

**Coronavirus Disease 2019 (COVID-19):**  
**Quality Assessment & Improvement (QA&I) Interim Year 2**  
**Review Process**  
**ODP Announcement 21-052**

**AUDIENCE:**

Administrative Entities (AEs), Supports Coordination Organizations (SCOs), Providers rendering services through the Consolidated, Person/Family Directed Support, and Community Living Waivers (Intellectual Disability/Autism [ID/A] Waivers) and/or the Adult Autism Waiver (AAW), and other interested parties

**PURPOSE:**

This communication announces the planned commencement of an Office of Developmental Programs (ODP) Quality Assessment and Improvement (QA&I) interim review process for Fiscal Year (FY) 2021-2022 as a result of the impact of the COVID-19 pandemic.

**DISCUSSION:**

ODP received approval from the Centers for Medicare and Medicaid Services (CMS) through an Appendix K amendment to conduct a QA&I “interim” review for FY 2021-2022 and to delay the implementation of Cycle 2, Year 1 activities until FY 2022-2023.

The following is a summary of the approved changes for the interim review period:

- Timeline
  - The QA&I activities will begin in July 2021 and end in March 2022.
  - A detailed timeline will be included in Interim Year 2 process document.

- Sampling
  - ODP will pull a core sample of waiver individuals receiving services and supports using the proportionate random representative sampling methodology as described in the ID/A and AAW waivers.
  - ODP will also pull a separate Level of Care (LOC) sample to identify the individuals who have received an initial LOC assessment. This review of LOC determinations will focus on the timelines and accuracy of initial LOC determinations.
  - AEs will **not** pull their own sample and will receive their sample of providers and individual records from ODP.
  - Samples will tentatively be provided in July 2021.
- Tools
  - Questions remain aligned between the ID/A and AAW waivers so there will be one tool for SCOs and one tool for Providers.
  - For the ID/A waivers, there will be a separate tool for AEs.
  - Questions in Interim Year 2 will continue to focus on CMS Performance Measures, Information Sharing Advisory Committee (ISAC) focus areas, health and safety, and other areas that ODP identifies as a priority.
  - The timeframe for reviewing each question is 12 months from the date of the desk review unless otherwise specified. The same review period must be used when completing the desk review and the onsite review.
- Individual Interviews

- All individual interviews will be completed by Independent Monitoring for Quality (IM4Q) local programs, on behalf of ODP. AEs will not be conducting individual interviews during Interim Year 2.
- Questions related to the COVID-19 pandemic will be included.
- Self-Assessments
  - Entities not included in the Interim Year 2 sample will complete a modified self-assessment that will focus on CMS Performance Measures where statewide performance fell below the 86% threshold in Cycle 1, Year 3 (FY19-20).
  - Modified self-assessments will begin in September 2021.
  - AEs, SCOs and Providers that will receive an onsite review will not be required to complete and submit a self-assessment.
  - Providers who are only approved to render services in the AAW will not be required to complete a self-assessment whether they receive an onsite review or not.
- Desk and Onsite Reviews
  - All entities included in the Interim Year 2 sample will receive a desk and onsite review.
  - Onsite reviews are subject to change to virtual reviews. ODP will make an informed decision on changing the method of onsite reviews to virtual reviews in alignment with applicable CDC COVID-19 guidance.
  - All required documentation will be submitted to the QA&I team prior to the desk review.
- Entrance and Exit Conference

- Entrance and Exit Conferences with the QA&I team and entity leadership will be conducted during the onsite review.
  - In the event that an onsite review does not occur, a virtual conference will be held at the conclusion of the Desk Review.
- QA&I Spreadsheet and Corrective Action Plan (CAP)
  - These documents will continue to be utilized.
- Comprehensive Report
  - Reviewed entities will not receive a Comprehensive Report. A summary of results from the Interim Year 2 review will be included in the Annual Statewide QA&I Report.
  - A copy of the approved and validated QA&I spreadsheet along with the CAP (if applicable) will be sent electronically to the entity reviewed. Receipt of this information indicates that the Interim Year 2 review for the entity is complete.

Please note that the activities detailed in this announcement are subject to change. Once the updated resources and materials for the Interim Year 2 review are finalized, an email will be sent to all primary and secondary QA&I contacts noting their availability on the MyODP Training & Resource Center using the following path: Resources > ODP Information > QA&I Process.

ODP will be offering Interim Year 2 training opportunities in July 2021. Details regarding these trainings will be forthcoming.

Please send questions via email directly to the QA&I Process Mailbox at [RA-PWQAIProcess@pa.gov](mailto:RA-PWQAIProcess@pa.gov).