

**Westside Regional Center  
Home and Community-based Services Waiver  
Monitoring Review Report**

**Conducted by:**

**Department of Developmental Services  
and  
Department of Health Care Services**

**June 17 - 21, 2013**

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## EXECUTIVE SUMMARY

The Department of Developmental Services (DDS) and the Department of Health Care Services (DHCS) conducted the federal compliance monitoring review of the Home and Community-based Services (HCBS) Waiver from June 17-21, 2013, at Westside Regional Center (WRC). The monitoring team members were Mary Ann Smith (Team Leader), Kathy Benson, and Lisa Miller from DDS, and Annette Hanson and Raylyn Garrett from DHCS.

### Purpose of the Review

DDS contracts with 21 private, non-profit corporations to operate regional centers, which are responsible under state law for coordinating, providing, arranging or purchasing the services needed for eligible individuals with developmental disabilities in California. All HCBS Waiver services are provided through this system. It is the responsibility of DDS to ensure, with the oversight of DHCS, that the HCBS Waiver is implemented by regional centers in accordance with Medicaid statute and regulations.

### Overview of the HCBS Waiver Programmatic Compliance Monitoring Protocol

The compliance monitoring review protocol is comprised of sections/components designed to determine if the consumers' needs and program requirements are being met and that services are being provided in accordance with the consumers' individual program plans (IPPs). Specific criteria have been developed for the review sections listed below that are derived from federal/state statutes and regulations and from Centers for Medicare & Medicaid Services directives and guidelines relating to the provision of HCBS Waiver services.

### Scope of Review

The monitoring team reviewed a sample of 35 HCBS Waiver consumers. In addition, the following supplemental sample consumer records were reviewed: 1) three consumers who moved from a developmental center and 2) ten consumers who had special incidents reported to DDS during the review period of April 1, 2012 – March 31, 2013.

The monitoring team completed visits to two community care facilities (CCFs) and 10 day programs. The team reviewed two CCF and 10 day program consumer records and had face-to-face visits and/or interviews with 28 consumers or their parents.

## Overall Conclusion

WRC is in substantial compliance with the federal requirements for the HCBS Waiver program. Specific recommendations that require follow-up actions by WRC are included in the report findings. DDS is requesting documentation of follow-up actions taken by WRC in response to each of the specific recommendations within 30 days following receipt of this report.

## Major Findings

### Section I – Regional Center Self-Assessment

The self-assessment responses indicated that WRC has systems and procedures in place for implementing the state and HCBS Waiver requirements addressed in the self-assessment criteria.

### Section II – Regional Center Consumer Record Review

Thirty-five sample consumer records were reviewed for 31 documentation requirements (criteria) derived from federal and state statutes and regulations and HCBS Waiver requirements. One criterion was rated as not applicable for this review.

The sample records were 98% in overall compliance for this review. WRC's records were 98% in overall compliance for the collaborative reviews conducted in 2011 and in 2009.

### Section III – Community Care Facility Consumer (CCF) Record Review

Two consumer records were reviewed at two CCFs for 19 documentation requirements (criteria) derived from Title 17, California Code of Regulations. Three criteria were rated as not applicable for this review. The sample records were 100% in compliance for the 16 applicable criteria.

WRC's records were 100% in overall compliance for the collaborative reviews conducted in 2011 and in 2009.

### Section IV – Day Program Consumer Record Review

Ten consumer records were reviewed at 10 day programs for 17 documentation requirements (criteria) derived from Title 17, California Code of Regulations. The sample records were 98% in overall compliance for the 17 criteria. WRC's records were 97% and 100% in overall compliance for the collaborative reviews conducted in 2011 and in 2009, respectively.

## Section V – Consumer Observations and Interviews

Twenty-eight sample consumers, or in the case of minors, their parents were interviewed and/or observed at their CCFs, day programs, or in independent living settings. The monitoring team observed that all of the consumers were in good health and were treated with dignity and respect. The interviewed consumers/parents indicated that they were satisfied with their services, health and choices.

### Section VI A – Service Coordinator Interviews

Seven service coordinators were interviewed using a standard interview instrument. The service coordinators responded to questions regarding their knowledge of the consumer, the IPP/annual review process, the monitoring of services, health issues, and safety. The service coordinators were very familiar with the consumers and knowledgeable about their roles and responsibilities.

### Section VI B – Clinical Services Interview

The Director of Community Services was interviewed using a standard interview instrument. The director responded to informational questions regarding the monitoring of consumers with medical issues, medications, behavior plans, the coordination of medical and mental health care for consumers, the provision of clinical supports to service coordinators, and the clinical team's participation in the Risk Management and Mitigation Committee.

### Section VI C – Quality Assurance Interview

A provider relations specialist was interviewed using a standard interview instrument. She responded to informational questions regarding how WRC is organized to conduct Title 17 monitoring reviews, verification of provider qualifications, resource development activities, special incident reporting, and QA activities where there is no regulatory requirement.

### Section VII A – Service Provider Interviews

Two CCF and four day program service providers were interviewed using a standard interview instrument. The service providers responded to questions in the context of the sample consumers regarding their knowledge of the consumer, the annual review process and the monitoring of health issues, medications, progress, safety and emergency preparedness. The service providers were familiar with the consumers and knowledgeable about their roles and responsibilities.

### Section VII B – Direct Service Staff Interviews

Two CCF and three day program direct service staff were interviewed using a standard interview instrument. The direct service staff responded to questions regarding their knowledge of consumers, the IPP, communication, service delivery, procedures for safety, emergency preparedness, and medications. The staff were familiar with the consumers and knowledgeable about their roles and responsibilities.

### Section VIII – Vendor Standards Review

The monitoring team reviewed two CCFs and three day programs utilizing a standard checklist with 23 criteria that are consistent with HCBS Waiver requirements. All of the reviewed vendors were in good repair with no immediate health or safety concerns observed.

### Section IX – Special Incident Reporting

The monitoring team reviewed the records of the 35 HCBS Waiver consumers and ten supplemental sample consumers for special incidents during the review period. WRC reported all special incidents for the sample of 35 records selected for the HCBS Waiver review to DDS. For the supplemental sample, the service providers reported all ten incidents to WRC within the required timeframe and WRC subsequently transmitted all ten special incidents to DDS within the required timeframe. WRC's follow-up activities on consumer incidents were timely and appropriate for the severity of the situation.

## SECTION I

### REGIONAL CENTER SELF ASSESSMENT

#### I. Purpose

The regional center self-assessment addresses the California Home and Community-based Services (HCBS) Waiver assurances criteria and is designed to provide information about the regional center's processes and practices. The responses are used to verify that the regional center has processes in place to ensure compliance with federal and state laws and regulations.

The self-assessment obtains information about Westside Regional Center's (WRC) procedures and practices to verify that there are processes in place to ensure compliance with state and federal laws and regulations as well as the assurances contained in the HCBS Waiver application approved by the Centers for Medicare & Medicaid Services.

#### II. Scope of Assessment

WRC is asked to respond to questions in four categories that correspond to the HCBS Waiver assurances with which the regional center is responsible for complying. The questions are shown at the end of this section.

#### III. Results of Assessment

The self-assessment responses indicate that WRC has systems and procedures in place for implementing the state and HCBS Waiver requirements addressed in the self-assessment criteria.

✓ The full response to the self-assessment is available upon request.

<b>Regional Center Self-Assessment HCBS Waiver Assurances</b>	
HCBS Waiver Assurances	Regional Center Assurances
<p>State conducts level of care need determinations consistent with the need for institutionalization</p>	<p>The regional center ensures that consumers meet ICF/DD, ICF/DD-H, or ICF/DD-N facility level of care requirements as a condition of initial and annual eligibility for the HCBS Waiver Program.</p> <p>Regional center ensures that the regional center staff responsible for certifying and recertifying consumers' HCBS Waiver eligibility meet the federal definition of a Qualified Mental Retardation Professional (QMRP).</p> <p>The regional center ensures that consumers are eligible for full scope Medi-Cal benefits before enrolling them in the HCBS Waiver.</p>
<p>Necessary safeguards have been taken to protect the health and welfare of persons receiving HCBS Waiver Services</p>	<p>The regional center takes action(s) to ensure consumers' rights are protected.</p> <p>The regional center takes action(s) to ensure that the consumers' health needs are addressed.</p> <p>The regional center ensures that behavior plans preserve the right of the consumer to be free from harm.</p> <p>The regional center maintains a Risk Management, Risk Assessment and Planning Committee.</p> <p>The regional center has developed and implemented a Risk Management/Mitigation Plan.</p> <p>Regional centers and local Community Care Licensing offices coordinate and collaborate in addressing issues involving licensing requirements and monitoring of CCFs pursuant to the MOU between DDS and Department of Social Services.</p> <p>The regional center has developed and implemented a quality assurance plan for Service Level 2, 3 and 4 community care facilities.</p> <p>The regional center reviews each community care facility annually to assure services are consistent with the program design and applicable laws, and development and implementation of corrective action plans as needed.</p> <p>The regional center conducts not less than two unannounced monitoring visits to each CCF annually.</p> <p>Service coordinators perform and document periodic reviews [at least annually] to ascertain progress toward achieving IPP objectives, and the consumer's and the family's satisfaction with the IPP and its implementation.</p> <p>Service coordinators have quarterly face-to-face meetings with consumers in CCFs, Family Home Agencies, Supported Living Services, and Independent Living Services to review services and progress toward achieving the IPP objectives for which the service provider is responsible.</p>



<b>Regional Center Self-Assessment HCBS Waiver Assurances</b>	
<b>HCBS Waiver Assurances</b>	<b>Regional Center Assurances</b>
Necessary safeguards have been taken to protect the health and welfare of persons receiving HCBS Waiver Services (cont.)	The regional center ensures that needed services and supports are in place when a consumer moves from a developmental center (DC) to a community living arrangement. Service coordinators provide enhanced case management to consumers who move from a DC by meeting with them face-to-face every 30 days for the first 90 days they reside in the community.
Only qualified providers serve HCBS Waiver participants	The regional center ensures that all HCBS Waiver service providers have signed the "HCBS Provider Agreement Form" and meet the required qualifications at the time services are provided.
Plans of care are responsive to HCBS Waiver participant needs	The regional center ensures that all HCBS Waiver consumers are offered a choice between receiving services and living arrangements in an institutional or community setting. Regional centers ensure that planning for IPPs includes a comprehensive assessment and information gathering process which addresses the total needs of HCBS Waiver consumers and is completed at least every three years at the time of his/her triennial IPP. The IPPs of HCBS Waiver consumers are reviewed at least annually by the planning team and modified, as necessary, in response to the consumers' changing needs, wants and health status. The regional center uses feedback from consumers, families and legal representatives to improve system performance. The regional center documents the manner by which consumers indicate choice and consent.

## SECTION II

### REGIONAL CENTER CONSUMER RECORD REVIEW

#### I. Purpose

The review is based upon documentation criteria derived from federal/state statutes and regulations and from the Centers for Medicare & Medicaid Services directives and guidelines relating to the provision of Home and Community-based Services (HCBS) Waiver services. The criteria address requirements for eligibility, consumer choice, notification of proposed action (NOA) and fair hearing rights, level of care, individual program plans (IPPs) and periodic reviews and reevaluations of services. The information obtained about the consumers' needs and services is tracked as a part of the on-site program reviews.

#### II. Scope of Review

1. Thirty-five HCBS Waiver consumer records were selected for the review sample.

<b>Living Arrangement</b>	<b># of Consumers</b>
Community Care Facility (CCF)	6
With Family	14
Independent or Supported Living Setting	15

2. The review period covered activity from April 1, 2012 – March 31, 2013.

#### III. Results of Review

The 35 sample consumer records were reviewed for 31 documentation requirements derived from federal and state statutes and regulations and HCBS Waiver requirements. Three supplemental records were reviewed for documentation of face-to-face meetings no less than once every 30 days for the first 90 days following the consumer's move from a developmental center. One criterion was not applicable for this review.

- ✓ The sample records were in 100% compliance for 23 criteria. There are no recommendations for these criteria.
- ✓ Findings for seven criteria are detailed below.
- ✓ A summary of the results of the review is shown in the table at the end of this section.

#### IV. Findings and Recommendations

- 2.2 Each record contains a dated and signed Medicaid Waiver Consumer Choice of Services/Living Arrangements form, (DS 2200). (SMM 4442.7), (42 CFR 441.302(d))

##### Finding

Thirty-four of the 35 (97%) sample consumer records contained a dated and signed DS 2200 form. However, the DS 2200 form for consumer #11, an unconserved adult, was signed by the consumer’s mother.

2.2 Recommendation	Regional Center Plan/Response
WRC should ensure the DS 2200 form for consumer #11 is completed and signed by the consumer. If the consumer does not sign, WRC should ensure that the record addresses what actions were taken to encourage the consumer to sign and the reason why he did not sign.	The DS 2200 has now been signed by the consumer.  We have stressed the importance of documenting in an ID note the reason why the client was unable to sign and the attempts made to obtain the signature.

- 2.5.b The consumer’s qualifying conditions documented in the Client Development Evaluation Report (CDER) are consistent with information contained in the consumer’s record. (SMM 4442.5), (42 CFR 441.302(c)), (Title 22, CCR, §51343)

##### Findings

Thirty-three of the 35 (94%) sample consumer records documented level of care qualifying conditions that were consistent with information found elsewhere in the record. However, information contained in two consumer records (detailed below) did not support the determination that all of the issues identified in the CDER and DS 3770 could be considered qualifying conditions. The following were identified as qualifying conditions on the DS 3770 but there was no supporting information in the consumers’ records (IPP, progress reports, vendor reports, etc.) that described the impact of the identified conditions or need for services and supports.

1. Consumer #7: “Disruptive behavior”
2. Consumer #26: “Supervision to prevent injury and assistance with toileting”

2.5.b Recommendations	Regional Center Plan/Response
<p>WRC should determine if the items listed above are appropriately identified as qualifying conditions. The consumers' DS 3770 forms should be corrected to ensure that any items that do not represent substantial limitations in the consumers' ability to perform activities of daily living and/or participate in community activities are no longer identified as qualifying conditions. If WRC determines that the issues are correctly identified as qualifying conditions, documentation (updated IPPs, progress reports, etc.) that supports the original determinations should be submitted with the response to this report.</p>	<p>#7 "Disruptive behavior" has been deleted from client's CDER and 3770 (he has 5 additional deficits) – see attached copies).</p> <p>#26 "Supervision to prevent injury" &amp; "Assistance with toileting" have been deleted from client's CDER and 3770 (he has 4 additional deficits) – see attached copies.</p> <p>Training has been provided to SCs to reinforce the importance of accurate/matching recording of deficit information in the IPP and CDER.</p>

2.7.a The IPP is signed, prior to its implementation, by an authorized representative of the regional center and the consumer or, where appropriate, his/her parents, legal guardian, or conservator. (WIC §4646(g))

Findings

Thirty-three of the 35 (94%) sample consumer records contained IPPs that were signed by WRC and the consumers or their legal representatives. The IPP for consumer #9, a conserved adult, had been signed by the consumer. The conservator's signature was obtained during the review. Accordingly, no recommendation is required. The IPP for Consumer #11, an unconserved adult, was signed by the consumer's mother.

2.7.a Recommendation	Regional Center Plan/Response
<p>WRC should ensure that the IPP is signed by consumer #11. If the consumer does not sign, WRC should ensure that the record addresses what actions were taken to encourage the consumer to sign and/or the reason why he did not sign.</p>	<p>The IPP signature sheet has now been signed by the consumer.</p> <p>We have stressed the importance of documenting in an ID note the reason why the client was unable to sign and the attempts made to obtain the signature.</p>

2.10.a The IPP includes a schedule of the type and amount of all services and supports purchased by the regional center. (WIC §4646.5(a)(4))

Findings

Thirty-one of the 35 (89%) sample consumer IPPs included a schedule of the type and amount of all services and supports purchased by WRC. However, the IPPs for four consumers did not indicate WRC funded services as indicated below:

1. Consumer #7: Socialization training
2. Consumers #10 and #16: Dentistry
3. Consumer #21: Transportation

2.10.a Recommendations	Regional Center Plan/Response
WRC should ensure that the IPPs for consumers #7, #10, #16, and #21 include a schedule of the type and amount of all services and supports purchased by WRC.	Addendums and IPP corrections have been made to each case – see attached copies. Training has been provided to reinforce the importance of listing all WRC funded services in the IPP.

2.11 The IPP identifies the provider or providers of service responsible for implementing services. (WIC § 4646.5(a)(4))

Finding

Thirty-four of the 35 (97%) of the records identified the provider or providers responsible for implementing services. However, the record for consumer #31 did not identify the provider for behavior management.

2.11 Recommendation	Regional Center Plan/Response
WRC should ensure that the IPP for consumer #31 identifies the provider responsible for behavior management services.	An addendum has been completed to identify the provider of behavior management services – see attached copy. Training has been provided to reinforce the importance of identifying all service providers in the IPP.

2.13.a Quarterly face-to-face meetings are completed for consumers living in community out-of-home settings, i.e., Service Level 2, 3 or 4 community care facilities, family home agencies or supported living and independent living settings. (Title 17,

CCR, §56047), (Title 17, CCR, §56095), (Title 17, CCR, §58680), (Contract requirement)

Findings

Seventeen of the 21 (81%) applicable sample consumer records had quarterly face-to-face meetings completed and documented. However, the records for four consumers did not meet the requirements as indicated below:

1. The records for consumers #13, #15, and #18 contained documentation of three of the required meetings.
2. The record for consumer #17 contained documentation of one of the required meetings.

2.13.a Recommendations	Regional Center Plan/Response
WRC should ensure that future face-to-face meetings are completed and documented each quarter for consumers #13, #15, #17, and #18.	The importance of face-to face quarterly meetings has been stressed and reinforced. On-going training will be provided in this area.

2.13.b Quarterly reports of progress are completed for consumers living in community out-of-home settings, i.e., Service Level 2, 3 or 4 community care facilities, family home agencies or supported living and independent living settings. (Title 17, CCR, §56047), (Title 17, CCR, §56095), (Title 17, CCR, §58680), (Contract requirement)

Findings

Eighteen of the 21 (86%) applicable sample consumer records had quarterly reports of progress completed and documented. However, the records for three consumers did not meet the requirements as indicated below:

1. The records for consumers #13 and #18 contained documentation of three quarterly reports of progress.
2. The record for consumer #17 contained documentation of one of the required quarterly reports of progress.

2.13.b Recommendations	Regional Center Plan/Response
WRC should ensure that future reports of progress are completed each quarter for consumers #13, #17	The importance of completing quarterly progress reports has been stressed and reinforced. On-going training will be

and #18.	provided in this area.
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<b>Regional Center Consumer Record Review Summary</b>						
<b>Sample Size = 35 + 6 Supplemental Records</b>						
	<b>Criteria</b>	<b>+</b>	<b>-</b>	<b>N/A</b>	<b>% Met</b>	<b>Follow-up</b>
2.0	The consumer is Medi-Cal eligible. (SMM 4442.1)	35			100	None
2.1	Each record contains a Medicaid Waiver Eligibility Record (DS 3770), signed by a Qualified Mental Retardation Professional (QMRP), which documents the date of the consumer's initial HCBS Waiver eligibility certification, annual recertifications, the consumer's qualifying conditions and short-term absences. (SMM 4442.1), (42 CFR 483.430(a))	Criterion 2.1 consists of four sub-criteria (2.1a-d) that are reviewed and rated independently.				
2.1.a	The DS 3770 is signed by a Qualified Mental Retardation Professional and the title "QMRP" appears after the person's signature.	35			100	None
2.1.b	The DS 3770 form identifies the consumer's qualifying conditions and any applicable special health care requirements for meeting the Title 22 level of care requirements.	35			100	None
2.1.c	The DS 3770 form documents annual re-certifications.	34			100	None
2.1.d	The DS 3770 documents short-term absences of 120 days or less, if applicable.	1		34	100	None
2.2	Each record contains a dated and signed Medicaid Waiver Consumer Choice of Services/Living Arrangements form, (DS 2200). (SMM 4442.7), (42 CFR 441.302(d))	34	1		97	See Narrative
2.3	There is a written notification of a proposed action and documentation that the consumer has been sent written notice of their fair hearing rights whenever choice of living arrangements is not offered, services or choice of services are denied, the consumer/parent/legal guardian or legal representative does not agree with all, or part of the components in the consumer's IPP, or the consumer's HCBS Waiver eligibility has been terminated. (SMM 4442.7), (42 CFR Part 431, Subpart E), (WIC §4646(g))	3		35	100	None



<b>Regional Center Consumer Record Review Summary</b>						
<b>Sample Size = 35 + 6 Supplemental Records</b>						
	<b>Criteria</b>	<b>+</b>	<b>-</b>	<b>N/A</b>	<b>% Met</b>	<b>Follow-up</b>
2.4	Each record contains a current Client Development Evaluation Report (CDER) that has been reviewed within the last 12 months. ( <i>SMM 4442.5</i> ), ( <i>42 CFR 441.302</i> )	35			100	None
2.5.a	The consumer's qualifying conditions and any special health care requirements used to meet the level of care requirements for care provided in an ICF-DD, ICF-DDH, and ICF/DD-N facility are documented in the consumer's CDER and other assessments. ( <i>SMM 4442.5</i> ), ( <i>42 CFR 441.302(c)</i> ), ( <i>Title 22, CCR, §51343</i> )	35			100	None
2.5.b	The consumer's qualifying conditions documented in the CDER are consistent with information contained in the consumer's record.	33	2		94	See Narrative
2.6.a	IPP is reviewed ( <i>at least annually</i> ) by the planning team and modified as necessary, in response to the consumer's changing needs, wants or health status. ( <i>42 CFR 441.301(b)(1)(I)</i> )	35			100	None
2.6.b	The HCBS Waiver Standardized Annual Review Form is completed and signed annually by the planning team to document whether or not a change to the existing IPP is necessary, and health status and CDER have been reviewed. ( <i>HCBS Waiver requirement</i> )			35	N/A	None
2.7.a	The IPP is signed, prior to its implementation, by an authorized representative of the regional center and the consumer, or where appropriate, his/her parents or legal guardian or conservator. ( <i>WIC §4646(g)</i> )	33	2		94	See Narrative
2.7.b	IPP addenda are signed by an authorized representative of the regional center and the consumer, or where appropriate, his/her parents, legal guardian, or conservator.	4		31	100	None
2.7.c	The IPP is prepared jointly with the planning team. ( <i>WIC §4646(d)</i> )	35			100	None
2.8	The IPP includes a statement of goals based on the needs, preferences and life choices of the consumer. ( <i>WIC §4646.5(a)</i> )	35			100	None

<b>Regional Center Consumer Record Review Summary</b>						
<b>Sample Size = 35 + 6 Supplemental Records</b>						
	<b>Criteria</b>	<b>+</b>	<b>-</b>	<b>N/A</b>	<b>% Met</b>	<b>Follow-up</b>
2.9	The IPP addresses the consumer's goals and needs. (WIC §4646.5(a)(2))	Criterion 2.9 consists of seven sub-criteria (2.9 a-g) that are reviewed independently				
2.9.a	The IPP addresses the qualifying conditions identified in the CDER and Medicaid Waiver Eligibility Record (DS 3770).	35			100	None
2.9.b	The IPP addresses the special health care requirements.	9		26	100	None
2.9.c	The IPP addresses the services for which the CCF provider is responsible for implementing.	6		29	100	None
2.9.d	The IPP addresses the services for which the day program provider is responsible for implementing.	18		17	100	None
2.9.e	The IPP addresses the services for which the supported living services agency or independent living services provider is responsible for implementing.	15		20	100	None
2.9.f	The IPP addresses the consumer's goals, preferences and life choices.	35			100	None
2.9.g	The IPP includes a family plan component if the consumer is a minor. (WIC §4685(c)(2))	8		27	100	None
2.10.a	The IPP includes a schedule of the type and amount of all services and supports purchased by the regional center. (WIC §4646.5(a)(4))	31	4		89	See Narrative
2.10.b	The IPP includes a schedule of the type and amount of all services and supports obtained from generic agencies or other resources. (WIC §4646.5(a)(4))	35			100	None
2.10.c	The IPP specifies the approximate scheduled start date for the new services. (WIC §4646.5(a)(4))	4		31	100	None
2.11	The IPP identifies the provider or providers of service responsible for implementing services, including, but not limited to vendors, contract providers, generic service agencies and natural supports. (WIC §4646.5(a)(4))	34	1		97	See Narrative

<b>Regional Center Consumer Record Review Summary</b>						
<b>Sample Size = 35 + 6 Supplemental Records</b>						
	<b>Criteria</b>	<b>+</b>	<b>-</b>	<b>N/A</b>	<b>% Met</b>	<b>Follow-up</b>
2.12	Periodic review and reevaluations of consumer progress are completed ( <i>at least annually</i> ) to ascertain that planned services have been provided, that consumer progress has been achieved within the time specified, and the consumer and his/her family are satisfied with the IPP and its implementation. ( <i>WIC §4646.5(a)(6)</i> )	35			100	None
2.13.a	Quarterly face-to-face meetings are completed for consumers living in community out-of-home settings, i.e., Service Level 2, 3 or 4 community care facilities, family home agencies or supported living and independent living settings. ( <i>Title 17, CCR, §56047</i> ), ( <i>Title 17, CCR, §56095</i> ), ( <i>Title 17, CCR, §58680</i> ), ( <i>Contract requirement</i> )	17	4	14	81	See Narrative
2.13.b	Quarterly reports of progress are completed for consumers living in community out-of-home settings, i.e., Service Level 2, 3 or 4 community care facilities, family home agencies or supported living and independent living settings. ( <i>Title 17, CCR, §56047</i> ), ( <i>Title 17, CCR, §56095</i> ), ( <i>Title 17, CCR, §58680</i> ), ( <i>Contract requirement</i> )	18	3	14	86	See Narrative
2.14	Face-to-face reviews are completed no less than once every 30 days for the first 90 days following the consumer's move from a developmental center to a community living arrangement. ( <i>WIC §4418.3</i> )	3		35	100	None

## SECTION III

### COMMUNITY CARE FACILITY CONSUMER RECORD REVIEW

#### I. Purpose

The review addresses the requirements for community care facilities (CCFs) to maintain consumer records and prepare written reports of consumer progress in relation to the services addressed in the individual program plan (IPP) for which the facility is responsible. The criteria are derived from Title 17, California Code of Regulations.

#### II. Scope of Review

Two consumer records were reviewed at two CCFs visited by the monitoring team. The facilities' consumer records were reviewed to determine compliance with 19 criteria.

#### III. Results of Review

The consumer records were 100% in compliance for 16 criteria. Three criteria were not applicable for this review.

- ✓ A summary of the results of the review is shown in the table at the end of this section.

<b>Community Care Facility Record Review Summary</b>						
<b>Sample Size: Consumers = 2; CCFs = 2</b>						
	<b>Criteria</b>	<b>+</b>	<b>-</b>	<b>N/A</b>	<b>% Met</b>	<b>Follow-up</b>
3.1	An individual consumer file is maintained by the CCF that includes the documents and information specified in Title 17 and Title 22. <i>(Title 17, CCR, §56017(b)), (Title 17, CCR §56059(b)), (Title 22, CCR, §80069)</i>	2			100	None
3.1.a	The consumer record contains a statement of ambulatory or non ambulatory status.	2			100	None
3.1.b	The consumer record contains known information related to any history of aggressive or dangerous behavior toward self or others.	2			100	None
3.1.c	The consumer record contains current health information that includes medical, dental and other health needs of the consumer including annual visit dates, physicians' orders, medications, allergies, and other relevant information.	2			100	None
3.1.d	The consumer record contains current emergency information: family, physician, pharmacy, etc.	2			100	None
3.1.e	The consumer record contains a recent photograph and a physical description of the consumer.	2			100	None
3.1.i	Special safety and behavior needs are addressed.	2			100	None
3.2	The consumer record contains a written admission agreement completed for the consumer that includes the certifying statements specified in Title 17, and is signed by the consumer or his/her authorized representative, the regional center and the facility administrator. <i>(Title 17, CCR, §56019(c)(1))</i>	2			100	None
3.3	The facility has a copy of the consumer's current IPP. <i>(Title 17, CCR, §56022(c))</i>	2			100	None

<b>Community Care Facility Record Review Summary</b>						
<b>Sample Size: Consumers = 2; CCFs = 2</b>						
	<b>Criteria</b>	<b>+</b>	<b>-</b>	<b>N/A</b>	<b>% Met</b>	<b>Follow-up</b>
3.4.a	Service Level 2 and 3 facilities prepare and maintain written semiannual reports of consumer progress. ( <i>Title 17, CCR, §56026(b)</i> )	1		1	100	None
3.4.b	Semiannual reports address and confirm the consumer's progress toward achieving each of the IPP objectives for which the facility is responsible.	1		1	100	None
3.5.a	Service Level 4 facilities prepare and maintain written quarterly reports of consumer progress. ( <i>Title 17, CCR, §56026(c)</i> )			2	100	None
3.5.b	Quarterly reports address and confirm the consumer's progress toward achieving each of the IPP objectives for which the facility is responsible.			2	100	None
3.5.c	Quarterly reports include a summary of data collected. ( <i>Title 17, CCR, §56013(d)(4)</i> ), ( <i>Title 17, CCR, §56026</i> )			2	100	None
3.6.a	The facility prepares and maintains ongoing, written consumer notes, as required by Title 17. ( <i>Title 17, CCR §56026(a)</i> )	2			100	None
3.6.b	The ongoing notes/information verifies that behavior needs are being addressed.	2			100	None
3.7.a	Special incidents are reported to the regional center within 24 hours after learning of the occurrence of the special incident. ( <i>Title 17, CCR, §54327</i> )			2	100	None
3.7.b	A written report of the special incident is submitted to the regional center within 48 hours after the occurrence of the special incident. ( <i>Title 17, CCR, §54327</i> )			2	100	None
3.7.c	Follow-up activities were undertaken to prevent, reduce or mitigate future danger to the consumer. ( <i>Title 17, CCR, §54327</i> )			2	100	None

## SECTION IV

### DAY PROGRAM CONSUMER RECORD REVIEW

#### I. Purpose

The review criteria address the requirements for day programs (DP) to maintain consumer records and prepare written reports of consumer progress in relation to the services addressed in the individual program plan (IPP) that the day program provider is responsible for implementing. The criteria are derived from Title 17, California Code of Regulations.

#### II. Scope of Review

Ten consumer records were reviewed at ten day programs visited by the monitoring team. The records were reviewed to determine compliance with 17 criteria.

#### III. Results of Review

The consumer records were 100% in compliance for 15 of the 17 criteria.

- ✓ A summary of the results of the review is shown in the table at the end of this section.
- ✓ Findings for two criteria are detailed below.

#### IV. Findings and Recommendations

##### 4.2 The day program has a copy of the consumer's current IPP. (Title 17, CCR, § 56720)(b))

##### Findings

Eight of the ten (80%) sample consumer records contained a copy of the consumer's current IPP. However, the records for consumer #11 at DP #4 and consumer #25 at DP #9 did not contain copies of the current IPPs. The IPP for consumer #25 was provided to DP #9 at the time of the review. Accordingly no recommendation is required

4.2 Recommendations	Regional Center Plan/Response
WRC should ensure that day program provider #4 receives a current copy of the IPP for consumer #11.	A copy of the consumer #11's IPP has been sent to provider #4. Training has been provided to reinforce the importance of sending a copy of client's

	IPP to all WRC funded service providers.
--	--

4.4.a The day program prepares and maintains written semiannual reports of the consumer's performance and progress. (*Title 17, CCR, § 56720(c)*)

Finding

Nine of the 10 (90%) applicable consumer records contained written semiannual reports of consumer progress. However, the record for consumer #14 at DP #1 only contained one of the required progress reports in the monitoring review period.

4.4.a Recommendation	Regional Center Plan/Response
WRC should ensure that day program provider #1 prepares written semiannual reports of consumer progress.	WRC Day Services QA staff instructed DP #1 to provide semi-annual report for Client #14. WRC Day Services QA provided technical assistance to all day programs regarding their responsibilities to provide semi-annual reports during the Semi-Annual Day Program Training on September 23, 2016.



<b>Day Program Record Review Summary</b>						
<b>Sample Size: Consumers = 10; Day Programs = 10</b>						
	<b>Criteria</b>	<b>+</b>	<b>-</b>	<b>N/A</b>	<b>% Met</b>	<b>Follow-up</b>
4.1	An individual consumer file is maintained by the day program that includes the documents and information specified in Title 17. (Title 17, CCR, §56730)	10			100	None
4.1.a	The consumer record contains current emergency and personal identification information including the consumer's address, telephone number, names and telephone numbers of residential care provider, relatives, and/or guardian or conservator, physician name(s) and telephone number(s), pharmacy name, address and telephone number and health plan, if appropriate.	10			100	None
4.1.b	The consumer record contains current health information that includes current medications, known allergies, medical disabilities, infectious, contagious, or communicable conditions, special nutritional needs, and immunization records.	10			100	None
4.1.c	The consumer record contains any medical, psychological, and social evaluations identifying the consumer's abilities and functioning level, provided by the regional center.	10			100	None
4.1.d	The consumer record contains an authorization for emergency medical treatment signed by the consumer and/or the authorized consumer representative.	10			100	None
4.1.e	The consumer record contains documentation that the consumer and/or the authorized consumer representative has been informed of his/her personal rights.	10			100	None
4.1.f	Data is collected that measures consumer progress in relation to the services addressed in the IPP for which the day program provider is responsible for implementing.	10			100	None

<b>Day Program Record Review Summary</b>						
<b>Sample Size: Consumers = 10; Day Programs = 10</b>						
	<b>Criteria</b>	<b>+</b>	<b>-</b>	<b>N/A</b>	<b>% Met</b>	<b>Follow-up</b>
4.1.g	The consumer record contains up-to-date case notes reflecting important events or information not documented elsewhere.	10			100	None
4.1.h	The consumer record contains documentation that special safety and behavior needs are being addressed.	10			100	None
4.2	The day program has a copy of the consumer's current IPP. ( <i>Title 17, CCR §56720(b)</i> )	8	2		80	See Narrative
4.3.a	The day program provider develops, maintains, and modifies as necessary, documentation regarding the manner in which it implements the services addressed in the IPP. ( <i>Title 17, CCR, §56720(a)</i> )	10			100	None
4.3.b	The day program's ISP or other program documentation is consistent with the services addressed in the consumer's IPP.	10			100	None
4.4.a	The day program prepares and maintains written semiannual reports. ( <i>Title 17, CCR, §56720(c)</i> )	9	1		90	See Narrative
4.4.b	Semiannual reports address the consumer's performance and progress relating to the services for which the day program is responsible for implementing.	10			100	None
4.5.a	Special incidents are reported to the regional center within 24 hours after learning of the occurrence of the special incident. ( <i>Title 17, CCR, §54327</i> )	1		9	100	None
4.5.b	A written report of the special incident is submitted to the regional center within 48 hours after the occurrence of the special incident. ( <i>Title 17, CCR, §54327</i> )	1		9	100	None
4.5.c	There is appropriate follow-up to special incidents to resolve the issue and eliminate or mitigate future risk. ( <i>Title 17, CCR, §54327</i> )	1		9	100	None

## SECTION V

### CONSUMER OBSERVATIONS AND INTERVIEWS

#### I. Purpose

The consumer observations are conducted to verify that the consumers appear to be healthy and have good hygiene. Interview questions focus on the consumers' satisfaction with their living situation, day program and work activities, health, choice, and regional center services.

#### II. Scope of Observations and Interviews

Twenty-eight of the 35 consumers were interviewed and/or observed at their day programs, employment sites, community care facilities (CCFs), or in independent living settings.

- ✓ Seventeen consumers agreed to be interviewed by the monitoring teams
- ✓ Five consumers did not communicate verbally or declined an interview, but were observed
- ✓ Six interviews were conducted with parents of minors
- ✓ Seven consumers/parents of minors were unavailable for or declined interviews

#### III. Results of Observations and Interviews

All consumers and parents of minors interviewed indicated satisfaction with their living situation, day program, work activities, health, choices, and regional center services. The consumers' overall appearance reflected personal choice and individual style.

## SECTION VI A

### SERVICE COORDINATOR INTERVIEWS

#### I. Purpose

The interviews determine how well the service coordinators know their consumers, the extent of their participation in the IPP/annual review process, and how they monitor services, health and safety issues.

#### II. Scope of Interviews

1. The monitoring team interviewed seven Westside Regional Center (WRC) service coordinators.
2. The interview questions are divided into two categories.
  - ✓ The questions in the first category are related to the consumers selected by the monitoring team.
  - ✓ The questions in the second category are related to general areas.

#### III. Results of Interviews

1. The service coordinators were very familiar with their respective consumers. They were able to relate specific details regarding the consumers' desires, preferences, life circumstances and service needs.
2. The service coordinators were knowledgeable about the IPP/annual review process and monitoring requirements. Service providers and family members provided input on the consumers' needs, preferences and satisfaction with services outlined in the IPP. For consumers in out-of-home placement settings, service coordinators conduct quarterly face-to-face visits and develop written assessments of consumer progress and satisfaction. In preparation for the quarterly visits, service coordinators review their previous progress reports, pertinent case notes, special incident reports, and vendor reports of progress.
3. To better understand issues related to consumers' use of medication and issues related to side-effects, the service coordinators utilize WRC's clinical team and internet medication guides as resources.
4. The service coordinators monitor the consumers' services, health and safety during periodic visits. They are aware of the consumers' health issues. The service coordinators were knowledgeable about the special incident report (SIR) process and work with the vendors to ensure all special incidents are reported and appropriate follow-up activities are completed.

## SECTION VI B

### CLINICAL SERVICES INTERVIEW

#### I. Purpose

The clinical services interview is used to obtain supplemental information on how the regional center is organized to provide clinical support to consumers and service coordinators. This interview aids in determining what measures the regional center is utilizing to ensure the ongoing health and safety of all Home and Community-based Services Waiver consumers.

#### II. Scope of Interview

1. The monitoring team interviewed Westside Regional Center's (WRC) Director of Clinical Services.
2. The questions in the interview cover the following topics: routine monitoring of consumers with medical issues, medications; behavior plans; coordination of medical and mental health care for consumers; circumstances under which actions are initiated for medical or behavior issues; clinical supports to assist service coordinators; improved access to preventive health care resources; and role in Risk Management Assessment and Planning Committee and special incident reports.

#### III. Results of Interview

The WRC clinical team includes physicians, a pediatric neurologist, clinical psychologists, a psychiatric consultant, a behavioral/autism specialist, registered nurses, an occupational therapist, a physical therapist, a speech therapist, a nutritionist, a dental coordinator, a pharmacy consultant and a wellness coordinator.

The clinical team nurses and physicians provide support in the management of clients with health care issues. Nurses are available to assist with hospital discharge planning. The team also provides a variety of training and education to staff, consumers, families and providers. Recent topics have included seizures, stress reduction, neurological, psychiatric and mental health conditions.

The clinical team participates in monitoring consumers' medications. The physician and nurse may review consumers who are prescribed multiple medications and contact their primary physician if needed. The WRC pharmacist and nurses are also available to provide additional medication monitoring and training to residential providers.

The clinical team is involved with consumers' behavioral plans and mental health issues. The clinical staff reviews behavior plans and makes recommendations as needed. Clinical staff also meets routinely to discuss behavioral issues.

When appropriate, on-site visits are made to observe implementation of the behavior plans.

WRC has relationships with UCLA and Kaiser Hospital to perform dental procedures at these facilities. The dental coordinator performs dental screenings and provides education and training to providers.

WRC has improved access to healthcare resources through the following programs:

- ✓ Relationship with Venice Family Clinic to provide primary and preventative healthcare
- ✓ Wellness grants and special projects are used to monitor consumers with health care needs such as obesity, stress reduction, dual diagnosis and mental health issues
- ✓ On-going weight and exercise program at WRC
- ✓ Support group for abused women
- ✓ Crisis support team
- ✓ Mobility equipment clinic at WRC
- ✓ Vision and hearing screening done with Early Start assessment
- ✓ Collaboration with the Neuropsychiatric Institute at University of California Los Angeles
- ✓ Internship with University of Southern California MSW students
- ✓ Internship with Mount Saint Mary's nursing students
- ✓ Collaboration with Achievable to provide medical and mental health services

The clinical team has an active role in risk management at the regional center. Medically related special incident reports are referred to the team for review and follow-up as indicated. A clinical team physician reviews all deaths and participates on the morbidity and mortality review committee. The committee uses SIR trend analysis to provide training to regional center staff and providers. Recent topics have included medications, choking and signs and symptom training.

## SECTION VI C

### QUALITY ASSURANCE INTERVIEW

#### I. Purpose

The informational interview with quality assurance (QA) staff ascertains how the regional center has organized itself to conduct Title 17 monitoring of community care facilities (CCFs), two unannounced visits to CCFs, service provider training, verification of provider qualifications, resource development activities, and quality assurance among programs and providers where there is no regulatory requirement to conduct quality assurance monitoring.

#### II. Scope of Interview

The monitoring team interviewed a quality assurance/resource developer specialist who is part of the team responsible for conducting Westside Regional Center's (WRC) QA activities.

#### III. Results of Interview

1. The interviewed staff provided specific information about WRC's process for conducting annual Title 17 reviews, unannounced visits and provider training. The [annual Title 17 visits](#) are completed by provider relations specialist, or selected staff. Title 17 visits include a comprehensive review of the home, client record review, and other items on a checklist. A service coordinator (facility liaison) assigned to the home does the two unannounced visits. When issues of substantial inadequacies are identified, a form is completed and sent to the quality assurance specialist. The QA specialist investigates to determine whether a Corrective Action Plan (CAP) will be issued and will conduct the follow up with the assistance of facility liaisons to ensure providers complete the corrective action plan (CAP) requirements.
2. The risk management and mitigation coordinator reviews all special incident reports (SIRs) and ensures effective follow-up on an individual and systemic basis. The coordinator develops trend analysis reports for the Risk Management and Mitigation Committee. The committee reviews these reports and trends on a bi-monthly basis. These trends are then provided to all program managers and quality assurance managers to share with case management staff.
3. The information obtained from QA activities is compiled and analyzed for trends of related issues that need to be addressed with training and/or referrals to appropriate consultants. Case management staff and QA staff meet monthly to discuss trends and develop appropriate vendor training. They also meet on a quarterly basis with Community Care Licensing. All vendors are encouraged to attend trainings.

4. The resource development committee reviews and recommends for approval vendor applications for CCF's, independent living services, supported living services, and day programs. Staff also monitor day programs and provide support of other vendored providers periodically.



## SECTION VII A

### SERVICE PROVIDER INTERVIEWS

#### I. Purpose

The interviews determine how well the service provider knows the consumers, the extent of their assessment process for the annual IPP development and/or review, the extent of their plan participation, how the plan was developed, how service providers ensure accurate documentation, communicate, address and monitor health issues, their preparedness for emergencies, how they monitor safety and safeguard medications.

#### II. Scope of Interviews

1. The monitoring team interviewed six service providers at two community care facilities (CCFs) and four day programs where services are provided to the consumers that were visited by the monitoring team.
2. The interview questions are divided into two categories.
  - ✓ The questions in the first category are related to sample consumers selected by the monitoring team.
  - ✓ The questions in the second category are related to general areas.

#### III. Results of Interviews

1. The service providers were familiar with the strengths, needs and preferences of their respective consumers.
2. The service providers indicated that they conducted assessments of the consumers, participated in their IPP development, provided the program specific services addressed in the IPPs and attempted to foster the progress of consumers.
3. The service providers monitored consumer health issues and safeguarded medications.
4. The service providers communicated with people involved in the consumers' lives and monitored progress documentation.
5. The service providers were prepared for emergencies, monitored the safety of consumers, and understood special incident reporting and follow-up processes.

## SECTION VII B

### DIRECT SERVICE STAFF INTERVIEWS

#### I. Purpose

The interviews determine how well the direct service staff knows the consumers and their understanding of the IPP and service delivery requirements, how they communicate, and their level of preparedness to address safety issues, their understanding of emergency preparedness, and knowledge about safeguarding medications.

#### II. Scope of Interviews

1. The monitoring team interviewed five direct service staff at two community care facilities (CCF) and three day programs where services are provided to the consumers that were visited by the monitoring team.
2. The interview questions are divided into two categories.
  - ✓ The questions in the first category are related to sample consumers selected by the monitoring team.
  - ✓ The questions in the second category are related to general areas.

#### III. Results of Interviews

1. The direct service staff were familiar with the strengths, needs and preferences of their respective consumers.
2. The direct service staff were knowledgeable about their roles and responsibilities for providing the services addressed in the consumers' IPPs.
3. The direct service staff demonstrated that they understood the importance of communication with all individuals concerned with the consumers.
4. The direct service staff were prepared to address safety issues and emergencies, and were familiar with special incident reporting requirements.
5. The direct service staff demonstrated an understanding about emergency preparedness.
6. The direct service staff were knowledgeable regarding safeguarding and assisting with self-administration of medications where applicable.

## SECTION VIII

### VENDOR STANDARDS REVIEW

#### I. Purpose

The review ensures that the selected community care facilities (CCFs) and day programs are serving consumers in a safe, healthy and positive environment where their rights are respected.

#### II. Scope of Review

1. The monitoring teams reviewed a total of two CCFs and three day programs.
2. The teams used a monitoring review checklist consisting of 23 criteria. The review criteria are used to assess the physical environment, health and safety, medications, services and staff, consumers' rights, and the handling of consumers' money.

#### III. Results of Review

All of the CCFs and the day programs were found to be in good condition with no immediate health and safety concerns. Specific findings and recommendations are detailed below.

#### IV. Finding and Recommendation

##### 8.3.c First Aid

##### Finding

DP #8 had five direct care staff that did not have first aid certificates.

8.3.c Recommendation	Regional Center Plan/Response
WRC should ensure that the provider at DP #8 has first aid certificates for all staff.	<b>WRC QA Staff instructed DP #8 to obtain first aid certificates for all staff within 30 days.</b>

## SECTION IX

### SPECIAL INCIDENT REPORTING

#### I. Purpose

The review verifies that special incidents have been reported within the required timeframes, that documentation meets the requirements of Title 17, California Code of Regulations, and that the follow-up was complete.

#### II. Scope of Review

1. Special incident reporting of deaths by the Westside Regional Center (WRC) was reviewed by comparing deaths entered into the Client Master File for the review period with special incident reports (SIRs) of deaths received by the Department of Developmental Services (DDS).
2. The records of the 35 consumers selected for the Home and Community-based Services (HCBS) Waiver sample were reviewed to determine that all required special incidents were reported to DDS during the review period.
3. A supplemental sample of ten consumers who had special incidents reported to DDS within the review period was assessed for timeliness of reporting and documentation of follow-up activities. The follow-up activities were assessed for being timely, appropriate to the situation, and resulting in an outcome that ensures the consumer is protected from adverse consequences, and that risks are either minimized or eliminated.

#### III. Results of Review

1. WRC reported all deaths during the review period to DDS.
2. WRC reported all special incidents in the sample of 35 records selected for the HCBS Waiver review to DDS.
3. WRC's vendors reported all ten (100%) incidents in the supplemental sample within the required timeframes.
4. WRC reported all ten (100%) incidents to DDS within the required timeframes.
5. WRC's follow-up activities on consumer incidents were appropriate for the severity of the situations for the ten incidents.

#### IV. Findings and Recommendations

None

## SAMPLE CONSUMERS AND SERVICE PROVIDERS/VENDORS

### HCBS Waiver Review Consumers

#	UCI	CCF	DP
1	XXXXXXXX		
2	XXXXXXXX	1	
3	XXXXXXXX		
4	XXXXXXXX		7
5	XXXXXXXX	2	
6	XXXXXXXX		2
7	XXXXXXXX		6
8	XXXXXXXX		
9	XXXXXXXX		
10	XXXXXXXX		
11	XXXXXXXX		4
12	XXXXXXXX		
13	XXXXXXXX		
14	XXXXXXXX		1
15	XXXXXXXX		
16	XXXXXXXX		
17	XXXXXXXX		
18	XXXXXXXX		
19	XXXXXXXX		
20	XXXXXXXX		12
21	XXXXXXXX		8
22	XXXXXXXX		
23	XXXXXXXX		
24	XXXXXXXX		
25	XXXXXXXX		9
26	XXXXXXXX		3
27	XXXXXXXX		10
28	XXXXXXXX		
29	XXXXXXXX		
30	XXXXXXXX		
31	XXXXXXXX		
32	XXXXXXXX		
33	XXXXXXXX		
34	XXXXXXXX		
35	XXXXXXXX		

### Consumers Developmental Center Movers

#	UCI
36	XXXXXXXX
37	XXXXXXXX
38	XXXXXXXX

### Terminations

#	UCI
60	XXXXXXXX
61	XXXXXXXX
62	XXXXXXXX

### HCBS Waiver Review Service Providers

CCF #	Vendor
1	XXXXXXXX
2	XXXXXXXX

Day Program #	Vendor
1	XXXXXXXX
2	XXXXXXXX
3	XXXXXXXX
4	XXXXXXXX
5	XXXXXXXX
6	XXXXXXXX
7	XXXXXXXX
8	XXXXXXXX
9	XXXXXXXX
10	XXXXXXXX
11	XXXXXXXX
12	XXXXXXXX

### SIR Review Consumers

#	UCI	Vendor
40	XXXXXXXX	XXXXXXXX
41	XXXXXXXX	XXXXXXXX
42	XXXXXXXX	XXXXXXXX
43	XXXXXXXX	XXXXXXXX
44	XXXXXXXX	XXXXXXXX
45	XXXXXXXX	XXXXXXXX
46	XXXXXXXX	XXXXXXXX
47	XXXXXXXX	XXXXXXXX
48	XXXXXXXX	XXXXXXXX
49	XXXXXXXX	XXXXXXXX

### NHR Consumers

1	XXXXXXXX
2	XXXXXXXX
3	XXXXXXXX
4	XXXXXXXX
5	XXXXXXXX
6	XXXXXXXX
7	XXXXXXXX
8	XXXXXXXX
9	XXXXXXXX
10	XXXXXXXX