**Rule Reference/Text** | **Findings** | **Agency's Plan of Correction** (Please refer to the Statement of Deficiencies cover letter for guidance) | **Date to be Corrected** (mm/dd/yyyy)
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16.03.21.009.01 009. CRIMINAL HISTORY AND BACKGROUND CHECK REQUIREMENTS. 01. Verification of Compliance. The agency must verify that all employees, subcontractors, agents of the agency, and volunteers delivering DDA services have complied with IDAPA 16.05.06, “Criminal History and Background Checks.”

For 4 of 7 employee files reviewed, Criminal history and background check verifications were not completed within accordance of IDAPA 16.05.06.

For example:
Employee #1: Start: 05/26/17; CL: 08/14/15; Added 04/24/17 printed 07/10/17. The clearance letter was not printed within 14 days of availability.

Employee #2: start 1/16/17; clear 1/10/17 SD 1/9/17; added 12/19/16; hire 1/16/17. The clearance letter was not printed until 3/2/17 more than 14 days.

1. Clearance letters will be printed by HI Manager within 14 days of availability along with a dated signature and check of completion on the New Employee Checklist.
2. HI manager will review all remaining employee files and bring them to compliance to IDAPA 16.05.06 standards.
3. HI manager will make changes to New Employee Checklist to ensure compliance.
4. When new staff are hired, HI manager will use the administrator calendar to track timelines for compliance with this standard.
5. 6/15/2018
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<td>Employee #5: N-no documentation added previous CHC to the agency and no documentation completed Local ISP until 05/22/18. Corrected during survey. FOR THIS EMPLOYEE, IT IS ONLY NECESSARY TO ANSWER QUESTIONS 2-4. Employee #7: Start date: 10/18/17; SD: 10/11/17; Not: 10/13/17; FP: 11/30/17; cleared 01/23/18; printed 01/23/18. Clearance not completed within 21 days.</td>
<td>2. HI manager will review all remaining employee files and bring them to compliance to IDAPA 16.05.06 standards. 3. HI manager will make changes to New Employee Checklist to ensure compliance. 4. When new staff are hired, HI manager will use the administrator calendar to track timelines for compliance with this standard. 5. 6/15/2018</td>
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<td>1. Staff will not be allowed to work without clearance within 21 days. Any staff beginning employment prior to receiving clearance will have the 21st day tracked on the administrator calendar. If clearance is not received by the 21st day, the staff will be pulled from providing client services until they have been cleared by the Criminal History unit.</td>
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<td>16.03.21.410.01.b 410. GENERAL TRAINING REQUIREMENTS FOR DDA STAFF. Each DDA must ensure that all training of staff specific to service delivery to the participant is completed as follows: 01. Yearly Training. The DDA must ensure that staff or volunteers who provide DDA services complete a minimum of twelve (12) hours of formal training each calendar year. Each agency staff providing services</td>
<td>For 1 of 5 employee files reviewed, the employee had a one-month lapse in CPR and first aid certification. For example: Employee #2 Was certified through May 15, 2017 but not recertified until July 2017.</td>
<td>2. HI manager will review all remaining employee files and bring them to compliance to IDAPA 16.05.06 standards. 3. HI manager will make changes to New Employee Checklist to ensure compliance. 4. When new staff are hired, HI manager will use the administrator calendar to track timelines for compliance with this standard. 5. 6/15/2018</td>
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<td>16.03.21.410.01.b</td>
<td>1. HI Manager implemented a tracking and system for all CPR first aid and CPR certifications after the lapse occurred. The quality assurance program requires monthly monitoring of all certification renewal requirements by HI Manager. 2. HI manager will review all remaining employee files for compliance to IDAPA 16.03.21.410.01.b.</td>
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| to participants must: | For 1 of 5 employee files reviewed, there were several instances within the month of lapsed CPR/1st Aid where services were provided without being accompanied by someone with current CPR/1st Aid training: | 3. HI manager will implement corrective action.  
4. The quality assurance program requires monthly monitoring of all certification renewal requirements by HI Manager.  
5. 6/15/2018 | Click here to enter a date. |
| b. Be certified in CPR and first aid within ninety (90) days of hire and maintain current certification thereafter | For example: Employee #2 provided services in the community in the month of June 2017 without Current CPR and 1st Aid training without another staff who held current CPR and 1st Aid training with her and the participants being served. | 1. HI Manager implemented a tracking and system for all CPR first aid and CPR certifications after the lapse occurred. The quality assurance program requires monthly monitoring of all certification renewal requirements by HI Manager. If any staff certification lapses, that staff will not provide client services without the presence of another CBS staff who holds a current CPR/First Aid certification.  
2. HI manager will review all remaining employee files for compliance to IDAPA 16.03.21.410.01.b.  
3. HI manager will implement corrective action.  
4. The quality assurance program |

16.03.21.410.01.b.i  
410. GENERAL TRAINING REQUIREMENTS FOR DDA STAFF. Each DDA must ensure that all training of staff specific to service delivery to the participant is completed as follows:  
01. Yearly Training. The DDA must ensure that staff or volunteers who provide DDA services complete a minimum of twelve (12) hours of formal training each calendar year. Each agency staff providing services to participants must:  
   b. Be certified in CPR and first aid within ninety (90) days of hire and maintain current certification thereafter; and  
   i. The agency must ensure that CPR and first-aid trained staff are present or accompany participants when services or DDA-sponsored activities are being provided. |
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<td>16.03.21.410.01.b.ii 410. GENERAL TRAINING REQUIREMENTS FOR DDA STAFF. Each DDA must ensure that all training of staff specific to service delivery to the participant is completed as follows: 01. Yearly Training. The DDA must ensure that staff or volunteers who provide DDA services complete a minimum of twelve (12) hours of formal training each calendar year. Each agency staff providing services to participants must: b. Be certified in CPR and first aid within ninety (90) days of hire and maintain current certification thereafter; and ii. Each agency staff person must have age appropriate CPR and first aid certification for the participants he serves.</td>
<td>For 1 of 5 employee files reviewed, an employee did not have age appropriate CPR certification for the participants served. For example: Employee # 4’s CPR certification did not include training for pediatrics.</td>
<td>requires monthly monitoring of all certification renewal requirements by HI Manager. 5. 6/15/2018</td>
<td>6/15/2018</td>
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<td>1. HI Manager implemented a tracking and system for all CPR first aid and CPR certification. The quality assurance program requires monthly monitoring of all certification renewal requirements by HI Manager. The HI manager will ensure that any new staff who come with a CPR/First Aid certification have the appropriate certification for the participants served.</td>
<td>2. HI manager will review all remaining employee files for compliance to IDAPA 16.03.21.410.01.b. 3. HI manager will implement corrective action. 4. The quality assurance program requires monthly monitoring of all</td>
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### Rule Reference/Text | Findings | Agency’s Plan of Correction | Date to be Corrected (mm/dd/yyyy)
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- certification renewal requirements by HI Manager.
- 5. 6/15/18

**Agency Representative & Title:** Jennifer Queen, Director  
*By entering my name and title, I agree to implement this plan of correction as stated above.*

**Department Representative & Title:** Kimberly D. Cole, LSW  
*By entering my name and title, I approve of this plan of correction as it is written on the date identified.*

**Date Submitted:** 6/7/2018  
**Date Approved:** 6/8/2018