June QIDP Gathering Q&A – 6/23/22

Is a Comprehensive Functional Assessment (CFA) required in addition to completing the OhioISP?

No. All rule requirements related to the CFA can be captured in the OhioISP when completed properly.

Our CFA includes more detail than the OhioISP's assessment. How do we ensure we do not miss something?

It should be noted that there is a great deal of variance amongst existing CFAs from ICF to ICF, and there may be items in a current CFA that are not required by rule. The OhioISP discovery assessment is standardized and designed to capture all rule requirements related to the CFA. It also is intended to be flexible based on each person's unique situation. You may include as much detail as necessary. If there is critical information to include, you should add it to the most appropriate assessment section. For more information, please reference the OhioISP Crosswalk.

Does every service require documentation to support it?

Paid services included in the OhioISP should be documented on service documentation sheets. You may use your own documentation sheets or the auto-generated sheets from the OhioISP Online system. For more information on what should be included as a service and support, please refer to the June Gathering Video.

Do we always have to have an outcome or experience related to medication administration, money management, or other essential personal skill?

No, an outcome or experience is not required as long as there is sufficient documentation noting this in the OhioISP. Per tag W242, "Developmentally incapable" is a decision made by the IDT that means a client does not have the capacity to acquire certain skill sets. The decision must be based on an assessment of the client's strengths, needs, and functional limitations. The determination of developmental incapability must be accompanied by written evidence supporting this determination.

Tag W227 adds, "The decision to prioritize such a program and to what level the program is developed is decided by the IDT based upon the results of the CFA and in consideration of such factors as, transferable skills, the ability to make choices, the ability to identify preferences and cognitive abilities such as attention span and an understanding of the principle of cause and effect."

Where do the programs with goals go in the OhioISP?

If the OhioISP Discovery Assessment indicates a person would benefit from working on specific skills, a program may be included as part of an outcome. Outcomes focus on what the person wants to achieve

in their life and what is important to them. Experiences include what needs to happen in order for the person to be successful in achieving their outcome. Often, programs and goals will be listed as an experience a person needs. Several programs or goals may be listed under a single outcome. For more information on outcomes and experiences, please refer to the June Gathering Video.

I am still struggling with incorporating some of the "meat of programs" into experiences when an outcome is person-centered, and honestly it would be a total stretch to fit some of these programs into experiences if we are truly staying person-centered. What should I do when this happens?

You are correct that outcomes should be person-centered as they should connect to what is important to the person. Since experiences are the steps to take in order to be successful in achieving the outcome, experiences may be about what is important to the person or important for the person (including skills that need to be developed). If a particular skill doesn't seem to fit within the outcome, you may consider this a paid support and simply add it to the Services and Supports section in the OhioISP.

If the individual is not able to answer what they would like to do with their life, how do we come up with the outcome?

Outcomes should relate to something the person wants to accomplish. While it may not always be clear for some people (may not know, may have limited expressive communication skills, etc.), there are several ways you can develop an outcome. These include, but are not limited to, the following:

- Use observation to note nonverbal cues about what the person likes, does not like, etc.
- Obtain collateral information from those who know the person best.
- Create an outcome that attempts to discover what the person likes or wants to accomplish.
- Make an educated guess based on the information available to the team. If you recognize that this initial assessment was incorrect, simply revise the outcome and/or experiences!
- For more ideas on this, please refer to the April Gathering Video.

If we are concerned about a citation that was issued during a survey, is there someone we can contact to help us offer guidance to avoid being cited?

You may contact the ODH Eastern Region or Western Region and a manager will discuss with you: 614-752-9524. You may also contact a DODD compliance manager at 614-466-6670.

Have ODH surveyors received training on the OhioISP and are they aware of available resources such as the ICF crosswalk?

All surveyors have completed the three online OhioISP trainings as well as a webinar with DODD and are currently notifying their manager of any concerns they encounter with the OhioISP so it can be discussed. They do have the crosswalk.

How do we meet the rule for quarterly reviews using the OhioISP? Can it just be notes with whether or not the individual is meeting the outcome or services?

There are several options to meet rule requirements for quarterly reviews in the OhioISP:

1. You can continue to complete paper reviews and upload them into the online system.
2. You can use the "What's Working/Not Working" section in the OhioISP discovery assessment to reflect where progress has or has not been made.
3. You can use the "Summary of Progress" portion of Outcomes/Experiences to show progress related to specific outcomes.

While where and how you complete these reviews may vary, the important part is that they are completed and documented according to rule.

Is there a training available for families of individuals?

Yes. You may refer family members here: OhioISP Overview Training for Individuals and Families.

Is it possible to have more services than outcomes/training goals?

Yes. The number of services and outcomes in the OhioISP may vary from person to person, depending on their wants and needs and how identified programs are prioritized by the team.

In ICFs we have always provided a lot of step-by-step processes for our staff to follow. Where does that information go in the OhioISP?

There are two sections in the OhioISP where methodology (step-by-step process) could be addressed: the Outcomes and Experiences section and the Services and Supports section.

- In Outcomes and Experiences, the most likely areas to capture this information would be under "what needs to happen" (a description of what experience the person needs to have or gain) or "how it should happen" (instructions for staff on what they should do to help make it happen) as part of each experience.
- In Services and Supports, specifically the Paid Supports section, the "Scope of service/What support looks like" area provides a place to include what the person needs and a list of instructions for staff on how they should provide the needed support.
- For more information, please reference the OhioISP Crosswalk.

Do the Day Habilitation Program and provider need to meet every 90 days and, if so, what documentation is required?

The regulation for Outside Services is as follows:

W120
(Rev. 135, Issued: 02-27-15, Effective: 04-27-15, Implementation: 04-27-15)
§483.410(d)(3) The facility must assure that outside services meet the needs of each client.
Guidance §483.410(d)(3)
Outside services are any services needed by the clients and not provided directly by the facility (hospital visits, dental visits, day program services, etc.).
Programs and services must be coordinated between the facility and the outside service, and foster consistency of implementation across settings of teaching strategies and behavior management.
The facility monitors outside services on an ongoing basis to ensure that services provided are consistent with the needs of each client as identified in the Individual Program Plan (IPP). For example, if the facility is implementing a behavior management or a communication program for the client, it is shared with the outside program and implemented by the outside program (workshop, day program, etc.) and the outside program agrees to incorporate it into their day program. At periodic intervals, the facility staff visit or communicate with the outside program to verify consistency across the two settings. With outside resources, it is the responsibility of the facility to assure that the services are provided in a safe clean environment, by appropriately qualified professions, and any untoward outcome of services are promptly addressed. If, in spite of attempts by the facility to assure compliance, the outside program does not implement the program for the client, then the facility remains responsible for the lack of active treatment.

For more information, please refer to the ICF State Operations Manual.