

HEALTH & WELFARE

C.L. "BUTCH" OTTER – Governor RICHARD M. ARMSTRONG – Director LESLIE M. CLEMENT - Administrator DIVISION OF MEDICAID Post Office Box 83720 Boise, Idaho 83720-0036 PHONE: (208) 334-5747 FAX: (208) 364-1811

November 12, 2008

Concepts Attn: Administrator PO Box 1280 Meridian, Idaho 83680

Dear Ms. Annette Nielson,

Thank you for submitting the Concepts Inc. Plan of Correction dated 10-27-2008. Survey and Certification has reviewed and accepted the Plan of Correction in response to the Department's Compliance Review findings. As a result, we have issued Concepts Inc. a full 2 year certificate effective from 11-12-2008 through 11-12-2010.

According to IDAPA 16.04.11.203.01, this certificate is contingent upon the correction of deficiencies. Your agency will be required to submit documentation to substantiate that you your Plan of Correction has been met. Documentation must be submitted within 7 days of the date of completion listed on your agency's plan of correction. All supporting documentation must be submitted no later than January 1, 2009. You may submit supporting documentation as follows:

Fax to: 364-1811, Attn Greg Miles Email to: milesg@dhw.idaho.gov Mail to: Medicaid, Health and Welfare

Attn Greg Miles, DD Survey and Certification

P.O Box 83720

Boise, ID 83720-0036

Or deliver to: Greg Miles

Division of Medicaid 3232 Elder St. Boise, ID 83705

You can reach me if you have any questions at 208-364-1828.

Thank you for your patience and accommodating us through the survey process.

Greg Miles Medical Program Specialist DD Survey and Certification

Submit by Email

Statement of Deficiencies

Developmental Disabilities Agency

Concepts, Inc.

4CONCEPTS096

1380 E Griffon St Meridian, ID 83642-(208) 861-1223

SIEVSY Type:

Recertification

Fittrance Date:

9/16/2008

Print Form

Exit Date:

9/16/2008

hitial Comments:

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Survey Team Members: Rebecca Fadness, DD Certification Program Supervisor; Greg Miles, Medical Program Specialist

Therapy Observations: The participant was observed on 9/17/08 in the community (at the Dollar store). Staff and participant were shopping for toy clothing. Staff assisted the participant to lock at various shirt tops that she may want to purchase. Staff prompted her (participant) to observe prices for the various items. Information was shared as to how much money the participant had to spend. After a short time, they proceeded to an area so as to pick out a pop to buy. Items were then taken to the check-out counter. Staff, and the clerk, reminded the participant to put her items on the counter and to give the clerk money for the items (although it was unclear if that 'reminder' was needed). They then left the store. It should be noted that no formal developmental objective was identified as receiving training during this time period.

Russ Reference/Text	Catagory/Findings	Plan of Correction (PDC)
16.04.11.600,01.a-d	Assessments	The Administrator will insure that the Developmental Specialist
	Developmental Assessment. It was not evident why an objective was chosen to work on (barrier to independence the program addresses) and how the implementation plan will resolve barriers in the community or home. •The information listed on the assessment as "needs" were only a list of deficit areas and did	will utilize the Medical Social & Developmental Information, specific developmental tools, as well as the necessary speech and language pathology, Occupational therapy, physical therapy, Psychological and hearing assessments. The Developmental Specialist will use these assessments to clearly identify the objectives, and goals that will be used to help the participant attempt to achieve his/her independence and overcome barriers in the community or home. The current I.Ps. will be reformatted by the Administrator to clarify how the objectives will be used to facilitate the participant's needs in the home and community. Each developmental assessment will summarize the needs of the participant and incorporate the recommendations from the

Developmental Disabilities Agency	Concepts, Inc.		9/16/200
	independence and current and relevant corresponding need. The information listed as "Interests" were not clearly applicable to developmental therapy.	respective disciplines. Each asses detall to develop and individual s The sample group will be correcte other participants will be correcte	upport plan. ed by January 01, 2009. All
Score and Severity: Widespread / No Actual Harm - Po		Bate to be Corrected: 03/1/2009	Administrator initials:
	Category/Finitings Assessments	Plan of Correction (PSC)	Tare to the state of the state
600. COMPREHENSIVE ASSESSMENTS CONDUCTED BY THE DDA. Assessments	Participant A, Medical/Social assessment did not recommended the type and amount of therapy.	The Administrator and Developmental Specialist will be responsible for reviewing all Medical/Social assessments to insure that the recommendations include type and amount of therapy needed. The sample group will be corrected by January 01, 2009. All other participants will be corrected by April 1, 2009.	
Scripe and Severity: Isolated / No Actual Harm - Poten	tial for Minimal Harm	Date to be Corrected: 01/01/2009	Administrator billais
Ruie Reference/Text	Category/Findings	Plan of Correction (POC)	
16.04.11.602.01	Assessments	Concepts Inc. will insure that all c	
602. REQUIREMENTS FOR CURRENT ASSESSMENT'S. Assessments must accurately reflect the current status of the participant. (7-1- 06) 01. Current Assessments for Ongoing Services. To be considered current, assessments must be completed or updated at least annually for	The Comprehensive Assessments were not completed or reviewed annually. (ie. 2 of 2 participant comprehensive developmental assessment were completed 2006, and participant#2 psychological assessment was completed 2002.	completed with the annual review. All necessary psychological evaluations will be updated at that time as well. The Developmental Specialist and Administrator will be responsive for obtaining or developing this information.	

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Pate to be Carrected 01/01/2009

Date to be Corrected: 01/01/2009

Scope and Saverity: Isolated / No Actual Harm - Potential for Minimal Harm

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Widespread / No Actual Harm - Potential for Minimal Harm

Adendrástrator initials:

Administrator Initials:

- b. Psychological Assessment
- c. Standardized Comprehensive Developmental Assessment

developmental disability diagnosis on file.

Participant #A, Scales of Independent Behaviorrevised (SIB-R) was expired. SIB-R evaluations for the purpose of functional eligibility must be completed on a yearly basis.

Standardized Comprehensive Developmental Assessments.

The Administrator and Developmental Specialist will insure that all documentation to support eligibility will be reviewed, revised or updated on an annual basis by the appropriate professional.

The sample group will be corrected by January 01, 2009. All other participants will be corrected by April 1, 2009.

Nata to be corrected 01/01/2009

Plan of Correction (PCC)

Administrator initials:

208-887-4978

Ruse Reference/Text 16.04.11.701.04.c 701. REQUIREMENTS FOR A DDA PROVIDING SERVICES TO CHILDREN AGES THREE THROUGH SEVENTEEN AND ADULTS RECEIVING IBI OR ADDITIONAL DDA SERVICES PRIOR AUTHORIZED UNDER THE EPSDT PROGRAM, Section 701 of these rules does not apply to participants receiving ISSH Waiver services. DDAs must comply with the requirements under Section 700 of these rules for all ISSH Waiver participants. (7-1-06)

Participant A, the Individual Program Plan (IPP) did not specified the frequency of service in accordance with the number of times the services would be offered during a week.

Category/Findings

Individual Program Plan

SurveyCnt: 579

The Administrator and Developmental Specialist are in the process of reformatting the IPP to reflect the necessary changes and to be in compliance with IDAPPA 16.04.11.701.04.c The new IPP will define the type, amount, durations of service as well as the frequency of service.

The Administrator and Developmental specialist meet monthly to review all participants service records.

94. Individual Program Plan (IPP) Definitions. The delivery of each service on a plan of service must be defined in terms of the type, amount, frequency, and duration of the service, (7-1-08) c. Frequency of service is the number of times service is offered during a week or month. (7-1-08) c. Frequency of service is the number of times service is offered during a week or month. (7-1-08) c. Frequency of service is the number of times service is offered during a week or month. (7-1-08) c. Frequency of service is the number of times service is offered during a week or month. (7-1-08) c. Frequency of service is the number of times service is offered during a week or month. (7-1-08) c. Frequency of services and frequency of the services and severity. (Program Plan Plan Plan Plan Plan Plan Plan Plan	Developmental Disabilities Agency	Concepts, Inc.		9/16/2008
Rule Instruments Concepts Inc.'s Policies and Procedures state that "all comprehensive assessments are to be completed prior to the completion of the PIP". This policy is to ensure that Concepts Inc.'s Policies and Procedures state that "all comprehensive assessments are to be completed prior to the completion of the IPP". This policy is to ensure that Concepts Inc.'s Policies and Procedures state that "all comprehensive assessments are to be completed prior to the completion of the IPP". This policy is to ensure that Concepts Inc. Is in completion of the IPP". This policy is to ensure that Concepts Inc. Is in completion of the IPP". This policy is to ensure that Concepts Inc. Is in completion of the IPP". This policy is to ensure that Concepts Inc. Is in completion of the IPP". This policy is to ensure that Concepts Inc. Is in completion of the IPP". This policy is to ensure that Concepts Inc. Is in completion of the IPP". This policy is to ensure that Concepts Inc. Is in completion of the IPP. This policy is to ensure that Concepts Inc. Is in completion of the IPP. This policy is to ensure that Concepts Inc. Is in completion of the IPP. This policy is to ensure that Concepts Inc. Is in completion of the IPP. This policy is to ensure that Concepts Inc. Is in completion of the IPP. This policy is to ensure that Concepts Inc. Is in completion of the IPP. The Administrator is responsible to insure that the guidelines set forth in Policies and Procedures will be followed. The Administrator will insure that the Developmental Specialist has all relevant comprehensive assessments completed prior to the completion of the IPP. The Administrator will insure that the Developmental Specialist has all relevant completion of the IPP. The Administrator will insure that the policies and Procedures will be followed. The Administrator will insure that the Developmental Specialist has all relevant completed prior to the completion of the IPP. The Administrator will insure that the Developmental Specialist has all relevant com	The delivery of each service on a plan of service must be defined in terms of the type, amount, frequency, and duration of the service. (7-1-06) c. Frequency of service is the number of times service is offered during a week or month. (7-1-			
16.04.11.701.05.a Individual Program Plan 701. REQUIREMENTS FOR A DDA PROVIDING SERVICES TO CHILDREN AGES THREE THROUGH SEVENTEEN AND ADULTS RECEIVING IBI OR ADDITIONAL DAS SERVICES PRIOR AUTHORIZED UNDER THE EPSDT PROGRAM. Section 701 of these rules does not apply to participants receiving ISSH Waiver services. DDAs must comply with the requirements under Section 700 of these rules for all ISSH Waiver participants. (7-1-06) 05. Individual Program Plan (PP). For participants three (3) through seventeen (17) years of age who do not use ISSH Waiver services, and for adults receiving EPDST services, the DDA is required to complete an IPP. (7-1-06) a. The IPP must be developed following obtainment or completion of all applicable assessments consistent with the requirements of this chapter. Individual Program Plan Participants A, the Individual Program Plan (Comprehensive assessments are to be completed prior to the completion of the PP. This policy to onsure that Concepts Inc. Is in compliance with IDAPPA rule 16.04.11.701.05.a The Administrator is responsible to insure that the guidelines set forth in Policies and Procedures state that "all comprehensive assessments is a complete of the required comprehensive assessments in the Comprehensive assessments that the guidelines set forth in Policies and Procedures state that "all comprehensive assessments are to be completed prior to the completion of the IPP. This policy to onsure that the guidelines set forth in Policies and Procedures state that "all comprehensive assessments are to be completed prior to the completion of the IPP. This policy to onsure that the guidelines set forth in Policies and Procedures state that "all comprehensive assessments are the completion of the IPP. This policy to onsure that the guidelines set forth in Policies and Procedures state that "all comprehensive assessments are to be completed prior to the completion of the IPP. This policy is on ensured to insure that the guidelines set forth in Policies and Procedures state that "all co	Scope and Saverity: Widespread / No Actual Harm - Po	tential for Minimal Harm	Date to be Corrected: 01/01/2009	Administrator mittals:
16.04.11.701.05.a Individual Program Plan 701. REQUIREMENTS FOR A DDA PROVIDING SERVICES TO CHILDREN AGES THREE THROUGH SEVENTEEN AND ADULTS RECEIVING IBI OR ADDITIONAL DAS SERVICES PRIOR AUTHORIZED UNDER THE EPSDT PROGRAM. Section 701 of these rules does not apply to participants receiving ISSH Waiver services. DDAs must comply with the requirements under Section 700 of these rules for all ISSH Waiver participants. (7-1-06) 05. Individual Program Plan (PP). For participants three (3) through seventeen (17) years of age who do not use ISSH Waiver services, and for adults receiving EPDST services, the DDA is required to complete an IPP. (7-1-06) a. The IPP must be developed following obtainment or completion of all applicable assessments consistent with the requirements of this chapter. Individual Program Plan Participants A, the Individual Program Plan (Comprehensive assessments are to be completed prior to the completion of the PP. This policy to onsure that Concepts Inc. Is in compliance with IDAPPA rule 16.04.11.701.05.a The Administrator is responsible to insure that the guidelines set forth in Policies and Procedures state that "all comprehensive assessments is a complete of the required comprehensive assessments in the Comprehensive assessments that the guidelines set forth in Policies and Procedures state that "all comprehensive assessments are to be completed prior to the completion of the IPP. This policy to onsure that the guidelines set forth in Policies and Procedures state that "all comprehensive assessments are to be completed prior to the completion of the IPP. This policy to onsure that the guidelines set forth in Policies and Procedures state that "all comprehensive assessments are the completion of the IPP. This policy to onsure that the guidelines set forth in Policies and Procedures state that "all comprehensive assessments are to be completed prior to the completion of the IPP. This policy is on ensured to insure that the guidelines set forth in Policies and Procedures state that "all co	Ruša Reference/Text	Catenery/Findings	Plan of Correction (PEC)	
Screen and Severity: Widespread / No Actual Harm - Potential for Minimal Harm - Date to be Corrected - 01/01/2009 Administrator initials:	701. REQUIREMENTS FOR A DDA PROVIDING SERVICES TO CHILDREN AGES THREE THROUGH SEVENTEEN AND ADULTS RECEIVING IBI OR ADDITIONAL DDA SERVICES PRIOR AUTHORIZED UNDER THE EPSDT PROGRAM. Section 701 of these rules does not apply to participants receiving ISSH Waiver services. DDAs must comply with the requirements under Section 700 of these rules for all ISSH Waiver participants. (7-1-06) 05. Individual Program Plan (IPP). For participants three (3) through seventeen (17) years of age who do not use ISSH Waiver services, and for adults receiving EPDST services, the DDA is required to complete an IPP, (7-1-06) a. The IPP must be developed following obtainment or completion of all applicable assessments consistent with the requirements of this chapter.	Participant A, the Individual Program Plan (IPP) was developed prior to the completion of the required comprehensive assessments.	comprehensive assessments are to completion of the IPP*. This policinc. Is in compliance with IDAPPA. The Administrator is responsible to set forth in Policies and Procedur. The Administrator will insure that has all relevant comprehensive as the completion of the IPP. The Administrator and Developm to make certain that this policy are the sample group will be corrected other participants will be corrected.	to be completed prior to the sy is to ensure that Concepts rule 16.04.11.701.05.a to insure that the guidelines res will be followed. The Developmental Specialist resessments completed prior to rental Specialist meet monthly and procedure is being followed. The deby January 01, 2009. Alled by January 01, 2009.

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Developmental Disabilities Agency	Goncepts, Inc.	9/16/200	
Ruia Reference/Text	Category/Finlings	Plan of Correction (PAC)	
16.04.11.703.03 703. PROGRAM IMPLEMENTATION PLAN REQUIREMENTS. For each participant, the DDA must develop a Program Implementation Plan for each DDA objective included on the participant's required plan of service. All Program Implementation Plans must be related	Program Documentation (data/progress) For all sampled participants, Data probes were averaged from several steps contained in the Program Implementation Plan, therefore data percentages did not specifically correlate to an individual objective. Targeted dates for criteria(s) to be met were not	Concepts Inc. is changing the monitoring of measurable, behaviorally-stated objectives on the plan of service. This change will effect all participants. Several steps will be still be listed on the Implementation plan however only probes from one of the steps will be measured by the Developmental Specialist. Concepts Inc. will have the staff continue working on several steps in the data probes but will only use the data from one identified probe. To clarify the percentages on a specific individual objective. The Administrator and Developmental Specialist meet monthly to review each participants plans of service. Targeted dates will be specified and all ranges will be eliminated.	
Med and Alba Askalliana (And to Min allows	The sample group will be corrected by January 01, 2009. All other participants will be corrected by April 1, 2009.	
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Rule Reference/Text	Category/Findings	Plan of Correction (POC)	
16.04.11.703.05	Setting for Service Delivery	The goals and tracking records will be changed to identify the	
703. PROGRAM IMPLEMENTATION PLAN REQUIREMENTS. For each participant, the DDA must develop a Program Implementation Plan for each DDA objective included on the	Environments for service delivery were not specifically identified.	types of environments where services will be provided. Specific goals noted for that environment will be listed as well.	

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Developmental Disabilities Agency	Concepts, Inc.	9/16/2008
participant's required plan of service. All Program Implementation Plans must be related to a goal or objective on the participant's plan of service. The Program Implementation Plan must be written and implemented within fourteen (14) days after the first day of ongoing programming and be revised whenever participant needs change. If the Program Implementation Plan is not completed within this time frame, the participant's records must contain participant-based documentation justifying the delay. The Program Implementation Plan must include the following requirements in Subsections 703.01 through 703.07 of this rule: (7-1-06) 05. Service Environments. Identification of the type of environment(s) where services will be provided. (7-1-06)		The Administrator and Developmental Specialist meet monthly to review each participants plans of service. The sample group will be corrected by January 01, 2009. All other participants will be corrected by April 1, 2009.
Score and Severity: Widespread / No Actual Harm - Po	tential for Minimal Harm	Date to be Corrected: 01/01/2009 Administrator initials:
Ruio Reference/Text	Category/Findings	Plan of Correction (PSG)
704.PROGRAM DOCUMENTATION REQUIREMENTS. Each DDA must maintain records for each participant the agency serves. Each participant's record must include documentation of the participant's involvement in and response to the services provided. (7-1-06) 01. General Requirements for Program Documentation. For each participant the following program documentation is required: (7-1-06) d. When a participant receives developmental therapy, documentation of six (6) month and annual reviews by the Developmental Specialist that includes a written description of the participant's progress toward the achievement of therapeutic goals, and why he continues to need		All six month and yearly reviews will contain the necessary documentation stating the need for further developmental services. If developmental services are no longer necessary that will be addressed as well. The Administrator and Developmental Specialist meet monthly to review each participants plans of service. The sample group will be corrected by January 01, 2009. All other participants will be corrected by April 1, 2009.

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Dula Bufanna /Touri	Category/Finalings		Plan of Correction IPSCI	
Ruse Ruse ====================================	Participant Reco	ગાવેક	Concepts Inc. is changing the trace	-king records to document the
705.RECORD REQUIREMEN		record did not document time o		-king records to document the
Each DDA certified under the			The Administrator and Developm	ental Specialist meet each
maintain accurate, current an			month to insure that each partici	
participant and administrative			document the date, time, duratio	n, and type of service, and
records must be maintained f	for at least five (5)		Include the signature of the indiv	· -
years. Each participant record			each service provided. Each signa	
individual's choices, interests			by credentials and the date signe	d.
result in the type and amount provided. Each participant re-			· ·	
document the date, time, dur			1	
service, and include the signa			The sample group will be correct	ad by langary 01, 2009
individual providing the service			All other participants will be corre	
provided. Each signature mu			The other porterpoine was be con-	2000 by 7.pm 1, 20031
both by credentials and the d				
agency must have an integra				
records system to provide pa information	ist and current			
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Date to be Corrected: 01/01/2009

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Widespread / No Actual Harm - Potential for Minimal Harm

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Developmental Disabilities Agency Concepts, Inc. 9/16/2006				
Rufe Reference/Text	Category/Findings	Pien of Correction (PBC)		
Rule Reference/Text 15.04.11.705.01.d 705.RECORD REQUIREMENTS. Each DDA	Participant Records Participant profile sheet did not contain fields that could identify special dietary needs.			
medical needs, and any other information required to provide safe and effective care; (7-1-06) Some and Soverity: Widespread / No Actual Harm - Provides and Soverity:		Date in he Corrected: 01/01/2009 Administrator hillass		
Rule Reference/Text	Satemory/Familings	Pian of Correction (PBC)		
16.04.11.705.01.f 705.RECORD REQUIREMENTS. Each DDA certified under these rules must maintain accurate, current and complete participant and administrative records. These records must be maintained for at least five (5) years. Each participant record must support the individual's	Assessments Participant needs were not listed in a narrative report. There were only deficits listed in a narrative style.	When writing the comprehensive developmental assessments, The Developmental Specialist will implement the narrative style to reflect the participant's needs and deficits as well as the assessment results and test scores when applicable, and narrative reports, signed with credentials and dated by the respective evaluators. All participants records will be updated to reflect the necessary change.		

Developmental Disabilities Agency	Concepts, Inc.		9/16/2008
choices, interests, and needs that result in the type and amount of each service provided. Each participant record must clearly document the date, time, duration, and type of service, and include the signature of the individual providing the service, for each service provided. Each signature must be accompanied both by credentials and the date signed. Each agency must have an integrated participant records system to provide past and current information and to safeguard participant confidentiality under these rules. (7-1-06) 01. General Records Requirements. Each participant record must contain the following information: (7-1-06) f. When assessments are completed or obtained by the agency, the participant's record must include assessment results, test scores when applicable, and narrative reports, signed with credentials and dated by the respective evaluators. (7-1-06)		The Administrator and Developme to ensure that Concepts Inc. is in co 16.04.11.705.01.f The sample group will be corrected other participants will be corrected	I by January 01, 2009. All
Scape and Severity: Widespread / No Actual Harm - Po	tential for Minimal Harm	Date to be Corrected 01,01,2009	Administrator bitials:
Adenhalstrator Signatura (confirms submission of PBC):	1) /cellsen		Date: 10/27/2009

Team leader Signature (signifies acceptance of PBC):

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