

## **PERSONALCHOICE ADVISEMENT AGENCY CERTIFICATION STANDARDS**

The State of Rhode Island, Department of Human Services (hereinafter DHS), is seeking interested vendors to provide Service Advise ment services for adults with disabilities and elders funded under DHS's PersonalChoice program. Eligible vendors will be those corporations that can demonstrate a track record of service to adults with disabilities and elders in a home and community based settings, a commitment to the principles of Participant Direction/Self-Determination and experience in working with adults with disabilities and elders in maintaining and enhancing independence through the provision of home and community based services and supports.

### **Background:**

In October 2004, RI DHS was awarded a 3-year grant from the Robert Wood Johnson Foundation in the amount of \$250,000 to develop and implement a Cash and Counseling Program (in Rhode Island it will be called PersonalChoice) for eligible Medicaid beneficiaries in RI. DHS has applied for a 1915c Waiver from the Centers for Medicare and Medicaid Services (CMS) to provide ongoing funding for the program.

The PersonalChoice program is a participant (service recipient) directed program designed to provide in-home services and supports to adults with disabilities and elders utilizing a Cash and Counseling model. The "Cash" portion of the model refers to the cash allowance each participant is offered to purchase and manage his/her personal assistance services. "Counseling" refers to services provided to participants to enable them to make informed decisions that work best for them, are consistent with their needs, and reflect their individual circumstances.

The National Institute on Consumer-Directed Long-Term Services defines participant direction as:

" A philosophy and orientation to the delivery of home and community-based services whereby informed consumers assess their own needs, determine how and by whom these needs should be met, and monitor the quality of services received. Consumer direction may exist in differing degrees and may span many types of services. It ranges from individuals independently making all decisions and managing services directly to individuals using an advocate or representative of their choice to manage needed services. The unifying force is that individuals have primary authority to make choices that work best for them, regardless of the nature or extent of their disability or the source of payment for services."

### **Scope of Services**

The contractor will provide Service Advise ment services to participants in the PersonalChoice program. Service Advise ment services include, at a minimum, the following:

- Assessing and Enrolling participants

- Developing, Implementing and Monitoring of Individual Service and Spending Plan (ISSP)
- Providing training and guidance to program participants in order to support self-direction
- Ensuring participant's health and safety through routine program monitoring activities
- Promoting participants independence by providing annual assessments of accessibility, equipment needs, and health education needs

The contractor shall ensure the above services are provided in the following manner:

## **1. ACCEPTANCE AND ADMISSION POLICIES AND PROCEDURES**

- 1.1 Each advisement agency shall define the population it intends to serve under PersonalChoice as follows: Adults 18 years of age and older who require assistance with safe and timely completion of their Activities of Daily Living (ADL) as a result of a physical or cognitive disability.
- 1.2 Each advisement agency shall have a mission and philosophy statement that reflects the needs of the participant, the services and supports it is committed to providing and a commitment to the philosophy of Consumer Direction and individual choice.
- 1.3 Each advisement agency shall guarantee freedom from unlawful discrimination on the basis of race, color, creed, national origin, religion, sex, sexual orientation, age, physical or mental disability, or degree of disability.
- 1.4 Each advisement agency shall provide information to the participant about available options for Home and Community based care in order for the participant to make an informed choice, including information on PersonalChoice.
- 1.5 Each advisement agency shall have a written policy on participants who are appropriate and those who may not be appropriate for enrollment in PersonalChoice. These eligibility criteria shall include, but not be limited to, the following:
  - 1.5.1 Each participant shall have a disability that affects their cognitive or physical capacity to complete ADLs in a safe or timely manner.
  - 1.5.2 Each participant must be a Medical Assistance (MA) recipient or eligible for MA through DHS Long Term Care eligibility rules.
    - A. If participant is not currently enrolled in MA, the advisement agency shall assist the participant in applying for, and maintaining MA Waiver eligibility.

- 1.5.3 Each participant shall meet a Nursing Facility level of care as determined by DHS Office of Medical Review.
- 1.5.4 Each participant shall possess the ability to self-direct and manage all aspects of their personal care and community living needs or, have a surrogate representative available and willing to manage those aspects of the program that the participant is either unable or unwilling to do.
- 1.6 Each advisement agency shall conduct an assessment of each potential participant in order to screen whether or not the participant meets the enrollment criteria for PersonalChoice and if the program will meet the individual participant's needs.
  - 1.6.1 A member of the agency staff skilled in case management, independent living counseling or social work will conduct the assessment initially. If this person feels participant is appropriate for placement in PersonalChoice then further assessment is to be conducted in areas of environmental accessibility and health and medical needs.
  - 1.6.2 The environmental accessibility and health/medical assessments shall be conducted as part of the intake process subsequent to the initial assessment and should be conducted by individuals skilled to address needs in those areas.
  - 1.6.3 The participant, or their designated representative shall be the primary source of information needed for the assessment, although others may take part, if requested by the participant.
  - 1.6.4 The minimum assessment components shall be specified by DHS.
- 1.7 Written documentation of the assessment shall be:
  - 1.7.1 Maintained by the agency,
  - 1.7.2 Transmitted to DHS via an internet based system maintained by DHS within one week of completion for review and budget determination.

## **2. PROGRAM MONITORING PROCEDURES**

- 2.1 Each advisement agency shall monitor participant's participation in the PersonalChoice program to ensure health and safety, satisfaction, the adequacy of the current spending plan, and progress towards participant identified goals.

- 2.2 During the initial twelve (12) months of enrollment in PersonalChoice the following minimum monitoring guidelines shall be met:
  - 2.2.1 Home visits during the 3<sup>rd</sup>, 6<sup>th</sup> and 9<sup>th</sup> month of program participation.
  - 2.2.2 Phone contact with the participant during months in which no home visit is made.
  - 2.2.3 A full Team re-assessment after the 12<sup>th</sup> month of enrollment.
- 2.3 After the initial 12 months of enrollment in PersonalChoice the following minimum monitoring guidelines shall be met:
  - 2.3.1 Home visits bi-annually and telephone contact quarterly during months where no home visit takes place.
  - 2.3.2 Complete Team re-assessments yearly.
- 2.4 As part of Program monitoring each advisement agency shall provide technical assistance to the participants enrolled in PersonalChoice as needed in the areas of service implementation, budget and fiscal records management and take corrective action if needed to ensure participant's health and safety in spending plan (ISSP) implementation prior to any adverse action or discharge from PersonalChoice.
  - 2.4.1 Report allegations or suspicion of misuse of Medicaid funds to the Medicaid Fraud Unit.
  - 2.4.2 Report all instances of abuse of the participant or self-abuse as per Rhode Island law.
  - 2.4.3 Assist the participant in monitoring the delivery of services detailed in the participant's spending plan (ISSP), (i.e. personal care assistants, community providers etc.)
- 2.5 Documentation of Program Monitoring activities shall be maintained by the advisement agency in a format to be determined and should contain results of all interactions with the participant and/or representative or others as it pertains to the participant's management of the PersonalChoice program.

### **3. PARTICIPANTS RIGHTS AND RESPONSIBILITIES**

- 3.1 Advisement Agencies participating in the PersonalChoice program shall assure that all participants are afforded the following rights, as well as any others deemed appropriate by the agency, and be informed of said rights.

- 3.1.1 The right to be treated as an adult, with dignity and respect at all times.
- 3.1.2 The right to privacy in all interactions with the agency and others as necessary and be free from unnecessary intrusion.
- 3.1.3 The right to make informed choices based upon appropriate information provided to the participant, and to have those choices respected, while respecting the rights of others to disagree with those choices.
- 3.1.4 The right to freely choose between approved providers for both advisement and fiscal intermediary services.
- 3.1.5 The right to feel safe and secure in all aspects of life, including health and wellbeing; be free from exploitation and abuse; but not be overprotected.
- 3.1.6 The right to realize the full opportunity that life provides by not being limited by others, making full use of the resources the program provides, and being free from judgments and negativity.
- 3.1.7 The right to live as independent a life as one chooses.
- 3.1.8 The right to have individual ethnic background, language, culture and faith valued and respected.
- 3.1.9 The right to be treated equally and live in an environment that is free from bullying, harassment and discrimination.
- 3.1.10 The right to voice grievances about services without fear of discrimination or reprisal.
- 3.1.11 The right to voluntarily withdraw from the program at any time.
- 3.1.12 The right to manage personal care assistants.
  - A. The right to hire who the participant wants to assist them
  - B. The right to decide what special knowledge or skills the assistant must possess.
  - C. The right to train each assistant to meet the participant's individual needs.
  - D. The right to replace assistants who do not meet the participant's needs.
- 3.1.13 The right to request a new assessment if participant's needs change.
- 3.1.14 The right to change the spending plan as needs or goals change.
- 3.1.15 The right to appeal any decision made by the advisement agency or DHS in regards to any adverse action.

- 3.2 The participant enrolled in the PersonalChoice program and/or their appointed representative have the following responsibilities.
- 3.2.1 The responsibility to manage and maintain his/her health and to access medical help as needed or to seek assistance in order to do so.
  - 3.2.2 Demonstrate the required skills and abilities needed to self-direct personal assistants without jeopardizing health and safety, or designate a surrogate representative to assist them.
  - 3.2.3 Act as a supervising employer by:
    - A. Deciding wages, schedules and benefits (if any) for their assistants.
    - B. Completing hiring agreements with each personal care assistant.
    - C. Follow all employment laws and regulations
    - D. Follow all requirements of the Fiscal Intermediary/IRS in regards to hiring and paying personal care assistants including: completing all necessary forms, reviewing time sheets for accuracy and submitting them in a timely manner, and paying personal care assistants promptly.
    - E. Treat all employees with dignity and respect.
  - 3.2.4 Manage personal assistant services by:
    - A. Meeting and cooperating with advisement agency staff as required to complete all needed assessments and monitoring.
    - B. Develop and monitor a spending plan (ISSP) to address personal care assistance needs within the requirements of the PersonalChoice program.
    - C. Hire and supervise personal care assistants and ensure they are performing their duties as needed.
    - D. Tracking expenses so that monthly spending plan (ISSP) is not exceeded.
    - E. Notifying advisement agency of any changes in medical status or admissions to hospitals or other medical facilities.
    - F. Ensure a safe working environment for personal care assistants.

#### **4. INDIVIDUAL SERVICE AND SPENDING PLANS (ISSP) AND PARTICIPANT RECORDS**

- 4.1 Advisement agencies shall conduct the minimum assessment elements specified by DHS during the Intake Process and utilize the results of that assessment and the monthly budget amount provided by DHS to develop a written spending plan (ISSP) prior to the participant starting service in PersonalChoice.
- 4.2 The participant, in consultation with agency staff and any others the participant may wish to participate, shall develop each plan.
- 4.3 Recommendations generated from the Team assessment may be incorporated into the spending plan (ISSP) at the discretion of the participant.

- 4.4 The spending plan (ISSP) shall be in a format to be determined by DHS but shall include at a minimum:
  - 4.4.1 Method that participant's identified needs will be addressed through the provision of personal care assistance
  - 4.4.2 Number of hired workers, number of hours they will work per week and rate of pay.
  - 4.4.3 Any ongoing purchases of goods and other services, type, cost and frequency.
  - 4.4.4 Any large purchases that will require monthly savings and amount dedicated to the purchase.
  - 4.4.5 A back-up plan detailing how participant's personal care needs will be met when hired assistants are temporarily unavailable and cost of that plan.
  - 4.4.6 Participant identified goals that participation in PersonalChoice will address.
- 4.5 Each advisement agency shall review each participant developed PersonalChoice spending plan (ISSP) to ensure it addresses the following issues:
  - 4.5.1 That the participant's health and safety needs are reasonably expected to be met given the spending plan (ISSP).
  - 4.5.2 That the spending plan (ISSP) is appropriate including whether the goods and services purchased meet the service criteria and spending guidelines, payment rates appear to be appropriate, etc.
- 4.6 Each advisement agency shall provide PersonalChoice participants with resources and training materials to assist them in developing their spending plan (ISSP) and in managing a self-directed personal assistance program.
- 4.7 Each advisement agency shall forward a copy of this plan to DHS within one week of completion for review and approval via the internet based tool maintained by DHS.
- 4.8 The approved plan will be returned to the advisement agency with copies sent to the participant and the fiscal intermediary agency designated by the participant.
- 4.9 The advisement agency shall maintain a copy of the approved plan in the participant's record and review it with the participant during all program-monitoring activities.

- 4.10 The advisement agency shall maintain individual participant records arranged for easy access and use by staff.
- 4.11 Each individual participant record shall contain:
  - 4.11.1 Initial and subsequent Assessment(s)
  - 4.11.2 Completed and approved spending plan (ISSP)
  - 4.11.3 Progress notes describing any scheduled or non-scheduled interactions
  - 4.11.4 Documentation of program monitoring activities
  - 4.11.5 Financial eligibility and Waiver eligibility documentation
  - 4.11.6 Participant demographics and contact information, including emergency contact information
  - 4.11.7 Participant selected goals and documentation of review of those goals and achievement as appropriate
- 4.12 Individual participant records and all documents associated with identifiable individual participants shall be maintained as confidential materials in accordance with current state and federal laws, rules and regulations; and in compliance with current policies and procedures of DHS. Storage of all participant records and documents shall assure their safety from inappropriate use and from fire and other unplanned destruction.
- 4.13 The advisement agency shall develop and follow written policies establishing guidelines for storage and retention of participant's records, including:
  - 4.13.1 Retention of records for period of time specified in DHS's current Record Retention Schedule; and
  - 4.13.2 Guidelines for the removal of participant records from file.

## **5. ADVISEMENT AGENCY SERVICES**

- 5.1 Advisement agencies shall provide, the services specified below, at a minimum, to all participants enrolled in the PersonalChoice program:
  - 5.1.1 Service Advisement services, which are designed to:
    - A. Assess the participant for placement on the program
    - B. Facilitate participant directed services by assisting the participant in developing and implementing their spending plan (ISSP).



- C. Monitor program implementation, ongoing service delivery and participant's health and safety.
  - D. Provide initial and ongoing training to the participant and/or designated representative in order ensure that all program requirements are met.
  - E. Assess the participant's community integration needs and assist in accessing services as needed.
  
- 5.1.2 Mobility and Environmental Accessibility services, which are designed to assist the participant to become more independent in their home and in the community. This would be accomplished by:
  - A. Assisting the participant by assessing the need for Adapted Equipment, Home Modifications and/or Assistive Technology, both high and low tech that will improve the participant's independence and safety in their home environment and in accessing the community.
  - B. Assisting in identifying, and applying for, funding to purchase identified equipment or modifications, separate from participant's monthly budget funds, if possible.
  - C. Training and education in the use of adapted equipment that will increase participant's independence or increase the safety and efficiency of workers.
  
- 5.1.3 Health Management and Education services, which are designed to provide information and guidance to the participant in managing their disability and/or chronic medical condition(s) with a focus on optimizing personal health and wellness and preventing the development of secondary conditions. This would be accomplished by:
  - A. Assessing participant's current medical condition and how it relates to and interacts with their disability or chronic condition(s).
  - B. Provide to the participant educational and training opportunities so that they may better manage the effects of their disability or chronic condition(s) and prevent development of additional medical conditions, either personally or through existing community resources.
  - C. Assist participants in identifying, applying for and accessing available community resources in the areas of wellness and health promotion or maintenance.
  
- 5.1.4 Peer Support opportunities for PersonalChoice participants, representatives and their families. It has been demonstrated that Peer Support is a valuable part of a self-directed program as it provides the opportunity for those involved to share problem solving strategies and issues surrounding this type of program; which then results in higher levels of satisfaction and quality care. This would be accomplished by:

- A. Identifying those participants and/or representatives and family members who would be willing to take part in this activity during the assessment or monitoring process.
- B. Establishing a registry of interested parties and facilitating contact between those parties.

## **6. STAFFING REQUIREMENTS**

- 6.1 Each advisement agency shall employ sufficient staff to meet the above PersonalChoice program requirements. The agency may directly employ staff or enter into agreements with consultants or other agencies, as needed, contingent on assurances that all contracted providers meet the minimum qualifications and adhere to the philosophy of Participant Direction.
- 6.2 The agency shall designate one staff member to act as Program Director for purposes of overseeing all agency operations as they pertain to the PersonalChoice program.
- 6.3 The agency shall make use of the services of a nurse who will devote time sufficient to conduct Health Assessments annually for all PersonalChoice program participants as detailed above, as well as well as Medical Management and Education services as needed.
- 6.4 The agency shall make use of the services provided by a person trained in conducting community based assessments for accessibility and adapted equipment needs for people with disabilities and elders as it pertains to improving their independence and safety. This person would conduct Equipment/Accessibility assessments annually for all PersonalChoice program participants as detailed above and other Accessibility/Equipment services as needed.
- 6.5 The agency shall designate staff to act in the role of Advisor, which is the terminology used to describe the Counseling function in the PersonalChoice program. This person will have the most frequent contact with the participant and will serve as the point of contact between the participant and the advisement agency. This person should have sufficient time allotted so that all program assessment, training and monitoring can be accomplished within the required time frames.
- 6.6 The advisement agency shall have a written agreement with any other agency, program or other service provider that will be providing any service under the PersonalChoice program as detailed above. This agreement shall be updated annually. The nature and extent of the services provided shall be documented. Responsibility for the performance of all subcontractors remains with the advisement agency.

## **7. STAFF QUALIFICATIONS AND RESPONSIBILITIES**

- 7.1 The advisement agency shall maintain current, functional job specifications for all staff positions involved in providing services to PersonalChoice participants, consistent with the following requirements:
- 7.1.1 The Program Director shall have at least a bachelor's degree or equivalent education; and at least three years experience in health, human services, geriatrics, rehabilitation, independent living or related field. The Program Director shall be able to perform the following tasks:
- A. Direct and Supervise all aspects of the program;
  - B. Supervise all staff members;
  - C. Perform program and staff evaluations;
  - D. Respond to all reporting requirements of the department;
  - E. Direct the coordination of program services.
- 7.1.2 The nurse shall hold a current Rhode Island RN or LPN license and have 2-3 years experience in Home and Community based nursing and/or Rehabilitation nursing and possess a strong commitment to the principles of Participant Choice and Participant Direction. The nurse shall perform the following duties:
- A. Evaluate, on an annual basis, the participant's medical condition and its effect on the participant's daily functioning utilizing an agreed upon assessment;
  - B. Provide educational opportunities to address issues raised during the medical assessment designed to assist the participant to manage the effects of their disability or chronic condition and prevent development of secondary medical conditions. This may be done individually on a group level or utilizing existing community resources.
  - C. Assist participants in identifying and accessing available community resources in the areas of wellness and health promotion or maintenance.
- 7.1.3 The person providing Accessibility/Mobility assessments and training shall possess previous experience in conducting these types of assessments on a community level. This person may be a licensed Physical or Occupational Therapist and/or a certified Assistive Technology Practitioner as certified by RESNA (Rehabilitation Engineering & Assistive Technology Society of North America). Optimally this person shall have experience gained through employment at an Independent Living Center, and possess a strong commitment to the principles of Participant Choice and Participant Direction. This person is expected to perform the following duties:
- A. Evaluate, on a yearly basis, the participant's ability to function within their home and in the community and make recommendations on any home modifications, adapted equipment or assistive technology that would increase the participant's independence or safety utilizing an agreed upon format.

- B. Assist the participant in identifying, and applying for, funding to acquire any modifications or equipment recommended in the assessment.
  - C. Provide training and education in the safe use of equipment or modifications for both the participant and any caregivers the participant identifies.
- 7.1.4 The Advisor shall possess the skills and experience gained through providing case management, independent living counseling or other community living services to people with disabilities or elders and/or the achievement of a bachelor's degree in a Human Service or health related field. The Advisor is expected to perform the following duties:
- A. Assess each participant initially for eligibility for the program and re-assess his or her ongoing eligibility on a yearly basis utilizing the PersonalChoice Functional Assessment;
  - B. Assist the participant in identifying and removing barriers to improve independence in community living;
  - C. Assist the participant in developing, implementing and monitoring PersonalChoice services through an individual spending plan;
  - D. Provide training and assistance to the participant and/or designated representative to operate a participant directed home care program.

## **8. PROGRAM MONITORING AND IMPROVEMENT**

- 8.1 The advisement agency shall have a system in place to monitor the services it provides to PersonalChoice participants in the following domains:
- A. Participant access to services
  - B. Participant-centered service planning and delivery
  - C. Agency capacity and capabilities
  - D. Participant safeguards
  - E. Participant rights and responsibilities
  - F. Participant outcomes and satisfaction
  - G. Overall system performance
- 8.2 As part of this system the advisement agency shall conduct a participant satisfaction survey, in an agreed upon format, on an annual basis.
- 8.3 The advisement agency shall establish an incident/complaint reporting and resolution system.
- 8.4 The advisement agency shall take part in quality assurance/improvement activities as determined by DHS. This may include providing representation on groups or committees.

## **9. DISCHARGE POLICIES AND PROCEDURES**

The Advisement Agency shall develop written policies and procedures in regards to voluntary and involuntary discharge from PersonalChoice. These policies and procedures should contain the following:

- 9.1 Participants and Representatives may be discharged from PersonalChoice voluntarily or involuntarily.
  - 9.1.1 Voluntary discharge, participant or a participant's representative may request discharge with 30 days notice to the advisement agency.
  - 9.1.2 Involuntary discharge occurs when: a participant proves to be unable to self-direct purchase and payment of long-term care, when a representative proves incapable of acting in the best interest of the participant, or when the participant invalidates the terms of their Participation Agreement.
  - 9.1.3 Participant must be referred to alternative home and community based program or most appropriate care facility prior to discharge date.
- 9.2 Involuntary discharge from PersonalChoice may result from any of the following criteria:
  - 9.2.1 A substantiated personal care assistant claim of non-payment in which the participant or representative cannot show proof of payment or payment processing.
  - 9.2.2 Evidence that Medicaid funds were used improperly/illegally in accordance with local, state or federal regulations.
  - 9.2.3 Failure to comply with legal/financial obligations as an employer of domestic workers and/or unwillingness to participate in advisement or training to remedy lack of compliance.
  - 9.2.4 Inability to manage the monthly spending plan as evidenced by:
    - A. Overdrafts of the participant's PersonalChoice monthly budget.
    - B. Underutilization of the monthly budget, which results in going without personal care assistance.
    - C. Continual attempts to spend budget funds on non-allowable items and services.
  - 9.2.5 Failure to maintain health and well-being through actions and/or inactions of the participant or representative.
  - 9.2.6 Failure to maintain a safe working environment for personal care assistants.
  - 9.2.7 Substantiated complaints of participant's self-neglect, neglect or other abuse on the part of the participant or the representative.

- 9.2.8 Refusal to cooperate with minimum program oversight activities, even when staff has made efforts to accommodate the participant's personal needs relating to participation.
- 9.2.9 Loss of eligibility, either Medicaid financial eligibility or Waiver level of care eligibility.
- 9.2.10 Participant moves from current living arrangement into more skilled setting (i.e. Assisted Living, Group Home or Skilled Nursing facility).
- 9.2.11 Participant's representative can no longer assist participant, and no replacement representative is available (if applicable).
- 9.3 Right to Appeal Involuntary Discharge from PersonalChoice.
  - 9.3.1 Advisement Agency must have a DHS approved internal appeals process in place.
  - 9.3.2 Participant has a right to appeal utilizing DHS standard appeals process.

## **10. CUSTOMER SERVICE REQUIREMENTS**

- 10.1 The Advisement agency must meet the following minimum requirements in the areas of customer service and participant access.
  - 10.1.1 A toll-free telephone number, or make other reasonable accommodations for participants outside the agencies local calling area
  - 10.1.2 A TTY line
  - 10.1.3 Secure internet and email communication
  - 10.1.4 Foreign language and American Sign Language Interpreter availability.
  - 10.1.5 Materials available in alternative formats as needed by participants such as, but not limited to, large print
  - 10.1.6 A method for receiving, responding to, and tracking complaints from participants and/or representatives within 48 hours.
  - 10.1.7 A representative of the agency available between the hours of 9:00 AM and 4:30 PM Monday through Friday. When a representative is unavailable the agency should maintain a voice mail or other messaging capability to record

after hour's contacts and respond to those contacts within one working day from the time received.

10.1.8 A 24 hour fax line

10.1.9 Written policies and procedures ensuring that communications be directed and centered with the participant receiving services at all times, regardless of the participant's disability. When the participant has designated a representative to assist them in managing their program the agency should only communicate with that representative in areas that the participant is requesting assistance with. The Advisement agency shall not disclose or otherwise inform family members, friends or other members of the participant's support system without prior written notification and approval from the participant/representative. Exceptions to this shall only be allowed in circumstances where the participant's immediate health and safety are at risk in order to notify appropriate emergency personnel.

10.1.10 Provide access, in some form, to a registry of qualified employees available for potential employment by participants.

10.1.11 The agency must develop, or have in place, policies and procedures that emphasize the application of the philosophy of participant direction and being culturally sensitive in all business practices in order to communicate effectively with a diverse population of participants of all ages and with a variety of needs and disabilities.

10.1.12 Have written policies and procedures detailing how it will monitor its customer service activities.

## **11. REPORTING REQUIREMENTS**

The Advisement agency is required to gather, maintain and make available to DHS data in regard to services it provides to PersonalChoice participants to fulfill the requirements as previously stated. This data shall include but is not be limited to.

11.1 Participant demographic information

11.2 Type, purpose and duration of any and all interactions as it relates to the PersonalChoice program.

11.3 Participant incident reporting and resolutions

This data shall be in a format agreed upon by DHS and shall be transmitted on an agreed upon schedule.