



DEPARTMENT OF ECONOMIC SECURITY

Your Partner For A Stronger Arizona

DIVISION OF DEVELOPMENTAL DISABILITIES

Sent on Behalf of DES/DDD

QUALITY MANAGEMENT BULLETIN - JULY 2024

Target Audience - Qualified Vendors and Providers

Transmittal Date - 07/30/2024

Happy “heatwave” July everyone. I hope you are all staying cool. Today’s bulletin will be focused on our hardworking program monitoring department Behavior Treatment Plan domain and Community Partner interviews.

Behavior Treatment Plan

The Program Monitoring Behavior Treatment Plan (BTP) domain scope consists of many vendor responsibilities and requirements in addition to having and implementing the approved BTP itself. Most requirements cited in this domain are directly from Article 9; however, some overlapping supporting requirements in Article 8 (such as R6-6-806.M, which outlines requirements when medication is prescribed for behavior-modifying purposes) are also reviewed. The DDD Behavioral Supports Manual provides more information regarding Behavioral Health Supports and Services.

Regardless, if a member has or needs a behavior treatment plan, Program Monitoring will look to ensure prohibited behavioral interventions are not being used at any time. Examples of these might include seclusion, use of noxious stimuli, overcorrection, or physical /mechanical restraint as a negative consequence.

One of the first areas of focus is ensuring the timely submission of a BTP **within 90 days** of placement or when an identified need has occurred. When a plan (or plan recommendation) is submitted from the team to PRC for review, receipt of this plan from PRC should be maintained and presented to Program Monitoring as documentation supporting timely submission. If a BTP has surpassed its annual approval date, the team should continue to run the existing plan to the best of its ability while waiting for the renewal to be approved.

Documentation supporting the BTP objective is implemented, (tracking forms) are reviewed, and bi-monthly monitoring of the BTP for the past 12 months will be verified. This monitoring needs to be conducted by someone who is not actively running the plan with the member. It should verify data is collected that demonstrates implementation of the BTP by staff (objective tracking, target behavior frequency, and intensity tracking), is accurate, and ensures the internal staff training record identifies which staff are trained to implement the BTP.

Informed consent must be obtained for each behavior-modifying medication that a member takes, and medication reviews must occur with the prescribing physician at least quarterly. Informed consent for each behavior-modifying medication taken by the member will be reviewed to ensure it is signed annually by the responsible person, and the current daily dosage does not exceed the maximum dosage approved per the consent.

This must occur even if the team is in the early stages of developing a BTP and is required for any medication prescribed to alter or change behavior. If a behavior-modifying medication is prescribed, the vendor is responsible for tracking the frequency and intensity of the target behavior for which it is prescribed. This target behavior data must then be presented to the prescribing physician during quarterly reviews.

In addition, data of any side effects observed, or the lack of side effects must be presented to the physician. Quarterly medication consultation forms maintained in the member's file should additionally list any physician's recommendations, follow-up directions, or other comments. The vendor would also need to record that the responsible person was notified if any medication changes occur, and that PRC is notified if there are any medication dose increases or new behavior-modifying medications prescribed for the member.

Program Monitoring-Community Partner Interviews

Since 2020, Community partner interviews have become part of the routine monitoring process. The AHCCCS Home and Community Based Setting Rules require the DDD Programming monitoring team to conduct interviews with two community partners per site. These partners, who have regular interaction with the provider's staff and the members, will provide information about the level of interaction between them. The purpose is to ensure community engagement.

Each site will be required to provide two community partners' contact information. They will answer two questions which are not member-specific:

Question 1. Is the setting valuable to the general community?

Question 2. Do you see individuals in the setting interacting with the general community?

You can reference the AHCCCS website for more clarification at <https://www.azahcccs.gov/HCBS>. Please see the HCBS Provider Training tab located at the bottom of the page.

Sharing information about your business is not a HIPPA violation. We will not be discussing members' specifics or medical diagnosis. We do not require you to maintain the information in any member files. The information is about the service site.

Acceptable Examples:

- A person from a place where the staff and members attend on a regular basis, such as a recreational center, gym, YMCA, bowling alley, library, or community center/pool.
- A coach, teacher, or instructor from the Special Olympics, sports, or recreational classes.
- A pastor, church member, or leader from a volunteer opportunity.
- A neighbor who communicates with you and is aware when you go out into the community to do activities.

Non-Acceptable Examples:

- General employees at a grocery store, gas station, or at retail stores. A specific person needs to be identified with a connection.
- Paid providers, family members, employees of the provider, and other members.

If you have any questions for the Program Monitoring Team, please reach out by email or phone:

Email: dddmonitoring@azdes.gov, phone: 602-542-2550.

For all other QM inquiries please reach out to one of the District emails below.

- District Central - DDDCentralIR@azdes.gov
- District East - DDDEastIR@azdes.gov

- District North - DDDDistrictNorthIncidentReports@azdes.gov
- District South - DDDD2IR@azdes.gov
- District West - DDDWestIR@azdes.gov

As always, thank you for continuing to care for the DDD community and for your continued collaboration, and have a great summer.