:

The AQP work group will reconvene in November 2014 to consider the input and feedback received from all respondents. This feedback and the finalized Home and Community Based Settings final federal regulations will be accounted for as we finalize the standards. The work group will then be working with OPWDD on integrating these quality standards into OPWDD's review protocols and processes.