

# Compliance Summary Report

Compliance Summary Report of **The Best Transportation 30Sep2013** on **The Best Transportation**

Reviewer: **Mark Gadzinski**  
 Provider: **The Best Transportation**  
 County Name: **Cuyahoga County**

Total Cites: **14**  
 Total POCs: **14**

## CITE #1

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 personnel file review, there was no documented evidence of the driver's physical qualification to provide non-medical transportation:Denise Bryson (began working with individuals 10/18/12)John Johnson (began working with individuals 2/4/13).	
POC	Status	Comments
Each staff person is required to submit a physical prior to employment. Physicals have to be renewed annually for all employees that transport non-medical transportation for DD consumers. Copies of physicals will be placed in each staff persons personnel file. The physicals of Denise Bryson, John Johnson have been located and are in the files.Person Responsible: Denise BrysonCorrective date: 9/26/13	Approved	

## CITE #2

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 personnel file review, there was no documented evidence the following employee had a drug screen prior to providing transportation services:Denise Bryson (began working with individuals 10/18/12). Darius VanHorn (began working with individuals 4/5/13). The only drug screen completed in 2013 was dated 6/7/13. There was a screen completed on 3/1/12, however, this was over a year prior to providing transportation services.	
POC	Status	Comments
The Best Transportation has a mandatory policy of drug testing for controlled substances. Each employee is required to submit a drug test prior to their hiring date. Each staff person is tested annually and that includes Denise Bryson, Bettye Bess, and Darius Van Horn. The drug tests have been placed in their personnel files. As of this date all employees have current drug tests and they are in their personnel folders.Person responsible for implementation: Denise BrysonCorrective Action: 9/26/13	Approved	

**CITE #3**

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 a driver's abstract was completed prior to transporting individuals, on the following employee:Denise Bryson (began working with individuals 10/18/12)	
POC	Status	Comments
It is the policy of The Best Transportation to ensure that each staff member submits a driver's abstract to us prior employment. Ms. Bryson did have the drivers abstract during the time she was transporting individuals but it was misplaced from her personnel file.Ms. Bryson is no longer a driver, but should she resume driving responsibilities an abstract will be completed.Person responsible for implementation: Betty BessCorrective action effective date: 9/26/13	Approved	

**CITE #4**

Question	Explanation	
For direct service staff, hired after 10/1/09, did the staff person receive initial training prior to providing services with individuals that included: • Overview of serving individuals with developmental disabilities • Overview of basic principles and requirements of providing HCBS waiver services • Initial rights training • Initial MUI training • Universal precautions	Based on personnel file review, the following staff persons did not receive the indicated initial training:Denise Bryson (began working with individuals 10/18/12) – there was no documented evidence of initial Rights, MUI, Universal Precautions training.Bettye Bess (began working with individuals 10/18/12) - there was no documented evidence of Rights, MUI, Universal Precautions training having occurred in 2012.Darius VanHorn (began working with individuals 4/5/13) – there was no documented evidence of the following initial training: Overview of DD, and Overview of Waiver Services.John Johnson (began working with individuals 2/4/13) - there was no documented evidence of the following initial training: Overview of DD, and Overview of Waiver Services.Robert Prayear (began working with individuals 1/19/13) - there was no documented evidence of the following initial training: Overview of DD, and Overview of Waiver Services.	
POC	Status	Comments
Although the training was received by Bettye Bess, Denise Bryson, and Darius Van Horn, the certificates have been misplaced. We have requested a copy of these certificates from Ms. Aggie Girt. Ms. Bess has retrained all employees on Oct 1, 2013. Each staff member will be trained upon hiring.Person responsible for implementation: Bettye BessCorrective action effective date: 10/1/13	Approved	

**CITE #5**

Question	Explanation	
Does the waiver service delivery documentation for all waiver billing codes include the provider identifier/contract number?	The provider did not ensure the waiver service delivery documentation included provider identifier/contract number.	
POC	Status	Comments
The Best Transportation immediately changed the Waiver service delivery documentation forms to include the provider's identification number.Effective date: 9/26/13Person responsible: Bettye Bess	Approved	

**CITE #6**

Question	Explanation	
Does the waiver service delivery documentation for all waiver billing codes include the medicaid identification # of recipient?	The provider did not ensure the waiver service delivery documentation included Medicaid number of the recipient.	
POC	Status	Comments
The Best Transportation Waiver service delivery documentation forms have been revised to include the Medicaid ID# of the recipient of service.Effective date: 9/26/12Person responsible: Bettye Bess	Approved	

**CITE #7**

Question	Explanation	
Did the provider staff, prior to direct contact with individuals, sign a statement attesting that the staff person would notify the provider within 14 days if they are ever charged with, plead guilty to, or are convicted of a disqualifying offense?	Based on review of personnel files, there was no evidence the following employees signed an attestation statement: Denise Bryson Bettye BessDarius VanHorn	
POC	Status	Comments
The Best Transportation will ensure that all staff will sign an attestation statement, attesting that they will notify us within 14 days if they are charged with, plead guilty to, or convicted of a disqualifying offense. All employees current and future will sign attestation statements prior to starting with our comp0any. Bettye Bess, Denise Bryson, and Darius Van Horn along with the remainder of the staff have all signed attestations statements as of Sept. 26, 2013.Person responsible for implementation: Denise BrysonCorrective Action: Sept. 26, 2013	Approved	

**CITE #8**

Question	Explanation	
Did the provider staff, prior to direct contact with individuals, sign a statement attesting that the staff person has never plead guilty to or been convicted of a disqualifying offense?	Based on review of personnel files, there was no evidence the following employees signed an attestation statement prior to direct contact with individuals: Denise Bryson Bettye BessDarius VanHorn	
POC	Status	Comments
The Best Transportation now has signed statements of every driver attesting they will notify the company prior to direct contact with individuals if they have ever been charged with, plead guilty to, or convicted of a disqualifying offense.The letter of attestation will be submitted to The Best Transportation before beginning their employment. The applicant must disclose to The Best Transportation any offense that has been previously expunged or sealed.Person responsible for implementation: Bettye BessCorrective action effective date: 9/26/13	Approved	

**CITE #9**

Question	Explanation	
<p>Did the provider staff have annual notification explaining conduct for which a DD employee may be included on the Abuser Registry?</p>	<p>Based on personnel file review, there was no documented evidence the following employees received notification explaining conduct for which a DD employee may be included on the Abuser Registry:Denise Bryson (began working with individuals 10/18/12)Bettye Bess (began working with individuals 10/18/12). Darius VanHorn (began working with individuals 4/5/13)</p>	
POC	Status	Comments
<p>The staff has received annual notification explaining the conduct for which a DD employee may be included on the Abuser Registry.Denise Bryson, Bettye Bess and Darius Van Horn all have received notification explaining the conduct for which a DD employee can be placed on the Abuser Registry.The annual notification is explained at our meetings and they will also receive written notification explaining the conduct that can lead to being placed on the Abuser Registry. Person responsible for implementation: Bettye BessCorrective action effective date: 9/26/13</p>	<p>Approved</p>	

**CITE #10**

Question	Explanation	
<p>Did the provider staff have an Abuser Registry check completed prior to direct contact with individuals?</p>	<p>Based on review of personnel files, there was no evidence an Abuser Registry check was completed prior to contact with individuals Denise Bryson (began working with individuals 10/18/12)Bettye Bess (began working with individuals 10/18/12). Check was done 2/21/13.Darius VanHorn (began working with individuals 4/5/13)John Johnson (began working with individuals 2/4/13). Check was done 2/21/13.Robert Prayear (began working with individuals 1/19/13). Check was done 2/21/13.</p>	
POC	Status	Comments
<p>: From now on, Abuser Registry checks will be completed on each staff person prior to direct contact with consumers. If Denise Bryson should resume providing transportation services, an Abuser Registry check will be completed prior to her providing services, and all other background checks will be current. An Abuser Registry check has been completed on Darius VanHorn immediately. (see attached Abuser Registry check). The Best Transportation agency provider will create a pre-hire background checklist which will need to be completed before each employee provides services to consumers.Effective date: ImmediatelyPerson responsible for implementation: Bettye Bess</p>	<p>Approved</p>	

**CITE #11**

Question	Explanation	
<p>Did the provider staff have a Nurse Aide Registry check completed prior to direct contact with the individuals?</p>	<p>Based on review of personnel files, there was no evidence a Nurse Aide Registry check was completed prior to contact with individuals Denise Bryson (began working with individuals 10/18/12)Bettye Bess (began working with individuals 10/18/12). Check was done 2/21/13.Darius VanHorn (began working with individuals 4/5/13)John Johnson (began working with individuals 2/4/13). Check was done 2/21/13.Robert Prayear (began working with individuals 1/19/13). Check was done 2/21/13.</p>	
POC	Status	Comments
<p>Effective immediately, all drivers that have direct contact With consumers will automatically have a Nurse Aid Registry completed prior to direct contact with consumers. Nurse Aide Registry checks have been completed on all employees and placed into their respective personnel folders.Person responsible for implementation: Bettye BessCorrective Action effective date: 9/23/13</p>	<p>Approved</p>	

**CITE #12**

Question	Explanation	
<p>Did the provider complete an FBI check on staff prior to direct contact with individuals if there is evidence that the staff person lived outside of Ohio within 5 years of employment?</p>	<p>Based on review of personnel files, the agency provider does not evidence a system in place that verifies five year residency in Ohio prior to hire. If it is determined that a potential employee has not lived in Ohio for a period of five years prior to hire, then a FBI background check is necessary.</p>	
POC	Status	Comments
<p>The Best Transportation has revised its employment application to indicate whether the potential employee has resided in the State of Ohio for a period of 5 years, and if not the potential employee will be required to submit a FBI background check.Person responsible for implementation: Bettye BessCorrective action effective date: 9/26/13</p>	<p>Approved</p>	

**CITE #13**

Question	Explanation	
<p>Did the agency provider/County Board maintain a log of unusual incidents which includes: • Name of Individual• Description of Incident• Identification of Injuries• Time/Date of Incident• Location of Incident• Preventative Measures</p>	<p>The 2013 log of unusual incidents did not evidence on a consistent basis the location of the incident, and did not evidence the time of the incident.</p>	
POC	Status	Comments
<p>From now on, The Best Transportation will complete the Incident Log in entirety, including the time and location of the incident. Staff will be re-trained on this MUI rule requirement, and will be re-trained on the new MUI rule that became effective 9/3/13.Person responsible for implementation: Bettye BessCorrective action effective date: 10/15/13</p>	<p>Approved</p>	

**CITE #14**

Question	Explanation	
<p>Did all direct service staff receive training on each individual's ISP/BSP prior to implementation?</p>	<p>Based on personnel file review, there was no documented evidence the following employees received training on each individual's ISP prior to providing services: Denise Bryson (began working with individuals 10/18/12)Bettye Bess (began working with individuals 10/18/12). Darius VanHorn (began working with individuals 4/5/13)John Johnson (began working with individuals 2/4/13). Robert Prayear (began working with individuals 1/19/13).</p>	
POC	Status	Comments
<p>Yes, all direct service staff has received training on each individual ISP/BSP prior to the implementation of transport. All drivers are briefed on any and all relevant information to the consumer. Each driver has received information that would be helpful to the different situations that may occur.The Best Transportation will maintain well documented evidence of all training and the evidence will be stored in the personnel files in a locked cabinet.Person responsible: Bettye BessCorrective action date: 10/1/13</p>	<p>Approved</p>	