

Compliance Summary Report

Compliance Summary Report of **Agency Review Tool 31Mar2014** on **Health Right, LLC dba Right at Home**

Reviewer: **Tammy Vorhis**
Provider: **Health Right, LLC dba Right at Home**
County Name: **Montgomery County**

Total Cites: **30**
Total POCs: **30**

CITE #1

Question	Explanation	
Is the service plan being implemented as written?	The provider did not ensure the service plan was implemented as written. Service delivery documentation for ID#1 could not be produced for the months of April through November 2013.	
POC	Status	Comments
All documentation will be turned in at the end of each month by their primary caregiver. It will be then scanned and stored in hardcopy, effective immediately. Documentation was lost via mail when SSA asked the caregiver directly to mail them to her office. Request was not approved thru Right at Home and was unaware the SSA contacted the caregiver directly regarding documentation. No copies were made. Attached is a statement from our Caregiver Molly Simon in regards to the incident.	Approved	

CITE #2

Question	Explanation	
Is the service plan being implemented as written?	The provider did not ensure the service plan was implemented as written. Three months of service delivery documentation was requested for review (January, February, & March 2014). The provider submitted documentation for the month of January 2014, but two Skill Development training goals (tooth brushing & hair brushing) that were supposed to be completed 1x weekly were not provided to ID#4. The provider failed to produce documentation for February and March, 2014.	
POC	Status	Comments
All documentation will be turned in at the end of each month by their primary caregiver. It will be then scanned and stored in hardcopy, effective immediately. All documentation will be turned in at the end of each month by their primary caregiver. It will be then scanned and stored in hardcopy, effective immediately.	Approved	

CITE #3

Question	Explanation	
If the staff person administers medication does the person have the appropriate certification for:- Oral or topical medications (Category 1)- G-tube/J-tube (Category 2)- Insulin injections (Category 3)	The provider did not ensure that staff administering topical and oral medications have the appropriate certification. Staff, Mary Soliday administers medication to ID#3; however, her medication administration certification expired on 6/14/2006.	
POC	Status	Comments

Contact has been made to SSA Michelle Brackman to formally remove task. Caregivers have never intentionally administered medication. In this case it does not apply because Mary Soliday has an active med-pass certification. Attached is Mary Soliday's current medication administration certification. 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: <ul style="list-style-type: none"> • 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 	The provider did not ensure that direct service staff hired after 10/1/09 had the required training prior to providing direct services. There is no evidence that Matthew Vingris received training in overview to serving individuals with DD, overview of basic principles & requirements of providing HCBS waiver services, or universal precautions.

POC	Status	Comments
All employees will be required to take the Intro to DD from The OACB Training Center, prior to contact with clients effective immediately.	Approved	

CITE #5

Question	Explanation	
Does the waiver service delivery documentation for all waiver codes include the type of service?	The provider did not ensure the waiver service delivery documentation included the type of service.	
POC	Status	Comments
All documentation will be turned in at the end of each month by their primary caregiver. It will be then scanned and stored in hardcopy, effective immediately.	Approved	

CITE #6

Question	Explanation	
Does the waiver service delivery documentation for all waiver billing codes include the signature of the person delivering service or initials of the person delivering the service if a signature and corresponding initials are on file with the provider?	The provider did not ensure the waiver service delivery documentation included the signature and/or the initials of the person delivering the services.	
POC	Status	Comments
All documentation will be turned in at the end of each month by their primary caregiver. It will be then scanned and stored in hardcopy, effective immediately. All documentation will be turned in at the end of each month by their primary caregiver. It will be then scanned and stored in hardcopy, effective immediately.	Approved	

CITE #7

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
All documentation will be turned in at the end of each month by their primary caregiver. It will be then scanned and stored in hardcopy, effective immediately. ID#4 Documentation is attached with Identifier/contact number of the recipient.	Approved	

CITE #8

Question	Explanation	
Does the waiver service delivery documentation for all waiver billing codes include the place of service?	The provider did not ensure the waiver service delivery documentation included the place/location of services.	
POC	Status	Comments
All documentation will be turned in at the end of each month by their primary caregiver. It will be then scanned and stored in hardcopy, effective immediately. ID#4 Documentation is attached with place/location of services that were delivered.	Approved	

CITE #9

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
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All documentation will be turned in at the end of each month by their primary caregiver. It will be then scanned and stored in hardcopy, effective immediately. ID#4 Documentation is attached with Medicaid number of the recipient.

Approved

CITE #10

Question	Explanation	
Does the waiver service delivery documentation for all waiver billing codes include the group size in which the services were delivered?	The provider did not ensure the waiver service delivery documentation included group size.	
POC	Status	Comments
All documentation will be turned in at the end of each month by their primary caregiver. It will be then scanned and stored in hardcopy, effective immediately.	Approved	

CITE #11

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 provider did not ensure the waiver service delivery documentation included a description of the services delivered.	
POC	Status	Comments
All documentation will be turned in at the end of each month by their primary caregiver. It will be then scanned and stored in hardcopy, effective immediately.	Approved	

CITE #12

Question	Explanation	
Does the waiver service delivery documentation for all waiver billing codes include the Description and details of the services delivered, including: Duration: The length of time that a service will be provided. A limit on the duration of services means that the service will no longer be provided after a specified period of time or, after a specified period of time, the necessity for the service is subject to review and reauthorization. The length of time the service is to be offered.	The provider did not ensure the waiver service delivery documentation included duration.	
POC	Status	Comments
All documentation will be turned in at the end of each month by their primary caregiver. It will be then scanned and stored in hardcopy, effective immediately.	Approved	

CITE #13

Question	Explanation	
Does the waiver service delivery documentation for all waiver billing codes include the description and details of the services delivered, including: Frequency: How often a service will be furnished to a beneficiary. The number of times the service is to be offered.	The provider did not ensure the waiver service delivery documentation included frequency.	
POC	Status	Comments
All documentation will be turned in at the end of each month by their primary caregiver. It will be then scanned and stored in hardcopy, effective immediately.	Approved	

CITE #14

Question	Explanation
Does the waiver service delivery documentation for all waiver billing codes include the date of service?	The provider did not ensure the waiver service delivery documentation included date of service. A staff timesheet was submitted indicating that 28 days of HPC services were provided to ID#1 from the period of April 13, 2013 through November 2, 2013. However, Right at Home was unable to provide HPC documentation verifying service delivery for these days.

POC	Status	Comments
All documentation will be turned in at the end of each month by their primary caregiver. It will be then scanned and stored in hardcopy, effective immediately.	Approved	

CITE #15

Question	Explanation
Does the waiver service delivery documentation for all waiver billing codes include the date of service?	The provider did not ensure the waiver service delivery documentation included date of service. A staff timesheet was submitted indicating that 28 days of HPC services were provided to ID#4 from the period of February 3, 2014 through March 24, 2014. However, Right at Home was unable to provide HPC documentation verifying service delivery for these days.

POC	Status	Comments
All documentation will be turned in at the end of each month by their primary caregiver. It will be then scanned and stored in hardcopy, effective immediately. Documentation was located in the client's binder at their home. Documentation is attached.	Approved	

CITE #16

Question	Explanation
Does the staff person have a high school diploma or GED?	The provider did not ensure that direct service staff has either a high school diploma or GED. Staff Amelia Hinkle, Troy Sly, and Matthew Vingris have no evidence of a diploma or GED in their personnel file.

POC	Status	Comments
All employees are required to present a copy their HS Diploma and/or GED, upon hire effective immediately. If a HS Diploma/GED is not presented we will call in a request for their transcripts, and until these documents are retrieved the employee will not be eligible to work for Right at Home. Copy of Matthew Vingris' and Troy Sly HS Diploma is attached. Copy of Amelie Hinkle's job application stating that she has graduated from Kettering Fairmont High School with a signed Applicant Statement. On April 28, 2014 we requested a copy of Amelia's transcript from Kettering Fairmont High School; we were notified that she dropped out of high school at the age of 18. We then contacted both Sinclair Community College and Ohio Medical Career College on April 28, 2014. Both Colleges do not have a copy of her transcripts, in which we found out that it is not required upon enrolling. Amelia Hinkle is no longer with the company as of January 20, 2014.	Approved	

CITE #17

Question	Explanation
Does the provider document services provided to the individual?	1.) A staff timesheet was submitted indicating that 28 days of HPC services were provided to ID#1 from the period of April 13, 2013 through November 2, 2013. However, Right at Home was unable to provide HPC documentation verifying service delivery for these days.2.) A staff timesheet was submitted indicating that 28 days of HPC services were provided to ID#4 from the period of February 3, 2014 through March 24, 2014. However, Right at Home was unable to provide HPC documentation verifying service delivery for these days.

POC	Status	Comments
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All documentation will be turned in at the end of each month by their primary caregiver. It will be then scanned and stored in hardcopy, effective immediately. Documentation was lost via mail when SSA asked the caregiver directly to mail them to her office. Request was not approved thru Right at Home and was unaware the SSA contacted the caregiver directly regarding documentation. No copies were made. Attached is a statement from our Caregiver Molly Simon in regards to the incident. ID#4 Documentation was located in the client's binder at their home for caregiver use. Documentation is attached.

Approved

CITE #18

Question	Explanation	
Did the provider/staff person providing HPC waiver services receive annual training in the principles to positive intervention culture?	The provider could not produce evidence that staff, Troy Sly completed annual training in principles to positive intervention culture.	
POC	Status	Comments
Troy Sly is registered to take the Annual training in Self-Determination on May 13, 2014. Currently enrolled online for the Intro to Developmental Disabilities course through the OACB Training Center.	Approved	

CITE #19

Question	Explanation	
Did the provider/staff person providing HPC waiver services receive annual training in self determination?	The provider could not produce evidence that staff, Troy Sly completed annual training in self-determination.	
POC	Status	Comments
Troy Sly is registered to take the Annual training in Self-Determination on May 13, 2014. Currently enrolled online for the Intro to Developmental Disabilities course through the OACB Training Center.	Approved	

CITE #20

Question	Explanation	
Did the provider staff have current first aid certification?	The provider did not ensure that employee; Lakuita Dews, had a valid First Aid certification.	
POC	Status	Comments
All employees will be subject to taking a yearly CPR & First Aid course provided by Tailored Training that Right at Home will coordinate and schedule for each employee.	Approved	

CITE #21

Question	Explanation	
Did the provider staff have annual training on the Rights of Individuals with DD?	The provider failed to provide evidence of rights training on an annual basis for staff, Troy Sly.	
POC	Status	Comments
All employees will be taking a yearly MUI Rights Training that Right at Home will coordinate and schedule for each employee.	Approved	

CITE #22

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 staff Lakuita Dews, Amelia Hinkle, or Troy Sly was given an annual written notification explaining the conduct for which the employee may be included on the Abuser Registry.	
POC	Status	Comments
All caregivers have signed the Abuser Registry, initially but will sign the notification on Abuser Registry yearly effective immediately.	Approved	

CITE #23

Question	Explanation	
Did the provider staff have annual MUI training?	The provider failed to provide documented evidence of annual MUI training for staff member, Troy Sly.	
POC	Status	Comments
All employees will be subject to taking a yearly MUI Rights Training that Right at Home will coordinate and schedule for each employee.	Approved	

CITE #24

Question	Explanation	
Did the provider staff have an Abuser Registry check completed prior to direct contact with individuals?	The provider did not complete an Abuser Registry check for staff Lakuita Dews, prior to contact with individuals. She was hired on 4/11/2012, and her Abuser Registry check was not completed until 9/17/2013.	
POC	Status	Comments
All employees will be processed thru the Abuser Registry prior to contact with clients, effective immediately.	Approved	

CITE #25

Question	Explanation	
Did the provider staff have a Nurse Aide Registry check completed prior to direct contact with the individuals?	The provider did not complete a Nurse Aide Registry check for staff prior to contact with individuals. Lakuita Dews- Date of Hire: 4/11/2012 Nurse Aide Registry Check Completed: 9/17/2013 Amelia Hinkle- No evidence of a Nurse Aide Registry Check in personnel file.	
POC	Status	Comments
All employees will be processed thru the Nurse Aide Registry prior to contact with clients, effective immediately.	Approved	

CITE #26

Question	Explanation	
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?	Staff member Troy Sly, hired on 11/5/2009 was not an Ohio resident for five years prior to employment. An FBI check should have been completed prior to 11/5/2009; however, it wasn't completed until 2/24/2011.	
POC	Status	Comments
Copy of Troy Sly's FBI check attached.	Approved	

CITE #27

Question	Explanation	
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?	There were no FBI checks completed for Sarah Braun or Matthew Vingris, and the provider was unable to produce evidence that either were Ohio residents for five years prior to employment.	
POC	Status	Comments
Sarah Braun has lived in the State of Ohio for over 20 years. Matthew Vingris has lived in the State of Ohio for over 20 years. Modified our Job Application to provide evidence that the employee has been an Ohio resident for five years prior to employment. Statement from Sarah Braun verifying her Ohio residents for five years prior to employment. Attached a copy of both Sarah Braun and Matthew Vingris' BCII. Copy of our new job application attached.	Approved	

CITE #28

Question	Explanation
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Did the provider complete a BCII check on staff prior to direct contact with individuals?

The provider did not complete a BCII check on Troy Sly prior to direct contact with individuals. Troy was hired on 11/5/2009 and a BCII check was not completed until February 2011.

POC

Status

Comments

All employees will be BCII Check prior to having contact with DODD clients, effective immediately.

Approved

CITE #29

Question	Explanation
Did all direct service staff receive training on each individual's ISP/BSP prior to implementation?	The provider did not ensure that staff Sarah Braun, Lakuita Dews, Amelia Hinkle, Troy Sly, or Matthew Vingris received training on the individual's service plan prior to implementation.
POC	Status Comments
Effective immediately we will implement a documented track sheet on all ISP trainings with employees.	Approved

CITE #30

Question	Explanation
Are all vehicles used to transport individuals covered by a current insurance policy that meets the requirements of the service provided?	The provider did not ensure that staff, Matthew Vingris is covered by a current insurance policy that meets the requirements of the service provided.
POC	Status Comments
Copy of the caregiver Matthew Vingris' current car insurance attached.	Approved