

Compliance Summary Report

Compliance Summary Report of **Agency Review Tool 3/31/14** on **My Independence LLC**

Reviewer: **Lisa Ahlersmeyer**
 Provider: **My Independence LLC**
 County Name: **Hamilton County**

Total Cites: **27**
 Total POCs: **27**

CITE #1

Question	Explanation	
<p>Was the provider staff's name checked against the U.S. general services administration system for award management database?</p>	<p>The agency provider did not ensure the following staff names were checked against the general services administration system for awards management database: Jackie Humphries 9/12/13, Toni Larkin 1/6/12, Freda Love 7/17/14, Cherie Scott 8/13/13, Margaret Thomas 7/8/13, Dolly Joash 8/25/10</p>	
POC	Status	Comments
<p>Plan of Correction (POC): Who is responsible for POC: Lisa Cobbs, Administrator What is the POC: March 3, 2014, Lisa Cobbs checked the general services administration system for awards management database for Jackie Humphries, Toni Larkin, Freda Love, Cheri Scott, Margaret Thomas and Dolly Joash. Lisa Cobbs will check current employees by March 30, 2014 on this data base as well. Ongoing/Future Systems: Effective March 3, 2014, Lisa Cobbs will ensure that all future possible candidates for employment as well as current employees of MYI, be checked against the general services administration system for awards management database. Lisa Cobbs will check current employees by March 30, 2014 on this data base as well. Effective March 3, 2014, Lisa Cobbs will ensure that his among other ODODD requirements will be listed on a check list that will be view monthly to ensure that all employees (new hire and current) are current on all required checks per ODODD rules. How will the POC be implemented: March 3, 2014, Lisa Cobbs, on her computer verified that the above named employees were not listed on the general services administration system for awards management database. When will the POC be implemented: March 3, 2014, Lisa Cobbs, completed the search on the general services administration system for awards management database for the above named employees. Supporting document: Copy of the general services administration system for awards management databaseresults for the above named employees. PREHIRE DATABASE BACKGROUND CHECKS LIST</p>	<p>Approved</p>	

CITE #2

Question	Explanation	
<p>Was the provider staff's name checked against the Inspector General's Exclusions list?</p>	<p>The provider agency did check the following staff names against the Inspector General's Exclusion list: Jackie Humphries (DOH 9/12/13) Toni Larkin (DOH 1/6/12) Freda Love (DOH 7/7/13) Cheri Scott (DOH 8/13/13) Margaret Thomas (DOH 7/8/13) Dolly Joash (DOH 8/25/10)</p>	
POC	Status	Comments
<p>Plan of Correction (POC): Who is responsible for POC: Lisa Cobbs, Administrator What is the POC: March 3, 2014 and in the future for all employees of MYI, Lisa Cobbs will check the Inspector General's Exclusion list for Jackie Humphries, Toni Larkin, Freda Love, Cheri Scott, Margaret Thomas and Dolly Joash. Note: Ongoing/Future Systems: Effective March 3, 2014 and in the future for all employees of MYI, Lisa Cobbs will ensure that all future possible candidates for employment as well as current employees of MYI, be checked against the Inspector General's Exclusion list database. Effective March 3, 2014, Lisa Cobbs will ensure that this among other ODODD requirements will be listed on a check list that will be viewed monthly to ensure that all employees (new hire and current) are current on all required checks per ODODD rules. How will the POC be implemented: March 3, 2014, on the computer, Lisa Cobbs verified that the above named employees were not listed on the Inspector General's Exclusion list database. When will the POC be implemented: Lisa Cobbs completed the search on the Inspector General Exclusion list March 3, 2014, for the above named employees and will do so for current and future potential employees of MYI. Supporting document: Copy of OIG results from the Inspector General's Exclusion list for the above named employees. PREHIRE DATABASE BACKGROUND CHECKS LIST</p>	<p>Approved</p>	

CITE #3

Question	Explanation	
Is there evidence that the agency provider/County Board completed a quarterly review of MUI reports to identify trends and patterns.	The provider did not complete a quarterly/semi annual/annual review of MUIs to identify trends and patterns.	
POC	Status	Comments
<p>Plan of Correction (POC):Who is responsible for POC: Brenda Gray-Johnson, PC; Lisa Cobbs, AdministratorWhat is the POC: By April 30, 2014, Brenda Gray-Johnson will ensure a quarterly/semiannual/annual review of MUIs to identify trends and patterns are completed for 2013 and the 1st quarter of 2014and for future review on their due date. Effective March 25, 2014 and in the future, Lisa Cobbs will prevent future citations on this subject by implementing the Business Intelligence for DayHabs (BID) software.Effective March 25, 2014 and in the future, Lisa Cobbs will ensure that BID will prevent future citations in the above areas by doing Incident reporting which will be complete, accurate, and timely and will replace most paper documentation with a database which will prevent future citations.How will the POC be implemented: Brenda Gray-Johnson will do the quarterly/semiannual/annual review of MUIs to identify trends and patterns by April 30, 2014 and for future reviews upon their due date. Effective March 4, 2014, Brenda Gray-Johnson will use a flash drive to save all reviews.Effective March 25, 2014, Lisa Cobbs will ensure that all employees are trained on the BID software by May 1, 2014 by conducting trainings through-out the month of April 2014 via on-line training and small group trainings.When will the POC be implemented: April 30, 2014, the quarterly/semiannual/annual review of MUIs to identify trends and patterns will be completed Brenda Gray-Johnson Effective March 25, 2014, Lisa Cobbs will ensure that all employees are trained on the BID software by May 1, 2014 by conducting trainings through-out the month of April 2014.</p>	Approved	

CITE #4

Question	Explanation	
<p>Is the service plan being implemented as written?</p>	<p>The provider did not ensure the service plan was implemented as written. The provider failed to produce evidence of written documentation upon request for goals identified in the current Individual Plan for the following individuals. Individual #4 Grocery shopping 1-2 times per week minimum frequency not met for December 2013, January 2014 and February 2014. Respond to emergencies 1 time per month frequency not met for January 2014. Wash and dry clothing 1-2 times per week. Frequency not met for December 2013 and February 2014. Provide transportation 1-5 times per week. Frequency not met for December 2013, January 2014 and February 2014. Individual #3. Move Individual between locations daily during shift. Frequency not met for November, December 2013. Toileting program. Frequency not met November, December 2013.</p>	
POC	Status	Comments
<p>Plan of Correction (POC): Who is responsible for POC: Brenda Gray-Johnson, PC What is the POC: Effective March 4, 2014 and in the future, Brenda Gray-Johnson will ensure that the Training/HIPPA Sign Off Sheet is signed, initialed, dated and the reason for review is done by all employees providing services for #3 and #4. Effective March 4, 2014 and in the future, Brenda Gray-Johnson will ensure that the Training/HIPPA Sign Off Sheet is placed in each of the individuals' binders. How will the POC be implemented: Effective April 9, 2014 Brenda Gray-Johnson will conduct training to all staff working with #4 and #3. The PC will sign off in the place provided on the Training/HIPPA Sign Off Sheet after confirming that the employee has read the My Plan and will review with the employee to ensure that he/she understands the My Plan. When will the POC be implemented: April 9, 2014 and in the future upon receipt of new ISP goals for individuals served by MYI, Brenda Gray-Johnson will conduct training to employees prior to the effective date of revised My Plan. Brenda Gray-Johnson will conduct a training on the following topics Wednesday, April 9, 2014: -The new/revised Training/HIPPA Sign Off Sheet. It will be held on Wednesday, April 9, 2014. -How to do Written documentation on services and skill developments identified in the individual's MY Plan-Review with employees on how to write documentation as well as meet the frequency of services and skills identified in the individuals' My Plan; with no gaps in services. Supporting document: Training/HIPPA Sign Off Sheet</p>	<p>Approved</p>	

CITE #5

Question	Explanation	
<p>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?</p>	<p>The provider did not ensure that Toni Larkin 1/6/12 was assessed by a physician and has a signed form indicating she capable of safe driving and passenger assistance.</p>	
POC	Status	Comments
<p>Plan of Correction (POC):Who is responsible for POC: Lisa Cobbs, AdministratorWhat is the POC: March 3, 2014 Lisa Cobbs informed employee, Toni Larkin to schedule an appointment with her physician to obtain a signed and written statement from her physician indicating her capable of safe driving and passenger assistance by March 15, 2014.How will the POC be implemented: March 3, 2014 Lisa Cobbs informed employee, Toni Larkin to schedule Doctor's appointment with her physician.When will the POC be implemented: Employee, Toni Larkin's, Physical Examination was 3/6/14Supporting document: A signed letter and written statement from Employee, Toni Larkin's physician, Elizabeth A. Dariot, D.O.</p>	<p>Approved</p>	

CITE #6

Question	Explanation	
<p>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?</p>	<p>The provider did not ensure that Toni Larkin 1/6/12 was tested for controlled substances and found to be drug free prior to providing transportation to individuals.</p>	
POC	Status	Comments
<p>Plan of Correction (POC):Who is responsible for POC: Lisa Cobbs, AdministratorWhat is the POC: March 3, 2014, Lisa Cobbs to inform employee Toni Larkin to have a drug screening to ensure that she is found free of any controlled substances and found to be drug free by March 5, 2014.How will the POC be implemented: Lisa Cobbs informed employee, Toni Larkin, to go to Concentra Medical Center to have a drug screen completed and results sent to MYI by March 5, 2014.When will the POC be implemented: Employee Toni Larkin's drug screen was completed March 5, 2014.Supporting document: Specimen Result Certificate with Final Result Disposition of "Negative".</p>	<p>Approved</p>	

CITE #7

Question	Explanation	
<p>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</p>	<p>The provider failed to produce documented evidence upon request of initial training including, Overview of serving individuals with developmental disabilities, Overview of basic principles of providing waiver services, Initial rights, major unusual incident training and universal precautions for staff member, Freda Love hired 7/17/13 Staff member Toni Larkin hired 1/6/12 was missing initial training in universal precautions, overview of DD and overview of waiver services.</p>	
POC	Status	Comments
<p>Plan of Correction (POC):Who is responsible for POC: Lisa Cobbs, AdministratorWhat is the POC:Lisa Cobbs, effective March 4, 2014, will establish a new system for documenting and filing completed required DODD initial training.Lisa Cobbs will ensure that effective March 4, 2014 employees Freda Love and Toni Larkin will provide proof of completion of said training by April 21, 2014.Effective March 4, 2014, if the above employees do not provide proof of completion of said training by April 18, 2014, they will be required to re-take the said training by April 19, 2014.By April 21, 2014, the above employees are to submit their training certificate to Lisa Cobbs. If the above employees do not present a certificate of completion by April 21, 2014, they will be suspended until they do so. April 21, 2014, Lisa Cobbs will assign an employee that has met the above required training and has a current certificate in their personnel binder in a secured locked location.April 21, 2014, if the above employees do not comply with the above, the employees will be suspended until completed by Lisa Cobbs. Lisa Cobbs will provide substitute staff in their place that has completed the above training. Lisa Cobbs will ensure that the title and description are on all sign-in sheets Effective March 4, 2014 and to avoid future citations on this topic, Lisa Cobbs will ensure that a copy of the certificates and copy of the sign-in sheet from said training are placed in the employee's personnel file upon completion and kept in a secured locked location at MYI. How will the POC be implemented: Effective March 4, 2014, Lisa Cobbs will ensure that all approved DODD Trainers present employees of MYI with a Certificate verifying their attendance and completion of the Initial training with the topics listed. Lisa Cobbs will ensure that on April 9, 2014 all the Staff at MYI, including the above employees will be trained on this procedure.Lisa Cobbs will ensure effective March 4, 2014, that the employees mentioned will request a copy of their certificate from their initial training by April 18, 2014 or they will be required to re-take the class on April 19, 2014.Lisa Cobbs will ensure that on April 21, 2014 the above mentioned employees are required to bring in certificate of completion from said training. April 21, 2014, Lisa Cobbs will suspend the above named employees and any future or current employees if they fail to produce evidence of the above said training. Effective March 4, 2014, Lisa Cobbs will ensure that all future and current employees of MYI will be required to turn in a copy of their certificate upon completion of the training.April 9, 2014 all employees of MYI will be trained on this topic.Effective March 4, 2014, Lisa Cobbs will ensure that the copy of the employee's training certificate is place in the employee's binder at MYI upon receipt, which is kept in a secured locked location.When will the POC be implemented: Lisa</p>	<p>Approved</p>	

CITE #8

Question	Explanation	
<p>For day waiver services, did the provider ensure that within the first 90 days of employment, new employees completed either: PATHS "Certificate of Initial Proficiency" program OR 8 hr orientation program that includes topics identified in rule?</p>	<p>The agency provider did not ensure the following staff within 90 days of employment completed either PATHS "Certificate of Initial Proficiency" program OR 8 hour orientation program that includes topics indetified in rule. Jackie Humphries 9/12/13 Toni Larkin 1/6/12 Freda Love 7/17/13 Cherie Scott 8/13/13 Margaret Thomas 7/8/13</p>	
POC	Status	Comments
<p>Plan of Correction (POC): Who is responsible for POC: Lisa Cobbs, Administrator What is the POC: March 3, 2014, Lisa Cobbs will ensure that Toni Larkin and Freda Love turn in a copy of their original 8-Hour Certificate by requesting it from the Attendance Verifier that conducted the training or they are to re-take the class and turn the certificate of completion by April 5, 2014. The Administrator will establish a new system for documenting and filing completed required DODD 8-Hour training while also ensuring that the title and description is on, all, certificates and/or sign-in sheets. Once MYI receives a copy of the certificates with the verifier's signature, a copy of the Certificate and/or sign-in sheet will be placed in each employee's file upon receipt of Certificate. How will the POC be implemented: The Administrator will ensure that all approved DODD Trainers present employees of MYI with a Certificate verifying the employee's attendance and completion of the Initial training. The Certificate must include all the elements of the initial 8-Hour Provider training. The employees mentioned above will have to request a copy of their certificate from the attendance verifier that did their initial training or they will be required to re-take the class by April 5, 2014. All future and current employees of MYI will be required to turn in a copy of their certificate upon completion of the training. The Administrator will ensure that the copy of the employee's training certificate is place in the employee's binder at MYI upon receipt. When will the POC be implemented: The employees mentioned above will have to request a copy of their certificate from the attendance verifier that did their initial training or they will be required to re-take the class by April 18, 2014. Lisa Cobbs will require the above named employees to re-take the above training on April 19, 2014, if they cannot provide evidence of and/or a certificate of completion for the said training. Effective March 4, 2014, all new hired employees will be oriented on ensuring that they turn in their certificate of completion to Lisa Cobbs upon completion of the 8-Hour Training. Supporting document: 8-Hour Certificates of Completion for Margaret Thomas, Jackie Humphries and Cheri Scott</p>	<p>Approved</p>	

CITE #9

Question	Explanation	
<p>For day waiver services, did the provider ensure that during the first year of employment, direct service staff are provided with: 1) a mentor 2) on-the-job training specific to each individual served and 3) 8 hrs of training specific to the provision of the day waiver service?</p>	<p>The agency provider did not ensure the following staff during their first year of employment were provided 1)a mentor 2)on-the job training specific to each individual served and 3) 8 hour training specific to the provision fo the day waiver service.Jackie Humphries 9/12/13Toni Larkin 1/6/12Freda Love 7/17/13Cherie Scott 8/13/13Margaret Thomas 7/8/13</p>	
POC	Status	Comments
<p>Plan of Correction (POC):Who is responsible for POC: Lisa Cobbs, AdministratorWhat is the POC: *item #1 (mentor)Effective March 4, 2014, Lisa Cobbs will continue to search for the criteria of *item #1 (mentor) of this citation. Effective March 4, 2014, Lisa Cobbs searched the Ohio Administrative Code 5123:2-3-08, Staff Training, and could not locate the Mentor requirement or a description of a Mentor; the qualifications and responsibilities. The Administrator will continue to research *item #1 (mentor) and will designate Brenda Gray-Johnson, PC to assume this role when found. Effective March 4, 2014, Lisa Cobbs will ensure that employees Jackie Humphries', Toni Larkin's, Freda Love's, Cherie Scott's and Margaret Thomas' documents confirming the specific elements of the above orientation/training are in their personnel file; the signature of the verifier confirming that the orientation/training was providedEffective March 4, 2014, Lisa Cobbs will ensure her signature and or Brenda Gray-Johnson, PC's signature as well as the signature of the employee acknowledging that they received orientation/training are in the above employees' personnel file which is kept in a secure locked location. Effective, March 4, 2014, Lisa Cobbs will ensure that all staff, prior to being hired, has an orientation/training, wherein Paragraph (B) (1) of 5123:2-3-08 elements are covered and are in their personnel file behind their application for hire. How will the POC be implemented: Effective March 4, 2014, Lisa Cobbs will ensure that all new-hired staff during their first year of employment, be provided with *item #1)a mentor 2)on-the job training specific to each individual served and 3) 8 hour training specific to the provision for the day waiver service by ensuring that they are file in the employee's personnel binder. Effective March 4, 2014, Lisa Cobbs will ensure there will be a document in the employee's file confirming that the specific elements of each referenced number (1 through 3) are listed along with the signature of the employee, the signature verifier that provided the orientation/trainingEffective March 4, 2014, Lisa Cobbs will ensure that her signature along with, Brenda Gray-Johnson, PC and the signature of the employee acknowledging they've received orientation on the above topics on each forms provided during orientation.When: Effective March 3, 2014, Lisa Cobbs will ensure that all new-hires within their first year of employment are provided with item *#1)a mentor 2)on-the job training specific to each individual served and 3) 8 hour training specific to the provision for the day waiver service. Supporting document: Copy of MYI New Employee Orientation Manual</p>	<p>Approved</p>	

CITE #10

Question	Explanation	
<p>For day waiver services, did the provider ensure that all direct service staff, beginning in the second year of employment, completed 8 hrs of training annually that includes Rights; MUI/UI; the employee's role in providing behavior support; and best practices related to the provision of the day waiver service?</p>	<p>The agency provider did ensure Toni Larkin (DOH 1/6/12) had annual training in best practices related to the provision of the day wavier service.</p>	
POC	Status	Comments
<p>Plan of Correction (POC):Who is responsible for POC: Lisa Cobbs, AdministratorWhat is the POC: Effective March 4, 2014, Lisa Cobbs will ensure to provide copy of Sign-In Sheet with the annual training in best practices related to the provision of the day wavier service.How will the POC be implemented: Effective March 3, 2014, Lisa Cobbs will ensure that a copy of The Training Sign-In Sheet is placed in employee, Toni Larkin's, personnel binder in a secured locked location at MYI. Effective March 4, 2014, Lisa Cobbs will advise Brenda Gray-Johnson, PC, to ensure that a copy of all Training Sign-In Sheets be placed in the individual personnel's binders upon completion of training in a secure locked place at MYI.When will the POC be implemented: March 3, 2014</p>	<p>Approved</p>	

CITE #11

Question	Explanation	
<p>During the review, was there evidence of any unreported incidents that should have been reported as either an Unusual Incident or a Major Unusual Incident?</p>	<p>The provider did not show evidence that all Major Unusual Incidents were reported.It was reported that staff Cheri Scott did not administer medication to individual #2. Ms. Scott also falsified on the MAR that she administered the medication. An discipline documentation was completed by the provider for the falsification, but, no MUI was submitted.</p>	
POC	Status	Comments
<p>Plan of Correction (POC):Who is responsible for POC: Lisa Cobbs, AdministratorWhat is the POC: Effective March 4, 2014 and in the future, Lisa Cobbs will ensure that an MUI is reported when a medication is missed and false documentation is put on the MAR. How will the POC be implemented: Effective March 4, 2014 and in the future, Lisa Cobbs will file a MUI and all reporting procedures will be followed when there is falsification of MARs or missed medication.When will the POC be implemented: Effective March 4, 2014 and in the future, Lisa Cobbs will ensure that any missed medication or falsification of the MAR will result in a MUI being reported to HCDDS' MUI unit per the requirements of ODODD.</p>	<p>Approved</p>	

CITE #12

Question	Explanation	
Does the staff person have a high school diploma or GED?	The provider did not ensure that direct service staff have either a high school diploma or GED.The provider failed to produce documented evidence of a high school diploma or G.E.D. upon request for staff member, Dolly Joash (2/25/10) and Toni Larkin (1/6/12)	
POC	Status	Comments
<p>Plan of Correction (POC):Who is responsible for POC: Lisa Cobbs, AdministratorWhat is the POC: Effective March 4, 2014, Lisa Cobbs will produce documented evidence of a high school diploma or G.E.D. for employee Dolly Joash and Toni Larkin by March 15, 2014.How will the POC be implemented:Effective March 4, 2014, Lisa Cobbs will advise Dolly Joash's to obtain evidence of high school diploma or GED by March 15th.Effective March 4, 2014, Lisa Cobbs will advise Toni Larkin to obtain evidence of high school diploma or GED by March 15th.Effective March 4, 2014, to prevent future citations in this area, Lisa Cobbs will ensure that all employees' required documents for employment are kept in one main binder for each employee; in a secured locked location. When will the POC be implemented: March 4, 2014.Lisa Cobbs, on March 4, 2014, advised employee Toni Larkin to obtain documented evidence of a high school diploma or G.E.D. by March 15, 2014.Lisa Cobbs, on March 4, 2014, advised employee Dolly Joash to obtain documented evidence of a high school diploma or G.E.D. by March 15, 2014.Supporting document: Evidence of a high school diploma or G.E.D. for Dolly Joash from Robert A. Taft High School RegistrarEvidence of a high school diploma or G.E.D. for Toni Larkin from Mt. Healthy City Schools</p>	Approved	

CITE #13

Question	Explanation	
Does the provider have current fire inspection?	The provider did not ensure that a current fire inspection was available for review.	
POC	Status	Comments
<p>Plan of Correction (POC):Who is responsible for POC: Lisa Cobbs, AdministratorWhat is the POC: Effective March 3, 2014, Lisa Cobbs will obtain another original copy of the current fire inspection by March 15, 2014. How will the POC be implemented: Effective March 3, 2014, Lisa Cobbs contacted Sharonville Fire Department to request another copy of the current fire inspection completed on 9/6/13.In the future, Effective March 3, 2014 and thereafter, Lisa Cobbs will ensure that future copies of completed fire inspection forms received are file in a binder in MYI's office upon receipt. When will the POC be implemented: The Annual Inspection Form that was completed on 9/6/13 was received by Lisa Cobbs, MYI via fax on 3/5/14 from Sharonville Fire DepartmentSupporting document: Sharonville Fire Department Annual Inspection form for My Independence, LLC.</p>	Approved	

CITE #14

Question	Explanation	
Did the provider/staff person providing HPC waiver services receive annual training in the principles to positive intervention culture?	The following staff did receive annual training in positive intervention culture Toni Larkin (DOH 1/6/12)Dolly Joash (DOH 8/25/10)	
POC	Status	Comments
Plan of Correction (POC):Who is responsible for POC: Brenda Gray-Johnson, PCWhat is the POC: Effective March 4, 2014, Brenda Gray to provide evidence that employees Toni Larkin and Dolly Joash received annual training on May 1, 2013 in positive intervention culture How will the POC be implemented: March 4, 2014, Brenda Gray-Johnson will ensure that the training sign-in sheet for the annual training in positive intervention culture be placed in the above employees' personnel binders in a secured locked location at MYI.When will the POC be implemented: March 4, 2014, Brenda Gray-Johnson placed a copy of the annual training in positive intervention culture it in each of the personnel binders of the employees named above . Supporting document: Training Sign-In Sheet for the positive intervention culture training with the above employee's signature; the Agenda and the hand-out that was used during the positive intervention culture Training.	Approved	

CITE #15

Question	Explanation	
Did the provider/staff person providing HPC waiver services receive annual training in self determination?	The following staff did not receive annual training in self-determinationToni Larkin (DOH 1/6/12)Dolly Joash (DOH 8/25/10)	
POC	Status	Comments
Plan of Correction (POC):Who is responsible for POC: Brenda Gray-Johnson, PCWhat is the POC: March 4, 2014, Brenda Gray-Johnson to ensure and provide evidence that employees Toni Larkin and Dolly Joash both received annual training in self-determination on May 1, 2013How will the POC be implemented: March 4, 2014, Brenda Gray-Johnson, to provide evidence that ensures that the above named employees did receive their annual training in self-determination.March 4, 2014 Brenda Gray-Johnson placed Training Sign-In Sheet in the above employees' personnel binders that are kept in a secured locked place at MYI.When will the POC be implemented: March 4, 2014, Brenda Gray-Johnson removed the sign-in sheet for annual training in self-determination from the training file and placed a copy of it in each of the personnel binder of the employees named above . Supporting document: Training Sign-In Sheet with the above employee's signature; the Agenda and the Self-Determination hand-out that was used during the training.	Approved	

CITE #16

Question	Explanation	
Did the provider staff have current first aid certification?	The provider did not ensure that staff member Toni Larkin (1/6/12) had current First Aid certification.	
POC	Status	Comments
Plan of Correction (POC):Who is responsible for POC: Lisa Cobbs, AdministratorWhat is the POC: Lisa Cobbs, effective March 3, 2014, advised employee Toni Larkin to complete First Aid training by March 3, 2014.How will the POC be implemented: March 3, 2014 employee Toni Larkin will take required course of First Aid training per the required elements per ODODD.When will the POC be implemented: March 3, 2014Supporting document: Copy of CPR/First Aid card for Toni Larkin	Approved	

CITE #17

Question	Explanation	
Did the provider staff have current CPR certification?	The provider did not ensure that staff member Toni Larkin (1/6/12) has valid CPR certification.	
POC	Status	Comments
Plan of Correction (POC):Who is responsible for POC: Lisa Cobbs, AdministratorWhat is the POC: Lisa Cobbs advised on March 3, 2014, advised employee Toni Larkin to complete her CPR training by March 3, 2014How will the POC be implemented: March 3, 2014 Toni Larkin will complete required course of CPR by attending approved ODODD CPR training.When will the POC be implemented: March 3, 2014Supporting document: Copy of current CPR/First Aid card for Toni Larkin	Approved	

CITE #18

Question	Explanation	
Did the provider staff have annual notification explaining conduct for which a DD employee may be included on the Abuser Registry?	The provider did not ensure that employee Dolly Joash 8/25/10 was given an annual written notification explaining the conduct for which the employee may be included on the Abuser Registry.	
POC	Status	Comments
Plan of Correction (POC):Who is responsible for POC: Lisa Cobbs, AdministratorWhat is the POC: Effective March 4, Lisa Cobbs, will ensure employee Dolly Joash is given an annual written notification explaining the conduct for which the employee may be included on the Abuser Registry by March 30, 2014.How will the POC be implemented: Prior to March 30, 2014, Lisa Cobbs will have employee Dolly Joash sign the annual written notification explaining the conduct for which the employee may be included on the Abuser Registry.When will the POC be implemented: March 20, 2014 Dolly Joash signed the annual written notification explaining the conduct for which the employee may be included on the Abuser Registry.Supporting document: Signed annual written notification explaining the conduct for which the employee may be included on the Abuser Registry by employee Dolly Joash dated March 20, 2014.	Approved	

CITE #19

Question	Explanation	
Did the provider staff have annual MUI training?	The provider did not ensure that Dolly Joash 8/24/10 had annual MUI training.	
POC	Status	Comments
<p>Plan of Correction (POC):Who is responsible for POC: Lisa Cobbs, AdministratorWhat is the POC: Effective March 4, 2014, Lisa Cobbs will ensure that employee Dolly Joash is informed to produce evidence of her annual MUI training Effective March 4, 2014, Lisa Cobbs will advise employee Dolly Joash to enroll in and complete her annual MUI training no later than April 21, 2014.Effective March 4, 2014, Lisa Cobbs will advise Dolly Joash that she will be suspended until she provides evidence of completion of the annual MUI training. Effective March 4, 2014, Lisa Cobbs, in the future, will check monthly on the expiration dates of all employees' trainings to ensure that they do not expire. How will the POC be implemented: March 4, 2014, Lisa Cobbs advised employee Dolly Joash of this POC verbally. When will the POC be implemented: Effective March 4, 2014, Lisa Cobbs will advise employee Dolly Joash to enroll in an annual MUI training and submit her proof of attendance by an approved DODD Provider of this training no later than April 18, 2014.Effective March 25, 2014, Lisa Cobbs will be implementing the Business Intelligence for DayHabs (BID) software that will address the above areas needing improvement the later part of 2014. The BID software will have a log of all staff training completed and scheduled.</p>	Approved	

CITE #20

Question	Explanation	
Did the provider have a copy of the current service plan?	The provider did not maintain a copy of the current service plan. The provider did not have a copy of the current service plan for individual #2. The plan was effective as of 11/15/13. The plan the provider had was labeled as draft plan.	
POC	Status	Comments
<p>Plan of Correction (POC): Who is responsible for POC: Brenda Gray-Johnson, Program Coordinator (PC) What is the POC: On March 4, 2014 and in the future, Brenda Gray-Johnson will ensure an original copy of the above individual's My Plan is placed in individual #2's binder; in a secured locked location of MYI. On March 4, 2014 and in the future, Brenda Gray-Johnson will ensure that an original copy of the above individual's My Plan is placed in individual #2's binder at her home. March 4, 2014 and in the future, Brenda Gray-Johnson will contact HCDDS to ensure an original copy is mailed or emailed to MYI prior to the new span date of the My Plan's commencement date. How will the POC be implemented: March 4, 2014 and in the future, Brenda Gray-Johnson will notify the service facilitator via email and/or phone call to ensure an original copy is mailed or emailed to MYI and to individual #2's home, 1 week prior to the new span date of the My Plan effective date. When will the POC be implemented: Effective March 4, 2014, and in the future, 1 week prior to the commencement date of the revised My Plan, Brenda Gray-Johnson will notify the service facilitator via email and/or phone call to ensure an original copy is mailed or emailed to MYI and to individual #2's home</p>	Approved	

CITE #21

Question	Explanation	
<p>Did the provider ensure that direct services are only provided by employees who do not have a disqualifying offense and who are not included on any of the databases identified in rule?</p>	<p>The provider did not ensure that the following direct services staff do not have disqualifying offense and who are not included on any of the database indentified in rule. Jackie Humphries (9/12/13) Margaret Thomas(7/8/13) Freda Love (7/17/13) Cheri Scott (8/13/13)</p>	
POC	Status	Comments
<p>Plan of Correction (POC): Who is responsible for POC: Lisa Cobbs, Administrator What is the POC: Effective March 4, 2014 and for future hires of MYI, Lisa Cobbs will obtain signed Attestation and Agreement to Notify Employer forms from the following direct services staff, Jackie Humphries, Margaret Thomas, Freda Love and Cheri Scott, attesting that they do not have disqualifying offense and are not included on any of the database identified in rule prior to their contact with the individuals and yearly thereafter. How will the POC be implemented: Effective March 4, 2014, Lisa Cobbs will ensure that in the future for all potential candidate of employment or current employees of MYI, each of the above named employees and current employees, will sign and date the Attestation and Agreement to Notify Employer form during the interview process and annually. Effective March 4, 2014, Lisa Cobbs will ensure that this process will be done during the interview process for potential employees and on an annual basis by all employees hired to work for MYI When will the POC be implemented: March 4, 2014, Lisa Cobbs will ensure, this POC will be implemented and enforced for the above named employees and any current or potential employees during their interview process and then annually for all current employees of MYI. Supporting document: Signed Attestation and Agreement to Notify Employer forms by Jackie Humphries, Margaret Thomas, Freda Love and Cheri Scott.</p>	<p>Approved</p>	

CITE #22

Question	Explanation	
<p>Did the provider complete a BCII check on staff prior to direct contact with individuals?</p>	<p>The provider did not complete a BCII check on direct service staff prior to direct contact with individuals. The provider did not ensure the following staff had BCII checks prior to contact: Jackie Humphries (9/12/13) Margaret Thomas (7/8/13)</p>	
POC	Status	Comments
<p>Plan of Correction (POC): Who is responsible for POC: Lisa Cobbs, Administrator What is the POC: Effective March 3 2014, Lisa Cobbs will instruct Jackie Humphries to obtain the "correct" BCII by March by March 4, 2014. Effective March 4, 2014, Lisa Cobbs will ensure that the "correct" BCI is completed for all employees upon receipt. Effective March 4, 2014, Lisa Cobbs will ensure that all employees prior to contact with the individuals complete a BCII. Effective March 4, 2014, Lisa Cobbs will ensure that all BCII's be filed immediately in the employee's file in locked location at MYI. How will the POC be implemented: Effective March 3, 2014 above employees was advised by Lisa Cobbs to go get their BCII's re-done at the agency's expense. When will the POC be implemented: March 3, 2014 Margaret Thomas completed BCI check March 4, 2014 Jackie Humphries completed BCI check Supporting document: BCI results for Margaret Thomas and Jackie Humphries</p>	<p>Approved</p>	

CITE #23

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 provider did not maintain a log of Unusual Incidents that included all required elements.</p>	
POC	Status	Comments
<p>Plan of Correction (POC):Who is responsible for POC: Brenda Gray-Johnson, PC; Lisa Cobbs, AdministratorWhat is the POC: Effective March 4, 2014 and in the future, Brenda Gray-Johnson will ensure that Unusual Incidents logs are created for 2013 and the 1st quarter in 2014, and all required elements by April 30, 2014 and the due dates thereafter.Effective March 25, 2014 and in the future, Lisa Cobbs will prevent future citations on this subject by implementing the Business Intelligence for DayHabs (BID) software.Effective March 25, 2014 and in the future, Lisa Cobbs will ensure that BID will prevent future citations in the above areas by doing Incident reporting which will be complete, accurate, and timely and will replace most paper documentation with a database which will prevent future citations.How will the POC be implemented: Effective March 4, 2014 and in the future, Brenda Gray-Johnson will be created the UI logs on her desk top computer while obtaining guidance for the required elements from the DODD's website under this topic are completed by April 30, 2014 and the due dates thereafter. March 4, 2014 and in the future, Brenda Gray-Johnson will create and save UI log, on her desk top computer and on a flash drive. Effective March 25, 2014, Lisa Cobbs will ensure that all employees are trained on the BID software by May 1, 2014 by conducting trainings through-out the month of April 2014 via on-line training and small group trainings. When will the POC be implemented: April 30, 2014 Brenda Gray-Johnson will ensure that the Unusual Incidents log be created and completed and on the required due dates thereafter.Effective March 25, 2014, Lisa Cobbs will ensure that all employees are trained on the BID software by May 1, 2014 by conducting trainings through-out the month of April 2014.</p>	<p>Approved</p>	

CITE #24

Question	Explanation	
<p>Did all direct service staff receive training on each individual's ISP/BSP prior to implementation?</p>	<p>The provider did not ensure that the following staff received training on the individual's service plan prior to implementation: Freda Love hired, 7/17/13, Jackie Humphries hired, 9/12/13, Dolly Joash hired, 8/25/10, Margaret Thomas 7/8/13 and Cheri Scott 8/13/13</p>	
POC	Status	Comments
<p>Plan of Correction (POC): Who is responsible for POC: Brenda Gray-Johnson, PC. What is the POC: March 4, 2014, Brenda Gray-Johnson will ensure that Freda Love's, Jackie Humphries', Dolly Joash', Margaret Thomas, Cheri Scott's proof of training on the individual's service plan prior to implementation are kept in their personnel files in a secure locked location at MYI. March 4, 2014 and in the future, Brenda Gray-Johnson will ensure that the Training/HIPPA Sign Off Sheet is completed by all employees working with the individual they are serving upon receipt of the new or revised My Plan. Effective March 4, 2014, Brenda Gray-Johnson will ensure that each staff read and review the My Plan prior to its effective span date prior to providing the new services. Effective March 4, 2014, Brenda Gray-Johnson will sign off on the Training/HIPPA Sign Off Sheet after confirming that the employee has read the My Plan. Effective March 4, 2014, Brenda Gray-Johnson will review with the employee the revised or new My Plan to ensure that he/she understands it. Effective March 4, 2014, Brenda Gray-Johnson will ensure that a copy of the Training/HIPPA Sign Off Sheet will be placed in each employee's file that is completed. Effective March 4, 2014, Brenda Gray-Johnson will ensure that a copy will be placed in the individual's file that the employee is serving. How will the POC be implemented: April 9, 2014, Brenda Gray-Johnson will conduct training to all staff as well as the above named employees on this POC. Effective March 26, 2014, Brenda Gray-Johnson will ensure that all staff will be notified on of the training that will be on April 9, 2014 to address this POC via in person, text messages and phone calls from Brenda Gray-Johnson. If a staff does not attend this training, Brenda Gray-Johnson will meet with the Staff one-on-one to ensure that the topics are covered by April 18, 2014. Brenda Gray-Johnson will ensure that if a staff does not receive the above training by April 18, 2014, MYI will replace the staff with another staff until such time as they complete the training. When will the POC be implemented: Brenda Gray-Johnson will ensure that effective March 26, 2014, all staff will be notified on of the training that will be on April 9, 2014 to address this POC via face-to-face, phone call, or text. Supporting document: Training/HIPPA Sign Off Sheet</p>	<p>Approved</p>	

CITE #25

Question	Explanation	
Did all direct service staff have initial training on actions to take in the event of a fire or other emergencies?	The following direct service staff did not have initial training on actions to take in the event of fire or other emergencies. Margaret Thomas 8/7/13Fred Love 7/17/13Jackie Humphries 9/12/13	
POC	Status	Comments
Plan of Correction (POC):Who is responsible for POC: Lisa Cobbs, AdministratorWhat is the POC: Per ODODD rule 5123:2-3-11 that is referenced in the "Supporting document" section below, effective April 9, 2014, Lisa Cobbs will ensure that all employees, current and future, follow the Staff training guidelines per ODODD for actions to take in the event of fire or other emergencies. How will the POC be implemented: Lisa Cobbs will ensure, during the all staff training on April 9, 2014, Margaret Thomas, Freda Love and Jackie Humphries will be trained on actions to take in the event of fire or other emergencies per the ODODD rules guidelines as well as the other staff members employed by MYI. When will the POC be implemented: April 9, 2014Supporting document: Copy of ODODD rule 5123:2-3-11 F outlining the Staff training elements.	Approved	

CITE #26

Question	Explanation	
Was the provider staff's name checked against the sex offender and child-victim offender database?	The provider agency did not ensure the following staff names were checked against the sex offender/child victim offender databaseJackie Humphries 9/12/13Toni Larkin 1/6/12Freda Love 7/17/13Cherie Scot 8/13/13Margaret Thomas 7/8/13Dolly Joash 8/25/10	
POC	Status	Comments
Plan of Correction (POC):Who is responsible for POC: Lisa Cobbs, AdministratorWhat is the POC: Effective March 3, 2014, Lisa Cobbs will ensure the following staff names are checked against the sex offender/child victim offender database for Jackie Humphries, Toni Larkin, Freda Love, Cheri Scott, Margaret Thomas and Dolly Joash. Ongoing/Future Systems: Effective March 3, 2014, Lisa Cobbs will ensure that all future possible candidates for employment as well as current employees of MYI, be checked against the sex offender/child victim offender database as required by ODODD.Effective March 3, 2014, Lisa Cobbs will ensure that this among other ODODD requirements will be listed on a check list that will be viewed monthly to ensure that all employees (new hire and current) are current on all required checks per ODODD rules.How will the POC be implemented: March 3, 2014, Lisa Cobbs, on the computer, verified that the above named employees were not listed on the sex offender/child victim offender database.When will the POC be implemented: March 3, 2014, Lisa Cobbs completed the search on the sex offender/child victim offender database March 3, 2014 for the above named employees and will complete for all current employees by March 30, 2014 and potential future employees in the futureSupporting document: Copy of Offender Search results from the Attorney General's Office for the above named employees.PREHIRE DATABASE BACKGROUND CHECKS LIST	Approved	

CITE #27

Question	Explanation	
<p>Was the provider staff's name checked against the database of incarcerated and supervised offenders?</p>	<p>The agency provider did not ensure the following staff names were checked against the incarcerated and supervised offenders database: Jackie Humphries 9/12/13, Dolly Joash 8/25/10, Toni Larkin 1/6/12, Fred Love 7/17/13, Cherie Scott 8/13/13, Margaret Thomas 7/8/13</p>	
POC	Status	Comments
<p>Plan of Correction (POC): Who is responsible for POC: Lisa Cobbs, Administrator What is the POC: March 3, 2014, Lisa Cobbs will check the incarcerated and supervised offender's database for Jackie Humphries, Toni Larkin, Freda Love, Cheri Scott, Margaret Thomas and Dolly Joash. Ongoing/Future Systems: Effective March 3, 2014, Lisa Cobbs will ensure that all future possible candidates for employment as well as current employees of MYI, be checked against the incarcerated and supervised offenders database. Lisa Cobbs will check current employees by March 30, 2014 on this database as well. Effective March 3, 2014, Lisa Cobbs will ensure that this among other ODODD requirements will be listed on a check list that will be view monthly to ensure that all employees (new hire and current) are current on all required checks per ODODD rules. How will the POC be implemented: March 3, 2014, Lisa Cobbs on her computer verified that the above named employees were not listed on the incarcerated and supervised offenders' database. When will the POC be implemented: March 3, 2014, Lisa Cobbs completed the search on the incarcerated and supervised offender's database for the above named employees. Supporting document: Copy of the incarcerated and supervised offender's database results for the above named employees. PREHIRE DATABASE BACKGROUND CHECKS LIST</p>	<p>Approved</p>	