

Compliance Summary Report

Compliance Summary Report of **Peace By Piece Cleveland Inc. 29Nov2013** on **Peace By Piece Cleveland Inc.**

Reviewer: **Mark Gadzinski**
Provider: **Peace By Piece Cleveland Inc.**
County Name: **Cuyahoga County**

Total Cites: **9**
Total POCs: **9**

CITE #1

Question	Explanation	
Is the service plan being implemented as written?	Re: ID#2, the service plan states Peace by Piece staff to provide safety and fire awareness instruction on a quarterly basis. There was no documented evidence this service was provided to ID#2 during the third quarter of 2013. The last documented fire and safety awareness instruction was provided on May 26, 2013.	
POC	Status	Comments
As of 11/19/13 PBPC will implement safety and fire awareness instruction on a quarterly basis with there consumers in which is stated in each ISP. Staff will report to Executive Director and show they have completed this support on a quarterly span with the consumer in order to prevent any future occurrences.	Approved	

CITE #2

Question	Explanation	
If the provider is responsible for providing Per Trip non-medical transportation, does the staff person have a form, signed form establishing the driver's physical qualification to provide non-medical transportation?	Based on interview with the executive director, and examination of Medicaid billing reports, it was determined that Peace by Piece Cleveland, Inc. provided per-trip non-medical transportation and billed for per-trip non-medical transportation during 2013 until October 2013. The provision of non-medical transportation was suspended in October because the agency provider realized that services were not in compliance with 5123:2-9-18. A physical examination, establishing the driver's physical qualification to provide non-medical transportation, was not secured by driver James Evans and driver Dave Fox, prior to providing non-medical transportation services in 2013.	
POC	Status	Comments
As of 11/19/13 PBPC will implement all examinations prior to providing NMT supports to consumers in accordance to rule 5123:2-9-18.As of 11/19/13 Examinations will include: Drivers Physical, and Controlled Substance test. As of 11/19/13 Vehicle Inspections will be checked daily confirming that the vehicle is in accordance with code 5123:2-9-18(D), and all other codes pertaining to Vehicle Inspections.(PBPC is not providing NMT supports currently at this time)	Approved	

CITE #3

Question	Explanation
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If the provider is responsible for providing non-modified transportation, are they using the correct type of vehicle for the service they are billing?

During the time when non-medical transportation was provided in 2013, the agency provider did not utilize a non-modified vehicle with a passenger capacity of nine or more, or a modified vehicle per 5123:2-9-18(E)(1)(b)(i-iv).

POC	Status	Comments
As of 11/19/13 PBPC will use a non-modified vehicle with a capacity of nine or more or a modified vehicle per 5123:2-9-18(E)(1)(b)(i-iv) when providing NMT supports to consumers. (In order to prevent future occurrences PBPC currently is not providing these supports at this time)	Approved	

CITE #4

Question	Explanation
If the provider is responsible for providing non-medical transportation, do all vehicles used to transport individuals have all required inspections?-Daily vehicle inspections-Annual vehicle inspection by the state highway patrol or certified mechanic.	During the time when per-trip non-medical transportation was provided in 2013, drivers did not complete daily vehicle inspections per 5123:2-9-18(D)(4).

POC	Status	Comments
As of 11/19/13 Vehicle Inspections will be checked daily confirming that the vehicle is in accordance with code 5123:2-9-18(D), and all other codes pertaining to Vehicle Inspections. (In order to prevent future occurrences PBPC currently is not providing these supports at this time)	Approved	

CITE #5

Question	Explanation
If the provider is responsible for providing Non-Medical Transportation, did the staff person receive testing for controlled substances and was the staff person found to be drug free prior to providing transportation services?	Based on interview with the executive director, and examination of Medicaid billing reports, it was determined that Peace by Piece Cleveland, Inc. provided per-trip non-medical transportation and billed for per-trip non-medical transportation during 2013 until October 2013. The provision of non-medical transportation was suspended in October because the agency provider realized that services were not in compliance with 5123:2-9-18. Testing for controlled substances to determine that a driver was drug-free prior to initially providing non-medical transportation, was not completed by driver James Evans and driver Dave Fox, prior to providing non-medical transportation services in 2013.

POC	Status	Comments
As of 11/19/13 PBPC will implement all examinations prior to providing NMT supports to consumers in accordance to rule 5123:2-9-18. As of 11/19/13 Examinations will include: Drivers Physical, and Controlled Substance test. As of 11/19/13 Vehicle Inspections will be checked daily confirming that the vehicle is in accordance with code 5123:2-9-18(D), and all other codes pertaining to Vehicle Inspections.(In order to prevent future occurrences PBPC currently is not providing NMT supports at this time)	Approved	

CITE #6

Question	Explanation
For provider staff members who are responsible for transporting individuals, did the provider ensure that a driver's abstract was completed prior to transporting individuals?	Based on personnel file review, there was no documented evidence that driver abstracts were obtained prior to transporting consumers, on employees James Evans, hired 4/1/13, and Shannon Klauer, hired 5/3/13. James Evans' abstract was completed on 11/13/13, and Shannon Klauer's abstract was completed on 8/1/13.
POC	Status Comments
As of 11/19/13 PBPC Executive Director will check and print all drivers abstract documentation prior to staff transporting individuals.	Approved

CITE #7

Question	Explanation
Does the waiver service delivery documentation for all waiver billing codes include the place of service?	The service delivery documentation for ID#1, ID#2, and ID#3 did not include the place of service whenever services were provided away from the consumer's residence.
POC	Status Comments
As of 11/19/13 PBPC will include and provide location, dates, staff initials, and duration of service at the location of service when supports are not at the location of the consumers ID#1, ID#2, ID#3, and all other PBPC consumers residents, on the second page of HPC documentation. Executive director will train staff how to document the correct location of support provided, and will have training classes for staff to prevent future occurrences.	Approved

CITE #8

Question	Explanation
Does the waiver service delivery documentation for all waiver billing codes include the description and details of the services delivered, including: Scope: The definition of each waiver service must describe in concrete terms the goods and services that will be provided to waiver participants, including any conditions that apply to the provision of the service. The definition of the service (including any conditions that apply to its provision) is termed the "scope" of the service.	The service delivery documentation for ID#1, ID#2, and ID#3 did not describe in concrete terms the goods and services provided to the waiver participants. For example, re: ID#1, documentation did not describe in detail the services provided at meal time. Service delivery documentation should have specified, per the ISP, staff assisting with cooking; healthy food choices; packing lunch for the next day. For ID#2, under supervision, service delivery documentation should have specified, per the ISP, reminders to not approach strangers and conversing with them. For ID#3, under behavior guidelines, service delivery documentation should have specified, per the ISP, reviewing safety rules each time before going out.
POC	Status Comments
As of 11/19/13 PBPC will describe in more elaborate detail the description of supports and services pertaining to "Scope of Service" on HPC documentation in relevance to consumers ID#1, ID#2, and ID#3 ISP, and all other PBPC consumers supports. Executive director will revise all consumers HPC documentation to verify that HPC docs are including "Scope of Service".	Approved

CITE #9

Question	Explanation
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Did all direct service staff receive training on each individual's ISP/BSP prior to implementation?

Based on personnel file review, there was no documented evidence that employees James Evans, hired 4/1/13; Shannon Klauer, hired 5/3/13; and Elizabeth Shannon, hired 7/18/13 received training on each individual's ISP prior to implementing services.

POC	Status	Comments
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As of 11/19/13 PBPC staff/new hires will meet with the Executive Director and go over each of their prospective consumers ISP prior to implementing any kind of support to that consumer. Staff will then sign off on ISP training form to verify they have received ISP training for that consumer in order to prevent any future occurrences.

Approved