



C.L. "BUTCH" OTTER – Governor  
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IDAHO DEPARTMENT OF  
**HEALTH & WELFARE**

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January 14, 2010

James Moss, Administrator  
Living Independently Forever, Inc.  
8620 West Emerald Street, Suite 130  
Boise, ID 83704

Dear Mr. Moss:

Thank you for submitting the Living Independently Forever, Inc. Plan of Correction dated December 6, 2010. 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 Living Independently Forever, Inc. a full three-year certificate effective from November 14, 2010, through November 14, 2013.

According to IDAPA 16.04.11.203.01, your agency certificate was contingent upon the correction of deficiencies. The Department has received documentation to support your DDA agency's Plan of correction. The documented corrections submitted satisfy the Plan of Correction as written. Please assure the ongoing quality assurance processes continue to implement and monitor these changes.

Sincerely,

GREG MILES  
Medical Program Specialist  
Survey and Certification

GM/sm



# Statement of Deficiencies

Developmental Disabilities Agency

Living Independently Forever, Inc. dba LIFE  
4LIFE052

545 N Benjamin Ln Ste 155  
Boise, ID 83704-9625  
(208) 888-0076

**Survey Type:** Recertification

**Entrance Date:** 10/12/2010

**Exit Date:** 10/15/2010

**Initial Comments:** Survey Team: Eric Brown, Program Supervisor; Melissa Woods, Clinician; Greg Miles, Medical Program Specialist

Rule Reference/Text	Category/Findings	Plan of Correction (POC)
16.04.11.405.02.a-c  405. STANDARDS FOR PARAPROFESSIONALS PROVIDING DEVELOPMENTAL THERAPY AND IBI. When a paraprofessional provides either developmental therapy or IBI, the agency must assure adequate supervision by a qualified professional during its service hours. All paraprofessionals must meet the training requirements under Section 415 of these rules and must meet the qualifications under Section 420 of these rules. A paraprofessional providing IBI must be supervised by an IBI professional; a paraprofessional providing developmental therapy must be supervised by a Developmental Specialist. Paraprofessionals providing developmental therapy to children birth to three (3) must work under the supervision of a Developmental Specialist fully qualified to provide services to participants in this age group. For paraprofessionals to provide developmental therapy or IBI in a DDA, the agency must adhere to the following standards:	Supervision  For all participants reviewed, there was insufficient documentation found to indicate the Developmental Specialist gave weekly instruction and training to the para-professionals working with the participants. Initials were found which would indicate a review of data, but did not indicate the above mentioned criteria required by rule.	<ol style="list-style-type: none"> <li>1. Program Implementation Plans will be modified to include weekly review of data, as well as staff training and feedback. Developmental Specialists will be provided additional training, and be required to demonstrate awareness and proficiency of new standards.</li> <li>2. Changes will be program-wide.</li> <li>3. Developmental Specialists will be primarily responsible for completing weekly reviews, and will document their reviews on Program Implementation Plans.</li> <li>4. Program Director or designee will review a sample of Program Implementation Plans on a quarterly basis to ensure weekly reviews are being conducted and documented.</li> <li>5. Revision of Program Implementation Plans will begin following approval of POC and conclude within 90 days, while quarterly reviews will begin April 1, 2011.</li> </ol>

(7-1-06)  
 02. Frequency of Supervision. The agency must assure that a professional qualified to provide the service must, for all paraprofessionals under his supervision, on a weekly basis or more often if necessary: (7-1-06)  
 a. Give instructions; (7-1-06)  
 b. Review progress; and (7-1-06)  
 c. Provide training on the program(s) and procedures to be followed. (7-1-06)

**Scope and Severity:** Widespread / No Actual Harm - Potential for Minimal Harm

**Date to be Corrected:**

**Administrator Initials:** *[Signature]*

Rule Reference/Text	Category/Findings	Plan of Correction (POC)
<p>16.04.11.703.04</p> <p>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 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)</p> <p>04. Written Instructions to Staff. These instructions may include curriculum, interventions, task analyses, activity schedules, type and frequency of reinforcement and data collection including probe, directed at the achievement of each objective. These instructions must be individualized and revised as necessary to promote participant progress toward the stated objective. (7-1-06)</p>	<p>Program Implementation Plan</p> <p>For one of nine participants reviewed ([Participant 1]), documentation showed that progress was not being made and was below baseline. It further revealed that several months of data being below baseline occurred without a change being made to the programs. By definition (baseline as a initial point of skill level), this would indicate a needed adjustment to programming.</p>	<p>1. Developmental Specialists have already received training (see attached) regarding modifying objectives, baselines, establishing criteria, etc. Developmental Specialists will be provided ongoing training, and be required to demonstrate awareness and proficiency of new standards.</p> <p>2. Changes will be program-wide.</p> <p>3. Developmental Specialists will be primarily responsible for maintaining Provider Status Reviews, and will update them on a monthly basis.</p> <p>4. Program Director or designee will review a sample of Provider Status Reviews on a quarterly basis to ensure new standards are followed.</p> <p>5. Provider Status Review training has already been conducted, while quarterly reviews will begin January 1, 2011.</p>

Developmental Disabilities Agency

Living Independently Forever, Inc. dba LIFE

10/15/2010

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

Date to be Corrected:

Administrator Initials: *SM*

Administrator Signature (confirms submission of POE):

*[Handwritten Signature]*

Date: 12/6/10

Team Leader Signature (signifies acceptance of POE):

*[Handwritten Signature]*

Date: 12/22/10