



IDAHO DEPARTMENT OF
HEALTH & WELFARE

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March 28, 2013

James Moss, MPA, Administrator
Living Independently Forever, Inc.
545 North Benjamin Lane, Suite 155
Boise, ID 83704

Dear Mr. Moss:

Thank you for submitting the Plan of Correction for Living Independently Forever, Inc. dated March 1, 2013, in response to the complaint investigation survey conducted from January 28, 2013, through February 20, 2013. The Department has reviewed and accepted the Plan of Correction.

As a reminder, your certificate is based on substantial compliance with IDAPA 16.04.17 and is contingent upon the correction of deficiencies.

Thank you for your patience and accommodating us through the survey process. If you have any questions, you can reach me at 364-1828.

Sincerely,

FREDÉ TRENKLE-MACALLISTER
Medical Program Specialist
DDA/ResHab Certification Program

Enclosure

1. Approved Plan of Correction



Statement of Deficiencies

Residential Habilitation Agency

Living Independently Forever, Inc.
RHA-240

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

Survey Type: Investigation

Entrance Date: 1/28/2013

Exit Date: 2/20/2013

Initial Comments: Investigative Team: Eric Brown, Supervisor, DDA/ResHab Certification Program; and Fredé Trenkle-MacAllister, Medical Program Specialist, DDA/ResHab Certification Program.

Rule Reference/Text	Findings	Plan of Correction	Date to be Corrected
16.03.10.705.01.b 705. ADULT DD WAIVER SERVICES: PROVIDER QUALIFICATIONS AND DUTIES. All providers of waiver services must have a valid provider agreement with the Department. Performance under this agreement will be monitored by the Department. (3-19-07) 01. Residential Habilitation -- Supported Living. When residential habilitation services are provided by an agency, the agency must be certified by the Department as a Residential Habilitation Agency under IDAPA 16.04.17, "Rules Governing Residential Habilitation Agencies," and must supervise the direct services provided. Individuals who provide residential habilitation services in the home of the participant (supported living) must be employed by a Residential Habilitation Agency. Providers of residential habilitation services must meet the following requirements: (10-1-12)T	Review of agency records revealed that skill training was being conducted by a person (Employee 1) who was not qualified as a QIDP. The on-going training for direct care staff, written by Employee 1, included training regarding skills that were addressed in Participant 1's implementation plans, which included housekeeping, taking medications, personal hygiene, money management, and socialization.	<ol style="list-style-type: none"> Agency policies will be revised to require skill training be conducted by QIDP. Residential Habilitation Program Director and supervisors will receive training, and be required to demonstrate awareness and proficiency of new standards. Changes will be program-wide. Program Administrator will be primarily responsible for revising policies, while RH Program Director will be primarily responsible for implementation. Program Administrator or designee will conduct quarterly review of skill training records to ensure compliancy. Policy manual will be revised within 30 days and quarterly reviews will begin immediately thereafter. 	2013-03-28

b. All skill training for agency direct service staff must be provided by a Qualified Intellectual Disabilities Professional (QIDP) who has demonstrated experience in writing skill training programs. (3-29-12)

Rule Reference/Text	Findings	Plan of Correction	Date to be Corrected
<p>16.04.17.202.03.a</p> <p>202. ADMINISTRATOR. An administrator is responsible and accountable for implementing the policies and procedures approved by the governing authority. (3-20-04)</p> <p>03. Responsibilities. The administrator, or his designee, must assume responsibility for: (3-20-04)</p> <p>a. Developing and implementing written administrative policies and procedures which comply with applicable rules; (3-29-12)</p>	<p>Review of agency documentation revealed that the administrator did not assure the implementation of the policy for "Participant Supervision." Specifically, the policy for line-of-sight supervision at all times was not implemented.</p>	<ol style="list-style-type: none"> 1. Agency "line of sight" policy will be revised to include exceptions. A blanket line of sight policy is impractical and unable to accommodate some community placements. Residential Habilitation Program Director and supervisors will receive training, and be required to demonstrate awareness and proficiency of new standards. 2. Changes will be program-wide. 3. Program Administrator will be primarily responsible for revising policy, while RH Program Director will be primarily responsible for implementation. 4. Program Administrator or designee will conduct regular interviews with RH Program Director and supervisors to ensure compliancy. 5. Policy manual will be revised within 30 days and new standards will be implemented immediately thereafter. 	<p>2013-03-28</p>

Rule Reference/Text	Findings	Plan of Correction	Date to be Corrected
<p>16.04.17.202.03.b</p> <p>202. ADMINISTRATOR. An administrator is responsible and accountable for implementing the policies and procedures approved by the governing authority. (3-20-04)</p> <p>03. Responsibilities. The administrator, or his designee, must assume responsibility for: (3-20-04)</p> <p>b. Developing and implementing policies and procedures for agency staff and provider training, quality assurance, evaluation, and supervision; (3-29-12)</p>	<p>Review of agency documentation revealed that the administrator did not assure the implementation of the policy for Employee Supervision. Subsection "d" of the policy reads: "Paraprofessionals may not conduct evaluations or establish the IPP or PIPs. These activities must be conducted by the DDP."</p> <p>Employee 1 had the above activities listed on the job description under the Programmatic section, which was signed by Employee 1. Employee 1 did not have the qualifications to conduct these activities based on her education level.</p>	<ol style="list-style-type: none"> 1. Employee 1 has been reassigned to another position and will not longer conduct evaluations or establish PIPs. Residential Habilitation Program Director will receive additional training, and be required to demonstrate awareness and proficiency of existing standards. 2. Changes will be program-wide. 3. Program Administrator will be primarily responsible for conducting training, while RH Program Director will be primarily responsible for implementation. 4. Program Administrator or designee will conduct quarterly reviews of evaluations and PIPs to ensure compliancy. 5. Training will be completed within 30 days and quarterly reviews will begin immediately thereafter. 	2013-03-28

Rule Reference/Text	Findings	Plan of Correction	Date to be Corrected
<p>16.04.17.300</p> <p>300. POLICY AND PROCEDURE MANUAL. A policy and procedure manual must be developed by the residential habilitation agency for effectively implementing its objectives. It must be approved by the governing authority. Policies and procedures must be reviewed annually and revised as necessary. The manual must, at a minimum,</p>	<p>Review of the agency's policy and procedures revealed that the policy for Employee Supervision had not been reviewed and revised annually as necessary. The policy contained IDAPA rule references to a chapter that was repealed in 2011.</p>	<ol style="list-style-type: none"> 1. Program Administrator will conduct annual review of policy manual to comply with IDAPA standards. 2. Changes will be program-wide. 	2013-03-28

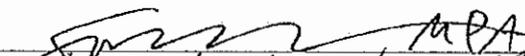
include policies and procedures reflecting the following: (3-20-04)

3. Program Administrator will be primarily responsible for completing annual reviews.
4. Policy Manual will include most recent review date on document header.
5. Policy Manual will be reviewed within 30 days and occur annually thereafter.

Rule Reference/Text	Findings	Plan of Correction	Date to be Corrected
<p>16.04.17.301.02</p> <p>301. PERSONNEL.</p> <p>02. Work Schedules. Coverage is scheduled to assure compliance with the Individual Support and Implementation Plans and all work schedules must be kept in writing. The agency must specify provisions and procedures to assure back-up coverage for those work schedules. (3-20-04)</p>	<p>Review of agency documentation revealed that the agency did not assure that staff coverage was in compliance with Participant 1's Individual Support Plan, which identified that the participant will be supported by 24-hour staffing.</p>	<ol style="list-style-type: none"> 1. Review of all Individual Support Plans has taken place to ensure compliancy. Residential Habilitation Program Director and supervisors will receive additional training, and be required to demonstrate awareness and proficiency of existing standards. 2. Changes will be program-wide. 3. Program Administrator will be primarily responsible for conducting training, while RH Program Director will be primarily responsible for implementation. 4. Program Administrator or designee will conduct quarterly reviews of Individual Support Plans to ensure compliancy. 5. Training will be completed within 30 days and quarterly reviews will begin immediately thereafter. 	<p>2013-03-28</p>

Rule Reference/Text	Findings	Plan of Correction	Date to be Corrected
<p>16.04.17.301.03.i 301. PERSONNEL. 03. Personnel Records. A record for each employee must be maintained from date of hire for not less than one (1) year after the employee is no longer employed by the agency, and must include at least the following: (3-29-12) i. Evidence of current CPR and First Aid certifications; and (7-1-95)</p>	<p>Two of 8 personnel files reviewed (Employees 1 and 7) revealed staff lacked evidence of current CPR and First Aid certifications.</p> <p>Employee 1's First Aid certification expired on December 7, 2012, and her CPR certification expired on December 7, 2010.</p> <p>Employee 2's First Aid and CPR certifications expired on December 22, 2012.</p>	<p>1. Agency utilizes a spreadsheet to track training dates, including CPR/First Aid certification. Residential Habilitation Program Director will be trained on use of spreadsheet, and be required to demonstrate awareness and proficiency of existing standards.</p> <p>2. Changes will be program-wide.</p> <p>3. RH Program Director will be primarily responsible for monitoring spreadsheet, as well as scheduling training sessions.</p> <p>4. Program Administrator or designee will conduct quarterly reviews of employee files to ensure compliancy.</p> <p>5. Spreadsheet training will be completed within 30 days and quarterly reviews will begin immediately thereafter.</p>	2013-03-28

Administrator/Provider Signature:



Date: 3/1/13

Department POC Approval Signature:



Date: 3/1/13

If deficiencies are cited, an approved plan of correction is requisite to continued program participation.