

Willowbrook Service Coordination/Case Management Transition

UPDATED NOVEMBER 17, 2011

Discussion Items for Today

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- 1. BACKGROUND ON THE WILLOWBROOK CASE**
- 2. REVIEW RECENT CHANGES IN MSC/WSC/WCS TO SUPPORT THE TRANSITION OF WILLOWBROOK CASE MANAGEMENT**
- 3. REVIEW THE REQUIREMENTS FOR WILLOWBROOK CASE MANAGEMENT/SERVICE COORDINATION**
- 4. EXPLANATION OF WCS AND OVERVIEW OF EXPECTATIONS FOR MSC/WSC/WCS**
- 5. BILLING FOR WCS AND CASE MANAGEMENT SERVICES FOR CLASS MEMBERS LIVING IN NURSING HOMES OR OTHERWISE NOT ELIGIBLE FOR MSC**
- 6. DDSO MONITORING WILLOWBROOK MSC/WSC/WCS**

Willowbrook
opened
October 1947



**Great expectations,
few promises kept**

Willowbrook



**A BIG campus with TOO many people
A service centered facility that
isolated people from community life**

Willowbrook



Same shoes, same services for all!

Willowbrook Important Dates!!

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- **March 17, 1972**
 - Class-action lawsuit filed against NYS in federal court
- **May 5, 1975**
 - Willowbrook Consent Decree became effective
- **February 25, 1987**
 - Federal Court approves Willowbrook "1987 Stipulation" that sets forth guidelines for class member community placement
- **September 17, 1987 ~ A promise fulfilled ~**
 - Willowbrook Developmental Center "officially and forever closed"
- **March 11, 1993 ~**
 - Willowbrook Permanent Injunction replaces Willowbrook Consent Decree and all other prior orders in the Willowbrook litigation

What Makes Someone A Willowbrook Class Member?

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- An individual is not a class member simply having lived at Willowbrook State School
- Membership includes:
 - All 5,343 individuals on the rolls of Willowbrook State School at the time the summons and complaint was filed (March 17, 1972)
 - Additionally, by court order, 104 individuals who were on community status on March 17, 1972 and documentation confirms that they returned to Willowbrook or another related facility



Willowbrook Attorneys

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- New York Civil Liberties Union (NYCLU):
 - Beth Haroules and Lisa Laplace, lead Willowbrook attorneys for allegations of abuse/neglect AND guardianship petitions
- New York Lawyers for the Public Interest (NYLPI)
 - Roberta Mueller, lead Willowbrook attorney for death notices AND due process notification

Consumer Advisory Board (CAB)

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- CAB is a 7 member board of parents, siblings and advocates established in 1975 with a dual role:
 - ✓ “in loco parentis” ~ full representation, co-representation or no representation
 - ✓ systemic monitoring to ensure class member rights are protected, including review of ALL incident reports and Special Incident Review Meeting minutes to ensure the rights of all class members
- The board is chaired by Ann Nehrbauer, who works with Executive Director Antonia Ferguson, 3 Assistant Directors and CAB local representatives who represent the Board and Ms. Ferguson throughout the State

OPWDD Contacts

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- Patrick MacRae, OPWDD Office of Counsel
 - ✓ 44 Holland Avenue, Albany, NY 12229; (518) 474-7700
- Helene DeSanto, Deputy Commissioner, Service Delivery and Integrative Solutions
 - ✓ Administrative Liaison to the Willowbrook Parties; 44 Holland Avenue, 4th Floor, Albany, NY 12229; (518) 474-9897
- Lori Lehmkuhl, OPWDD Willowbrook Liaison
 - ✓ Statewide responsibilities related to Willowbrook class members; 44 Holland Avenue, Albany, NY 12229; (518) 473-6026
- DDSO Willowbrook Liaisons
 - ✓ Each district has its own liaison addressing Willowbrook matters

Agency Administrative Willowbrook Liaison

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**EFFECTIVE IMMEDIATELY,
OPWDD IS LOOKING FOR VOLUNTARY
AGENCIES PROVIDING WILLOWBROOK CASE
SERVICES TO HAVE A DESIGNATED AGENCY
ADMINISTRATIVE WILLOWBROOK LIAISON,
WHO WILL BE THE PRIMARY CONTACT WITH
THE DDSO WILLOWBROOK LIAISON ON
WILLOWBROOK ISSUES**

**RECENT CHANGES THAT
SUPPORT VOLUNTARY AGENCY
IMPLEMENTATION OF
WILLOWBROOK CM/SC**

Willowbrook Individuals Receiving Case Management

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Service	# of Individuals *
Receiving State Medicaid Service Coordination	1,280
Receiving State Case Management (SOICF/VOICF)	826
Receiving Voluntary Medicaid Service Coordination	816
Grand Total	2,922

** From the Willowbrook Caseload Report (4/11)*

- During the 2010 MSC Redesign, OPWDD heard concerns regarding the inequity of compensation for MSC services delivered to Willowbrook class members vs. non-class individuals
- In addition, there was noted to be no way for voluntary agencies to provide case services to class members if not included in MSC
- DDSOs have had difficulty in ensuring consistency within voluntary agencies when providing case services to class members

OPWDD Response to Concerns

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- Increased **reimbursement** for Willowbrook class members receiving MSC
- **Regulatory changes** to support **Willowbrook Case Services (WCS)** for class members living in ICF programs
- Application of the increased Willowbrook MSC rate for class members receiving case management when the class member is not eligible for MSC

Willowbrook Reimbursement

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- **\$474.34 – Willowbrook MSC**
 - *this enhanced Willowbrook MSC rate supports class members receiving MSC and results in a comparable annual revenue that an MSC without class members on caseload can generate*
- **\$474.34 – Willowbrook SC (WSC)**
 - *this enhanced Willowbrook WSC rate also supports case management to class members living in nursing homes or who otherwise are not eligible for MSC*
- **\$237.17 – Willowbrook Case Services (WCS)**
 - *this rate is equivalent to one-half the enhanced Willowbrook MSC rate*

Regulatory / Other Changes

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- State Plan Amendment effective 9/1/11
- An Emergency Regulation effective 9/1/11
- Documentation standards for Willowbrook Case Services (WCS)

Willowbrook Case Services (WCS)

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- Traditionally, in an ICF/DD setting, QMRPs deliver case management services to the individuals residing there.
- For class members, DDSO case managers have provided additional court ordered services required per the Willowbrook Permanent Injunction, Appendix I, which defines case services for class members.
- By promulgating emergency regulations, OPWDD is increasing the ICF/DD rate in order to provide a mechanism to sufficiently compensate the ICF/DD for payments to service coordination providers that will be providing these additional court-ordered services.

Willowbrook Service Coordination (WSC)

- Reimbursement equal to Willowbrook MSC for class members living in nursing homes or who otherwise are not eligible for MSC
 - *WSC does not include class members living in ICFs and receiving WCS*
- Agencies must confirm with DDSOs those class members receiving WSC who reside in nursing homes so that steps are taken to bypass the payment edit that denies state paid service coordination if an individual has Medicaid
- Similarly, agencies must confirm with the DDSO any other class member served not eligible for MSC and receiving WSC

**REQUIREMENTS
WILLOWBROOK
CASE MANAGEMENT/SERVICE COORDINATION**

Overview of Obligations for Willowbrook CM/SC

- OPWDD is legally bound to comply with requirements outlined in the Willowbrook Permanent Injunction (PI) issued March 11, 1993.
- The Permanent Injunction guarantees class members certain rights and sets standards for care, including case management services.
- The obligations for case management are detailed in **Paragraph 8** and **Appendix I** of the Permanent Injunction as well as subsequent orders of the court.

Willowbrook CM/SC Standards for Compliance



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GUIDING PRINCIPLES

- OPWDD and providers must comply with applicable state and federal regulations, OPWDD policies and procedures and the Willowbrook Permanent Injunction
 - *Protection from harm*
 - *High quality and appropriate services*
 - *Community based, integrated services*

From a Willowbrook
perspective...



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**... CASE MANAGEMENT/SERVICE
COORDINATION IS CRITICAL TO
SUCCESSFUL IMPLEMENTATION OF THE
WILLOWBROOK ENTITLEMENTS FOR
SERVICES FOR CLASS MEMBERS**

The Willowbrook entitlements for case management services apply regardless of payment as MSC, WSC, WCS, etc.

Requirements for CM/SC Assignment



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**CASELOAD: NO GREATER THAN 1:20 RATIO
EQUIVALENT**

**EXPERIENCE: MUST BE A QMRP
(QUALIFIED MENTAL RETARDATION
PROFESSIONAL)**

- ✓ QMRP standards defined in 14 NYCRR 690.99 AC.

FUNCTIONAL INDEPENDENCE:

- ✓ Service coordination must be “arms length” from program operations within the voluntary agency
- ✓ CM to class members in ICFs must not be provided by the voluntary residential provider

Expectations MSC, WSC & WCS:

Case load Calculation

- When even one class member is served on caseload, caseload compliance with the 20 work units is determined using the approved court ordered work standards:
 - .5 when a class member resides in VOICF and served by a DDSO or voluntary WCS Coordinator
 - .5 when a class member resides in an SOICF and served by a voluntary WCS Coordinator
 - 1 when a class member resides in an SOICF and served by a state WCS Coordinator
 - 1 for individuals in any other living arrangement
 - 1 for individuals receiving PCSS

**No other work standards apply
when calculating Willowbrook
caseload compliance**

Caseload Reporting Form

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MSC/WSC/WCS

- Name of MSC/WSC/WCS:
- Auspice (specify provider)
- _____ Confirmation of QMRP status (Yes/No);
- _____ full time equivalent (FTE);
- _____ time spent providing services (CM FTE);
- _____ if CM FTE is less than FTE, please specify non-case assignments
- _____ total caseload;
- _____ total class members on caseload;
- _____ number of individuals on caseload

Caseload Statistics

- Specify by type of residential program:
Class Member
___ VOICF ___ SOICF ___ VOICR ___ SOICR ___ FC
___ VOIRA ___ SOIRA ___ Other Residential Setting
Nonclass individuals
___ VOICF ___ SOICF ___ VOICR ___ SOICR ___ FC
___ VOIRA ___ SOIRA ___ Other Residential Setting
- List class members on caseload (NOT required if TABS accurately reflects MSC/WSC/WCS)
- ___ Total work units for each case manager
- **Caseload work units may never exceed the 1:20 standard; there must be immediate contact with the DDSO Willowbrook liaison on any compliance issue.**

Expectations for MSC, WSC & WCS:

Face to Face Contact

- **Face-to-face contacts** must be made monthly at either the residence or day services location...
 - ✓ There is discretion as to the location of the face-to-face contact but a class member must be seen at both locations over the course of each quarterly period
 - ✓ There is no exception to the monthly face-to-face requirement for class members
 - ✓ No monthly billing without face-to-face contact

Expectations for MSC, WSC & WCS:

Case Manager Monthly Documentation

- MSC/WSC/WCS keep a list of dates of monthly contact and dates of attendance at team meetings, which shall be available to plaintiffs and CAB upon request.
- MSC/WSC/WCS prepare case notes that conform to:
 - For WCS/WSC, use *WCS/WSC10b, Case Note for Class Members Living In ICF/DDs, Placed in Nursing Homes or Otherwise Ineligible for MSC services*
 - For MSC, use *MSC10b, Medicaid Service Coordination Notes*

Expectations MSC, WSC & WCS:

Caseload Reporting Protocol

Each DDSO Willowbrook Liaison/Designee:

- **Receives caseload reports from agency Willowbrook liaison**
- **Reviews caseload information/QMRP status to ensure compliance**
- **Reports caseloads to OPWDD**
- **Compares information with TABS for consistency and updates TABS as needed**
- **For noncompliant ratios/QMRP status, ensures plan of compliance with time frames for implementation**
- **For vendor change, ensures that class members/advocates receive information about available options so that an informed and reasonable choice can be made**

Expectations MSC, WSC & WCS:

Training

- MSC/WSC/WCS adhere to all training obligations for MSCs serving at least one class member on caseload
- Willowbrook training obligations include attendance at the OPWDD-approved core service coordination training within 6 months of assuming case management responsibilities; attendance at 15 hours of professional development during every training year; as well as training and understanding of incident management requirements outlined in Part 624.

Expectations MSC, WSC & WCS:

Experience/ Affiliation

- The MSC/WSC/WCS must be a Qualified Mental Retardation Professional (QMRP) that does not provide residential or day services to the class member.
 - *For WCS, an exception may be made if the class member or their advocate selects a WCS Coordinator from an agency that provides the class member day services. At this time, NO exception will be made for selection of the ICF provider.*

What Is A QMRP?

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- Qualified Mental Retardation Professional (QMRP) standards are defined within regulation 14 NYCRR 690.99 AC.
- Information regarding the qualifications for a QMRP can be found in ADM#2009-05 on the OPWDD website at <http://www.opwdd.ny.gov/wt/memoranda/index.jsp>
- It is not sufficient that staff are supervised by a QMRP. Each case manager/service coordinator serving even one class member must comply with the QMRP standard.



Expectations MSC, WSC & WCS:

Service Coordination Observation Report (SCOR)

- Required for Willowbrook class members
 - ✓ *receiving MSC/WCS and live in OPWDD certified residences, including family care, IRAs, SOICFs, CRs*
 - ✓ *who live in ICFs (completed by the WCS Coordinator, not the residential QMRP)*
- Minimally required one time in a six month period, i.e., two times a year
 - ✓ *also completed any time the MSC observes a significant issue in the home related to health, safety or the environment*
 - ✓ *MSC/WSC/WCS should always have a SCOR form when they make a home visit*
- Once annually, when CAB is involved on behalf of a class member, MSC/WSC/WCS participate in a collaborative SCOR visit to OPWDD certified residences with the local CAB
 - ✓ *at a mutually convenient time or at a team meeting convened at the residence when the MSC/WSC/WCS and CAB are in attendance*

Expectations MSC, WSC & WCS:

Follow Up

Service Coordination Observation Report (SCOR)

- When SCORS are completed, MSC/WSC/WCS ensures that corrections are made by the residential agency within reasonable time frame
 - ✓ What is considered “reasonable” will vary
- Similarly, MSC/WSC/WCS reports delays in correction to the supervisor
 - ✓ Supervisor should contact residential agency regarding unresolved issues, or provide other follow up to facilitate corrections if delays are noted
 - ✓ Check back with supervisor to ensure that follow up has occurred
 - ✓ Another option: report to DQM for Immediate Jeopardy [IJ] or ID Imminent Danger [ID]
- *Beware of repeat SCOR citations, either the same issue or related*

Expectations MSC, WSC & WCS:

Activity Plan

- Required for Willowbrook class members receiving MSC
- MSC completes and includes as an attachment to the ISP
 - ✓ Describes certain short-term service coordination activities that are most important to the person.
 - ✓ Tracks activities to achieve valued outcomes or other goals
- Timeframes for completion ~ within 60 days of enrollment into the MSC program
 - ✓ Review at least every six months but activities may be added at any time
 - ✓ Reference the review of the Activity Plan in the MSC case notes

Expectations MSC, WSC & WCS:

Activity Plan “Best Practice”

- The MSC should complete the Activity Plan immediately following the ISP or other team review to track agreements from the meeting
- The Activity Plan may also be modified/updated following a meeting with the individual/advocate or after an important life changing event
- If the person changes MSC, the Activity Plan should be reviewed by the new MSC and revisions made to the form as appropriate

Activities for the Activity Plan

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Activities may include:

- Arrangements for new life experiences
- Follow up with a provider about a current issue or problem
- Discovering new ways to promote community inclusion
- Learning more about the person
- Resolving a difficult situation
- Identifying ways to help the person contribute at work, home and in the community

Activity Plan NOT designed to reflect:

- Ongoing services that are part of the routine maintenance of a person's ISP
- Required MSC activities
- Completion of required monthly notes or required MSC forms
- Writing, reviewing or updating the ISP, and convening ISP or other required meetings

Expectations MSC, WSC & WCS:

Notice of Rights

DO NOT REMOVE

NOTICE OF RIGHTS

is a member of the Willowbrook class and as such is entitled to certain rights and services which are guaranteed by a permanent injunction. This injunction was issued by the United States District Court for the Eastern District of New York on March 31, 1993 in the case of New York State Association for Retarded Children, et al., v. Cuomo, et al., 72 Civ. 356, 357.

A Notice of Rights must be placed in the consumer's file maintained by all providers of residential and habilitative services.

The consumer is represented by New York Civil Liberties Union (NYCLU) located at 123 Broad Street, 19th Floor, New York, NY 10038. The telephone number of the NYCLU is 212-693-2388. The consumer is also represented by New York Lawyers for Public Interest (NYLPI) located at 115 W. 30th St., 11th Floor, New York, New York 10018. The telephone number of the NYLPI is 212-366-6868. The consumer may also be entitled to be or is represented by the Consumer Advisory Board (CAB), an advocacy group located at 1005 Forest Hill Rd., Staten Island, New York 10314. The CAB's phone number is 718-475-8868. In addition to this special representation by the NYCLU, NYLPI and the CAB, the consumer may also be entitled to representation, like all other consumers, by the local office of the National Inpatient Legal Service (MILES). If any problems arise concerning the consumer's rights under the permanent injunction, the NYCLU, NYLPI, CAB, and MILES should be notified.

The following is a summary of the consumer's rights under the permanent injunction.

1. If the consumer is a resident of the Richmond Complex on Staten Island, the consumer has the right to high quality and appropriate medical and habilitative services, medical, dental and clothing, which at a minimum conforms to state and federal regulations. Consumers at the Richmond Complex also have the right to be prepared for placement in a small community residential, if it exists in the NYCLU will be notified of placement plan for consumers residing at the Richmond Complex by February 28, 1995.
2. If the consumer is not a resident of the Richmond Complex and is awaiting placement on February 28, 1995, the consumer is entitled to be placed pursuant to the approved placement plan by August 31, 1995. The placement will be maintained by the independent evaluator, pursuant to the permanent injunction.
3. Consumers who reside in community residential facilities on February 28, 1995 have the right to be maintained in that facility or another facility of equal or smaller residential capacity. The consumer can only be moved to a larger facility if a medical or treatment needs require it, or if the consumer requires such a move, or if the consumer is undergoing other residence at the facility or is substantially interfering with the operation of the facility, or if in the event of an emergency as defined in the permanent injunction.
4. If the consumer does not have an active family member or friend to act as a correspondent, the consumer is entitled to be represented by the Consumer Advisory Board.
5. The consumer is entitled to case management services from a case manager who has a case load of no more than 20 consumers.
6. The NYCLU, NYLPI, CAB, and MILES to the extent they represent the consumer, have access to the consumer, his or her records, and all facilities where the consumer receives residential or habilitative services.
7. The consumer has the right to a meaningful, full day habilitative program and services appropriate to his or her individual needs work days and meaningful, appropriate recreation and community integration weekly evening and weekend. These habilitative services and recreation shall meet applicable regulatory standards. Consumers with capacity have the right to refuse such services and recreation.
8. The consumer's development plan shall be reviewed at least annually by the consumer's program planning team. More frequent reviews may be requested where appropriate. The consumer, if he or she has

- NOTICE OF RIGHTS [Revised 5/2006], printed on sturdy purple paper stock, must be placed **prominently** in **each** class member's record
 - Required by Paragraph 17 of the Willowbrook permanent injunction
 - Includes residential, day and MSC/WSC/WCS records

Expectations MSC, WSC & WCS:

Personal
Expenditure
Plan (PEP)

~

Money
Management
Assessment

- Personal Expenditure Plan (PEP)
 - *If required by residential setting,* MSC/WSC/WCS ensures that the PEP is developed as part of team review process and ensure receipt of a copy for inclusion in case record
 - Non-agency payee doesn't have to do PEP
- Money Management Assessment
 - *If required by residential setting,* MSC/WSC/WCS ensures that this assessment is completed as part of the PEP process to reflect how much cash the class member can safely handle at any time and the frequency funds are provided
 - A copy of the assessment is included in the case record

Expectations MSC, WSC & WCS:

Team Reviews

- Team reviews for class members should occur as face-to-face meetings every 6 months and involve appropriate participants
 - ✓ *Willowbrook advocates may request quarterly meetings on behalf of an individual class member*
- MSC/WSC/WCS always makes every effort to ensure that the appropriate parties are invited and in attendance at team reviews
- MSC/WSC/WCS role differs based on class member's residential setting
 - ✓ *class in ICFs: QMRP schedules/invites the participants/facilitates the meeting ; WCS attends*
 - ✓ *class in nursing homes: facility schedules/invites the participants/facilitates the meeting; WSC attends*
 - ✓ *class receiving MSC and WSC [other than nursing homes]: MSC/WSC schedules/ invites the participants/facilitates the meeting*
- MSC/WSC/WCS responsible for informing MHLS of team reviews for class members

Expectations MSC, WSC & WCS:

Preparing for Team Reviews

- MSC/WSC/WCS confirms active representation
 - including relationship, frequency of contact and notification information
- MSC/WSC prepares review of the progress since the last meeting related to his/her goals/valued outcomes
 - Residence prepares review of progress when class member lives in ICF/nursing home
- MSC/WSC/WCS confirms that current assessments appropriate to the class member are reviewed and deemed current as written, completed or scheduled and appropriate documentation requested
- MSC/WSC/WCS advocates for safeguards as needed:
 - bed safety; hospital coverage; environmental adaptations; special diet; special medical considerations; aides, i.e., dentures, glasses, hearing aides, braces, positioning devices, adaptive appliances, ramps, etc.

Expectations MSC, WSC & WCS:

Willowbrook Plan of Services

- Class members must have an *annual plan of services based on current and appropriate assessment information*
 - By whatever name known, i.e., CFA, ISP. etc.
 - While goals/valued outcomes do not have to be in behavioral terms, the Willowbrook parties look for valued outcomes that exceed skill or ADL development
- Reflect active representation status
 - If family is involved, include relationship, contact information, frequency of visits, participation with team members
 - When applicable, guardianship arrangements
- Services should not be removed from the plan of services without discussion at a team meeting

What is the difference between current and annual assessments?

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- Information used by the team in developing the annual plan of services must be current; therefore, assessments must be reviewed annually to confirm the currency of the information
- **Current** means up-to-date information on a person's circumstances, needs, regulatory requirements and other generally professional practice
- If an assessment continues to be current, a notation and initials may be used in lieu of an annual assessment
- **Appropriate** will vary from one person to another based on individual need
 - ✓ What is appropriate for one person may not be appropriate for another
 - ✓ Assessments required by OPWDD regulation, i.e., medical, must be completed



Expectations MSC, WSC & WCS:

Active Representation

- Per the Willowbrook Permanent Injunction, active representation is...
 - ✓ ...Correspondent participation with the program planning team in planning and evaluating the person's plan of services; and/or visits the class member at least annually
- Merely signing consent forms sent through the mail or receiving phone calls initiated by staff with no other involvement
- Active representation is first and foremost for the class member
 - ✓ If the family is not meeting the standard of active representation, for whatever reason, and the class member cannot self-advocate, the class member should be referred to CAB
- MSC/WSC/WCS provider reports active representation status quarterly along with caseload reporting

Active Representation

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When the class member is a self advocate

- When a self-advocate...
 - ✓ Acts as their own correspondent
 - ✓ May also have co-representation from a family member or the CAB
 - ✓ In either instance, the class member gives his/her own consent for moves, release of information, participation in activities, routine medical/dental care, etc.
 - ✓ May also sign for invasive medical/dental treatment when determined to be capable of making the decision at hand

When the class member is NOT a self advocate

- The correspondent would be either...
 - ✓ A parent or legal guardian
 - ✓ Alternate family member
 - ✓ The Consumer Advisory Board (CAB)
- Family may fully represent the class member, elect to have CAB provide co-representation, or designate CAB to be the full representative
- If there is no family, the CAB is designated to provide full representation on behalf of the class member

Active Representation

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Expectations MSC, WSC & WCS:

Willowbrook Incident Management and Reporting

- Utilize the Guidelines for Willowbrook Incident Reporting and Other Notifications (dated 9/29/2011)
 - ✓ **Aka GREY** “Cheat Sheet”
- Guidelines are presented as an abbreviated grid as follows: By situation; Reference; Notify whom; How AND When?
- *Don't forget to keep the DDSO Willowbrook liaison informed of incidents involving class members*

Expectations MSC, WSC & WCS:

Willowbrook Incident Management and Reporting

- CAB receives OPWDD 147s and Special Incident Review Minutes of serious reportable incidents and allegations of abuse for all class members.
- For events/situations subject to Jonathan’s Law reporting, when CAB is correspondent or co-rep, Central CAB receives the OPWDD 147 and 148 automatically as well as the offer for a meeting.
- NYCLU receives the OPWDD 147 for allegations of abuse.
- NYLPI receives notice of death of class members, including QCC 100.
- Independent Evaluator receives notice of reportable/ serious reportable incidents and allegations of abuse/neglect for class members on Attachment 1 on monitoring status.

**Expectations
MSC, WSC &
WCS:**

**CAB
Communication
Protocol**

- **Official communication with the CAB, both verbal and written, is directed to the CAB Staten Island Office**
 - ✓ Official communication includes notifications required by the Permanent Injunction, policies and procedures, and regulations
 - ✓ Includes plan of services, i.e., ISPs, CFAs

OPWDD.CAB@opwdd.ny.gov

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- This represents the CAB **virtual** mailbox
 - Items may be sent via secure email by the MSC/WSC/WCS to CAB on behalf of class members they represent or co-represent
 - CAB places items in folders that can be accessed by the CAB Staten Island Office, assistant directors and CAB local representatives
 - The efficiencies are in time, paper and postage

Approved for CAB Electronic Transmission

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- Plans of care, i.e., CFAs and ISPs along with related documents for class members represented or co-represented by CAB
- Also, as email attachments:
 - death notification/CQC 100;
 - meeting related correspondence, i.e., invitations and confirmations; AND
 - requests for psychotropic medication/behavior plans
 - referral letters/referral packets;
 - informational letters to families re CAB representation;
 - all due process notification, including 30-day notices, and letters documenting temporary moves, emergency moves and time limited services elsewhere; and
 - routine consents, i.e., photos, camp, etc.

NOT Approved for CAB Electronic Submission

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- Incident related items, i.e.,
OPWDD 147/148; Special
Incident Review Meeting Minutes
- Requests for Informed Consent
for Invasive Medical Treatment

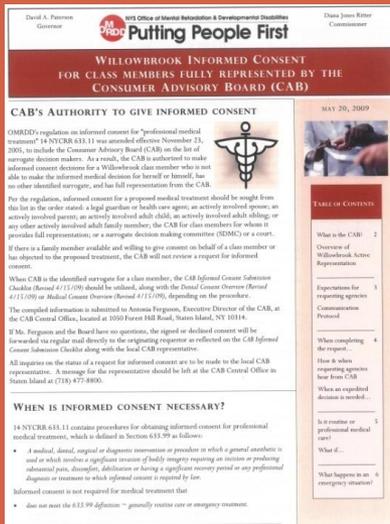
If a voluntary agency provides MSC/WSC/WCS

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- Contact the DDSO Willowbrook Liaison for orientation/training on the electronic communication protocol and to arrange for a secure message center account
- Otherwise paper mail is the only approved communication directly to Central CAB Office

Expectations MSC, WSC & WCS:

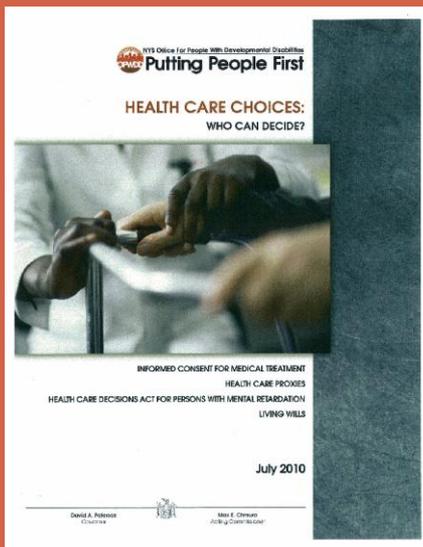
Willowbrook Informed Consent for Professional Medical Treatment



- Reference the document, **Willowbrook Informed Consent for Class Members Fully Represented by the Consumer Advisory Board**, reissued September 30, 2011
- Available on OPWDD's website as follows:
 - Go to <http://www.opwdd.ny.gov>
 - Select "News & Publications"
 - Select "Publications"
 - See "CAB Informed Consent"

Expectations MSC, WSC & WCS:

**DNR/DNI/LST for
class members
fully represented
by CAB**



- The law changed regarding issuance of DNR orders.
- Effective 6/1/10, the Health Care Decision Act (HCDA) process is followed for all decisions involving the withholding or withdrawing of life-sustaining treatment, including DNR/DNI/LST.
- Therefore, there is now one set of medical criteria and one surrogate list for all such decisions.
- DNR orders issued prior to June 1, 2010 remain effective.

Expectations MSC, WSC & WCS:

Community Inclusion Strategies



Per the Guidelines for Willowbrook Community Inclusion (9/30/2011), class members are to have:

- **Individual strategies** ~ based on capabilities and needs are incorporated into the person's plan of services
- **Variety** ~ that provides a rhythm of life based on the activities the class member enjoys
- **Frequency** ~ as often as possible based on need
- **Group size** ~ as small as possible as appropriate to the activity
- **Documentation** ~ to confirm implementation

Community Inclusion

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Is

- Activities from both home and day services that ensure the person:
 - ✓ *uses facilities that are typically used by community members;*
 - AND*
 - ✓ *...interacts with people who are not paid staff and who do not have a developmental disability*

Is Not

- Taking people around the community in large groups
- Bringing community individuals into segregated programs
- While appropriate and useful at times, recreation experiences do not meet the definition of community inclusion

Expectations MSC, WSC & WCS:

Community Inclusion Documentation



- Within the strategy
 - ✓ limitations that impact the class member’s frequency, i.e., clinical concerns, weather restrictions, health issues, preferences, etc.
- Within the documentation
 - ✓ Breakaways, i.e., if the class member arrives to an activity together with other people, and then splits up into smaller groups or goes out as individuals upon arrival at the destination.
 - ✓ Weather conditions/restrictions, clinical concerns, health issues, preferences, etc. that impacted on the class member’s participation in a planned community experience.

Expectations MSC, WSC & WCS:

Due Process Notification

Guidelines for Willowbrook Residential Notification (4/3/10)

Situation	Reference	Staff/Role*	How†	When‡
Hospital Stay (Medical)	CP-9 Green Book	<Comptroller >MSE >SC Supervisor >DSDO Inmate > D Peaky	Phone or e-mail (Phone only to C&J)	Immediately
Extended Hospital Stay (Medical)	031.03(a)(1)	<Comptroller > B Mueller, A Ferguson, MRL, EDDO Liaison, D Peaky	Letter DO NOT include placement response form	By 7 th day in hospital
Hospital Stay (Psychiatric)	CP-9 Green Book	<Comptroller >MSE >SC Supervisor >DSDO Liaison > D Peaky	Phone or e-mail (Phone only to C&J)	Immediately
Emergency & time limited services, e.g., social interventions, inmate therapy, stabilization, cognitive therapy	CP-9 Green Book	<Comptroller >MSE >SC Supervisor >DSDO Liaison > D Peaky	Phone or e-mail (Phone only to C&J)	Immediately
Emergency Transferred Inmate, e.g., moving for new hearing to open, timing of hearing due to file, discharge	CP-9 Green Book	<Comptroller > B Mueller, A Ferguson, MRL, EDDO Liaison, D Peaky	Letter DO NOT include placement response form	Within 24 hours
Planned Placement	CP-2 Green Book	<Comptroller >MSE > B Mueller, A Ferguson, MRL, EDDO Liaison, D Peaky	Letter Include placement response form	At least 30 days prior to proposed placement date
For placements from outside to large houses	Willowbrook Placement Response Form 4	>SC Supervisor >DSDO Liaison >D Peaky	Phone or e-mail	When recommended by the team
Emergency Placement	CP-9 Green Book	<Comptroller >MSE >SC Supervisor >DSDO Liaison > D Peaky	Phone or e-mail (Phone only to C&J)	Immediately
Conversion of Residential & Day Services	031.02, as appropriate	<Comptroller >MSE >SC Supervisor >DSDO Liaison > D Peaky	Letter Include placement response form	Within 24 hours
Conversion of Residential & Day Services	031.02, as appropriate	<Comptroller > B Mueller, A Ferguson, MRL, EDDO Liaison, D Peaky	Letter Include conversion response form	At least 30 days prior to proposed change date
Facility Expansion	Willowbrook Placement Response Form 4	>SC, SC Supervisor >DSDO Liaison > D Peaky, who facilitates completion of Facility Expansion Request with Willowbrook attorney	Phone or e-mail	Immediately - Discussion of issues with class members requires Willowbrook attorney approval

*Class CAB must be notified IMMEDIATELY if CAB serves as co-comptroller or co-comptroller. Do not use email for CAB notification. IN ADDITION, Advise B C&J of moves for class members on Admissions (1) on monitoring status, D Board of moves for class members on operations, C & J moved to the Willowbrook Campus.

- Utilize the **Guidelines for Willowbrook Residential Notification Aka Green “Cheat Sheet”** (dated 9/29/2011)
- Guidelines presented as an abbreviated grid **By situation; Reference; Notify whom; How AND When?**
 - ✓ Keep to the “when?” timeframes
 - ✓ Provides guidelines for *planned moves, emergency moves, conversion of residential and other services and expansion of certified capacity of homes serving class members*
- See *Beyond Willowbrook* sample letter formats
 - *for planned moves, temporary and emergency moves and for time limited services*
- Individual notices are sent consistent with active representation status

Due Process for Planned Moves

61

- Permanent Injunction requires 30 day written notification via due process forms for planned moves
- Use correct letter format, i.e., IRA or non-IRA
 - ✓ See *Beyond Willowbrook* sample letter formats for planned moves located at http://www.opwdd.ny.gov/willowbrook/hp_willowbrook_plannedmove.jsp
 - ✓ Match letter to placement proposal, NOT current residence
 - ✓ NO “hybrid” letters

Don't forget to copy the DDSO Willowbrook liaison and Lori Lehmkuhl, OPWDD Willowbrook liaison

Residential agencies should **NOT**...

62

- ...issue notification for planned or emergency moves for class members

OPWDD looks to the MSC/WSC/WCS to issue due process notices for class members

When issuing due process for planned moves...

63

- Remember necessary cc's and enclosures
 - ✓ For IRA planned moves
 - ✓ enclose Proposed IRA Placement Response Form, ISP and Summary of Rights for Willowbrook class members
 - ✓ For non-IRA planned moves,
 - ✓ enclose Proposed Placement Response Form, Community Services Plan or equivalent, Summary of Rights for Willowbrook class members, and Summary of Procedures for Responding to Placement Proposals

Don't forget to copy the DDSO Willowbrook liaison and Lori Lehmkuhl, OPWDD Willowbrook liaison

Emergency Notification

64

- “Emergency” is defined in Appendix L of Willowbrook Permanent Injunction
 - ✓ “The immediate and unplanned change of residence of a person due to a sudden and acute medical or psychotic episode, behavior constituting an imminent danger of serious harm to the resident or others, or any other change necessitating the immediate change of residence of the person”
- DDSO Willowbrook Liaison must be notified of hospital stays, emergency moves and moves for time limited services
- Reference “Green Book” CP9 for emergency moves:
 - ✓ Time limited services elsewhere [requires bed hold]
 - ✓ Emergency transitional or emergency permanent moves
 - ✓ “Green Book” located at http://www.opwdd.ny.gov/willowbrook/hp_willowbrook_community_placement.jsp

Emergency Notification

65

- Use correct letter format for emergency moves
 - ✓ See sample letter formats in *Beyond Willowbrook* web site at
http://www.omr.state.ny.us/willowbrook/hp_willowbrook_dueprocess.jsp
 - ✓ List necessary cc's [*don't forget cc's to the DDSO Willowbrook Liaison and Lori Lehmkuhl, OPWDD Willowbrook Liaison*]
 - ✓ Official communication ~ presented on letterhead with proper spelling and grammar

Special residential circumstance: Waiver of 30 day review for planned moves...

66

- MSC/WSC/WCS must follow the process if a waiver of the 30 day review period is required
 - ✓ Purpose of 30 day notice is to obtain consent from active representative AND give Willowbrook interested parties an opportunity to object
 - ✓ Follow due process consistent with CP2 of “Green Book”
 - ✓ Forward Lori Lehmkuhl copy of notification letter and request for waiver of 30 day review period with reason for request
 - ✓ Processed upon receipt of written agreement from active representative and MHLS written agreement to waive the 30 day review period
 - ✓ Ms. Lehmkuhl will obtain agreement from Willowbrook attorney

Special residential circumstance: Facility Expansion...

67

- Paragraph 6 of the Willowbrook Permanent Injunction requires that OPWDD maintain the size of community residences of class members
- When seeking to increase the certified capacity of any OPWDD certified program that serves class members, submit the *Request for Expansion of Community and Qualifying Facilities*
 - ✓ this includes requests to change the status of a temporary use bed (TUBS) to a regularly certified bed
- In addition to Willowbrook approval, it is still necessary to meet all other OPWDD applicable requirements related to an increase in residential capacity
- Follow the procedures set forth in the following DQM memoranda:
 - ✓ Willowbrook Residential Expansion dated 1/13/2003; and Provision of Emergency Services dated 6/4/2003
 - ✓ Both documents available for reference at http://www.opwdd.ny.gov/willowbrook/hp_willowbrook_dueprocess.jsp

Special residential circumstance: When the move is across DDSOs...

68

- The receiving DDSO Willowbrook liaison must be officially notified that a class member has/will move into district
- There can be NO disruption of case management/service coordination
- Ensure complete exchange of information across districts

Special residential circumstance: When moving out of New York State

69

- Notify the OPWDD Willowbrook Liaison and DDSO Willowbrook liaison of proposed move
- Follow CP2 of the **“Green Book”**
- It is important that the class member and advocate are aware that Willowbrook entitlements are only in place in NYS during planning and within due process notice
- Enclose copy of the Willowbrook Permanent Injunction along with other enclosures
- The class member is eligible for Willowbrook entitlements upon return to NYS

Expectations MSC, WSC & WCS:

Billing

- For MSC/WSC/WCS, a minimum of one face-to-face contact must be delivered and documented in order to bill for a month of service for a Willowbrook class member.
- There can be no billing for a class member without the face-to-face contact regardless of other activities provided by the MSC/WSC/WCS

EXPLANATION OF WCS AND OVERVIEW OF EXPECTATIONS FOR MSC/WSC/WCS

Willowbrook Case Services (WCS)

72

- WCS Reference document:

Willowbrook Case Services (WCS) ~ Entitlement for Services for Class Members Living In ICF/DDs
[Updated 10/10/11]

- Reviews the case management functions per the Willowbrook Permanent Injunction
- Provides guidance and explanation of services for the Willowbrook Case Services Coordinator and ICF QMRP

Advocacy: The WCS Coordinator protects and upholds the rights/entitlements of class members

73

ICF/QMRP

- Ensures implementation of ICF federal and state laws and regulations regarding services

WCS Coordinator

- Advocates for implementation of ICF entitlements & class entitlements, i.e., *Safety/Physical Environment; Staffing; Active Representation; Active Treatment; Appropriate Services; Community Inclusion; Informed Consent; and Protection from Harm.*
- Advocates for hospital coverage; individualized strategies for community inclusion; money management; and “aging” services.
- Confirms *Notice of Rights* is prominently displayed in class member’s residential, day and case services records.

Advocacy: The WCSC shall ensure that procedural and substantive due process requirements are met

74

ICF/QMRP

- Ensures implementation of ICF federal and state laws and regulations regarding due process

WCS Coordinator

- With ICF, confirms that due process is met consistent with federal/state laws/regulations and Paragraph 15 of the Willowbrook Permanent Injunction.
 - *Particularly important if determined that ICF services are no longer needed or the class member is no longer eligible for ICF services.*
- Proactively advocates and actively involved in notification to Willowbrook interested parties, including due process preparation per OPWDD's *Beyond Willowbrook website*,
http://www.opwdd.ny.gov/willowbrook/hp_willowbrook_dueprocess.jsp

Advocacy: The WCSC ensures active representation for the class member and displays a long term view for growth, movement and independence

75

ICF/QMRP

WCS Coordinator

- Ensures active representation, either by the class member, family or the CAB.
- Confirms active representation status for submission to OPWDD on a quarterly basis along with caseload information.
- Advocates for opportunities to create personal independence and self-fulfillment, community inclusion, and on “aging” services.

Assessment: The WCSC shall ensure that all assessments for the class member are completed

76

ICF/QMRP

- The ICF/DD is responsible for the completion of required professional assessments.
- A money management assessment and Personal Expenditure Plan should also be completed by the ICF/DD.

WCS Coordinator

- Confirms completion and follow up of current, appropriate professional assessments of the class member's needs, per Paragraph 10b of the Willowbrook Permanent Injunction.
- Confirms completion of money management assessment and Personal Expenditure Plan.
- Upon receipt of appropriate assessment documentation, the WCS Coordinator reviews and maintains within the individual case record.

Program Plan Development: The WCSC shall ensure appropriate invitation and attendance at team meetings

77

ICF/QMRP

- Per ICF regulation, the IDT, *chaired by the QMRP*, develops the plan of needs/services; schedules/invites the participants and facilitates the team reviews.
- As part of the invitation process, the QMRP informs the class member and advocates of the review participants.

WCS Coordinator

- Notifies the MHLS of the IDT meeting.
- The WCS Coordinator is expected to attend team reviews on behalf of the class member.

Program Plan Development: The WCSC ensures the review of the plan of services at least annually or more often as requested

78

ICF/QMRP

- Per ICF/DD regulation, the QMRP schedules team reviews annually or more often *as necessitated by requests from relevant stakeholders.*
 - *Relevant stakeholders include the individual, correspondent or entities involved in the monitoring of services mandated by the Willowbrook Permanent Injunction such as the CAB or MHLS, to the extent it represents the class member.*

WCS Coordinator

- Informs the QMRP and IDT and further ensures reviews by the team more frequently if requested by the class member, the correspondent, CAB or MHLS, to the extent it represents the class member.

Record Keeping: The WCSC ensures that the record is maintained

79

ICF/QMRP

- Per ICF/DD regulation, the ICF maintains the individual's record and prepares monthly summaries of services and progress; and provide copies to the WCS Coordinator and class member, the correspondent, and CAB to the extent it represents the class member.

WCS Coordinator

- Maintains a case record of information from the ICF, which includes the Notice of Rights.
- Informs the QMRP and IDT and further ensures reviews by the team more frequently if requested by the class member, the correspondent, CAB or MHLS, to the extent it represents the class member.
- Regularly reviews all class member records and confirms that the Notice of Rights is prominently displayed.

Record Keeping: The WCSC prepares monthly case notes

80

ICF/QMRP

- Per ICF/DD regulation, the ICF maintains the individual's record and prepares monthly summaries of services and progress.

WCS Coordinator

- Case notes include documentation of WCS Coordinator contacts and advocacy with the service providers regarding the status of delivery of services and the class member/advocate regarding services and satisfaction.
- Case notes also track major events, changes and issues and follow the progress made by the class member.
- WCS Coordinator case note should conform to elements as described in the form, *Case Note for WCS/WSC 10b*.

Record Keeping: The WCSC ensures written notifications as required by OPWDD's Client Placement Procedures

81

ICF/QMRP

- The QMRP notifies the WCS Coordinator when the class member requires emergency services or hospital admission and participates with the WCSC on planning for alternate placement.

WCS Coordinator

- Actively participates in planning related to time limited or emergency moves, per OPWDD's Client Placement Procedures CP9.
- Actively participates in planning for alternate placement per OPWDD's Client Placement Procedures 1, 2, 6, 10.
- With ICF, the WCS Coordinator prepares due process notices consistent with letter formats in OPWDD's *Beyond Willowbrook* website, http://www.opwdd.ny.gov/willowbrook/hp_willowbrook_dueprocess.jsp

Linking: The WCSC assists in completing forms and applications; and performs other related duties

82

ICF/QMRP

- The IDT, chaired by the QMRP, links the class member to new services, as needed.
 - *Members of the team make referrals for new services, arrange services at generic agencies, accompany the class member to agencies providing services or arrange for a familiar person to do so, and are the primary entities completing forms and applications as necessary.*

WCS Coordinator

- *Assists as necessary based on individual circumstances.*

Support: The WCSC assists the class member and/or their family with unanticipated crisis intervention

83

ICF/QMRP

- The QMRP provides direct support to the class member and/or their family with unanticipated crisis intervention.

WCS Coordinator

- Assists the IDT in identifying additional clinical resources to aid the program participant's progress if the circumstance so warrant.

Coordination/Monitoring/Follow Up: The WCSC assures receipt of services in accordance with their plans and periodic reassessment of progress

84

ICF/QMRP

- The IDT, chaired by the QMRP, is the focal point for services and coordinates among all providers.

WCS Coordinator

- Monitors and follows up to make certain that the plan of services is developed, implemented and reassessed appropriately.
- As part of monitoring, reviews the program records, including documentation of community inclusion, and advocates for implementation of individual inclusion strategies and services per the plan.

Monitoring/Follow-Up: The WCSC ensures that relevant stakeholders are kept informed

85

ICF/QMRP

- Per ICF/DD regulation, the QMRP informs the WCS Coordinator, the class member's correspondent and/or CAB of the class member's progress in all matters related to the class member's care, treatment and development, to the extent that it represents the class member.

WCS Coordinator

- Ensures that the class member's representatives are kept informed of all matters relevant to care, treatment and development. In addition, further informs MHLS to the extent it represents the class member.

Monitoring/Follow-Up: The WCSC ensures appropriate follow up on incidents on behalf of the class member

86

ICF/QMRP

- The ICF provider is responsible for reporting, investigation, implementation of preventive actions and other follow-up on incidents.

WCS Coordinator

- Monitors the safety of the class member; makes certain that sufficient actions are taken by the provider to ensure protection from harm.
- Monitors timely completion of notification per the Willowbrook Permanent Injunction [*the Grey Cheat Sheet*].
- Should be alert to evidence of abuse or intimidation and advocate when the class member experiences an unusual number of incidents, which may reflect issues related to staffing, staff training and programming.

Discharge: The WCSC coordinates the termination of services no longer needed or for which the class member is no longer eligible

87

ICF/QMRP

WCS Coordinator

- If it is determined that ICF services are no longer needed by the class member or the class member is no longer eligible for ICF services, the WCS Coordinator advocates for the class member, is actively involved in discharge planning and implements appropriate due process per OPWDD's Client Placement Procedures and ensures notification of Willowbrook interested parties.

MSC and WSC implement all the functions from Appendix I

- The MSC/WSC performs the following on behalf of class members with consideration given applicable rights and entitlements per their residential situation and Willowbrook class entitlements:
 - ✦ Advocacy
 - ✦ Assessment
 - ✦ Program Plan Development
 - ✦ Recordkeeping
 - ✦ Coordination
 - ✦ Linking
 - ✦ Support
 - ✦ Monitoring
 - ✦ Follow Up
 - ✦ Discharge

**BILLING FOR WCS AND
CASE MANAGEMENT FOR
CLASS MEMBERS LIVING IN
NURSING HOMES OR
OTHERWISE NOT ELIGIBLE
FOR MSC**

State Paid Reimbursement for WCS or WSC

90

- Willowbrook Class Members who have Medicaid but are NOT eligible to receive Medicaid Service Coordination (MSC) due to residential setting.
- DDSO assists in identifying service provider.

NYC Special Information

91

- For NYC – DDSO to communicate to NYC Office service provider identified to serve specific individual(s) and effective date of service start by individual

Assign Price ID – Load

92

- DDSO/NYC Office - Assigns a Price ID with a 3rd letter of “V” for each provider that will provide this service
- DDSO/NYC Office - Transmits price template to Rate Setting with the assigned Price IDs and fee set by CARS, Rate Setting “loads” into database

Important Note on Price IDs

93

- Some providers may now have 2 or 3 Price IDs with a 3rd letter of “V” in the same district (in NYC) if provider already has a Price ID with a 3rd letter of “V” for State Paid Service Coordination to non-Willowbrook individuals
- Price will be DIFFERENT for WILLOWBROOK INDIVIDUALS

Authorized Individuals In CSEP

94

- DDSO/NYC Office to enter **each individual** to be authorized for this service in CSEP with a service record for showing –
 - the service provider
 - the assigned Price ID
 - service start date

Billing Instructions

95

- DDSO/NYC Office gives providers billing instructions
- OPWDD website www.opwdd.ny.gov links -
 - News & Publications
 - Forms
 - Central Operations – Payment Processing Unit
 - Billing Forms and Instructions

Voucher and Billing Form

96

- **Standard Voucher AC-92**
- **State Paid Services Billing Form for Non-Waiver/Non-Medicaid Individuals**
 - Complete 1 form for each service month/year by Price ID (WCS on separate form from CM provided to class members in Nursing Home/otherwise ineligible for MSC)
 - Complete per directions for “MSC” under “Service Types” on **Instructions Page**

Claiming Reimbursement

97

- Service provider submits completed Voucher and Billing Form **following month of service**
- Provider mails completed Voucher and Billing form to **Address at bottom of Billing Form**
- Questions? Contact Cheryl Stoll (518) 402-4333

For class members living in nursing homes or otherwise not eligible for MSC

98

- Agencies must confirm with DDSOs those class members served who are placed in nursing homes so that steps are taken to bypass the payment edit that denies state paid service coordination if an individual has Medicaid
- Similarly, agencies must confirm with the DDSO any other class member served not eligible for MSC and receiving WSC
- Agencies must notify DDSOs when class members enrolled in MSC are hospitalized 30+ days ~ DDSO will enter into CSEP and make arrangements for WSC billing with OPWDD Central Operations

**MONITORING
WILLOWBROOK
MSC/WSC/WCS**

DQM Monitoring and Oversight



100

DQM MSC REVIEW INSTRUMENT WILL BE UTILIZED

- DQM is developing a procedure to monitor WCS and WSC for use with MSC vendor protocol
- For class members living in ICFs, DQM already visits and does at least an annual full resurvey and will be able to identify programmatic concerns through those surveys

DQM WILL DO A 5% SAMPLE OF CLASS MEMBERS RECEIVING WCS/WSC.

FOR MSC, DQM WILL CONTINUE TO REVIEW ALL MSC SERVICES FOR CLASS MEMBERS IN IRAS

Willowbrook Concerns



101

- Are there sufficient voluntary agencies willing and sufficiently trained to serve class members?
- How will OPWDD ensure that class members who are self advocates or fully represented by family understand their options?
- How will compliance be ensured between the time a DDSO MSC separates and the voluntary agency assumes services?
- Beyond the DQM survey process, what monitoring will be put in place to ensure that class members receive their entitlements?

DDSO Follow Up



102

CONFIRM ACTIVE REPRESENTATION STATUS

- For all class members with no CAB, ensure that self advocates and/or families are not having issues with selection of a new provider if necessary
- If they require additional assistance, DDSO may provide or offer CAB assistance
- DDSOs will reach out if no response is received
- No unilateral decisions or assignments are to be made on behalf of the class member

DDSO Follow Up



103

FOLLOW UP COMMUNICATION:

- No Early Alert agencies may assume WCS or WSC for class members
- Lori Lehmkuhl will work directly with Antonia Ferguson in lieu of DDSO work with the local CAB representatives
 - *to facilitate selections when CAB is full representative*
 - *provide information for those CAB provides co-representation*

DDSO Follow Up



104

IF A TRANSITION IS NOT MADE IMMEDIATELY AT THE TIME OF THE SEPARATION OF THE DDSO MSC/CM, THE DISTRICT SHOULD IDENTIFY THE INTERIM PLAN FOR EACH CLASS MEMBER:

- Name of DDSO MSC/CM departing
- Name of class member
- If class member lives in an ICF, WCS functional independence
- Name of person covering the “gap” effective the separation date; confirmation of credentials and compliant caseload

DDSO Follow Up



105

**IF CHOICE MADE AT THE TIME OF THE SEPARATION,
THE DISTRICT SHOULD CONFIRM THE FOLLOWING
FOR EACH CLASS MEMBER:**

- Name of separating DDSO MSC/CM
- Name of class member
- When the class member lives in an ICF, WCS functional independence
- Name of new MSC/WSC/WCS; the effective date; confirmation of credentials and compliant caseload

DDSO Monitoring



106

In addition to DQM monitoring, DDSO Willowbrook liaisons will be critical in supporting voluntary agency training on and compliance with the Willowbrook entitlements for services, including but not limited to:

- active representation, face-to-face contacts and team meetings
- notification of hospital stays, emergency moves for time limited services and placement due process
- incident reporting/follow up
- receipt of other entitlements for services

Voluntary agencies must establish/maintain ongoing communication with DDSO liaisons on all Willowbrook matters.