



Date: March 20, 2015

To: Gale Idstein, Director/Consultant
 Provider: CNRAG, Inc. (dba Care Network Resources Group)
 Address: 225 E Idaho Avenue
 State/Zip: Las Cruces, New Mexico, 88005

E-mail Address: gidstein@cnragusa.com

CC: Roxanne Gates, Owner

E-Mail Address rgates@cnragusa.com

Region: Statewide
 Survey Date: February 6-11, 2015

Program Surveyed: Mi Via Waiver
 Service Surveyed: Mi Via Consultation Services
 Survey Type: Initial

Team Leader: Erica Nilsen, BA, Healthcare Surveyor, Division of Health Improvement/Quality Management Bureau
 Team Members: Nicole Brown, MBA, Healthcare Surveyor, Division of Health Improvement/Quality Management Bureau; Amanda Castaneda, MPA, Healthcare Surveyor, Division of Health Improvement/Quality Management Bureau

Dear Ms. Idstein;

The Division of Health Improvement/Quality Management Bureau Mi Via Survey Unit has completed a compliance survey of the services identified above. The purpose of the survey was to determine compliance with federal and state standards; to assure the health, safety, and welfare of individuals receiving services through the Developmental Disabilities Waiver; and to identify opportunities for improvement. This Report of Findings will be shared with the Developmental Disabilities Supports Division for their use in determining your current and future provider agreements. Upon receipt of this letter and Report of Findings your agency must immediately correct all deficiencies which place Individuals served at risk of harm.

Plan of Correction:

The attached Report of Findings identifies the deficiencies found during your agency’s compliance review. You are required to complete and implement a Plan of Correction. Your agency has a total of 45 business days (10 business days to submit your POC for approval and 35 days to implement your *approved* Plan of Correction) from the receipt of this letter.

Submission of your Plan of Correction:

Please submit your agency’s Plan of Correction in the space on the right-hand column of the Report of Findings. (See attachment “A” for additional guidance in completing the Plan of Correction).

Within 10 business days of receipt of this letter your agency Plan of Correction must be submitted to the parties below:

1. **Quality Management Bureau**
Attention: Plan of Correction Coordinator
5301 Central Ave. NE Suite 400 Albuquerque, NM 87108

2. Developmental Disabilities Supports Division
Attention: Mi Via Program Manager
5301 Central Ave. NE Suite 200 Albuquerque, NM 87108

Upon notification that your Plan of Correction has been approved, you must implement all remedies and corrective actions to come into compliance. If your Plan of Correction is denied, you must resubmit a revised plan as soon as possible for approval, as your POC approval and all remedies must be completed within 45 business days of the receipt of this letter.

Failure to submit your POC within the allotted 10 business days or complete and implement your Plan of Correction within the total 45 business days allowed may result in the imposition of a \$200 per day Civil Monetary Penalty until it is received, completed and/or implemented.

Request for Informal Reconsideration of Findings (IRF):

If you disagree with a finding of deficient practice, you have 10 business days upon receipt of this notice to request an IRF. Submit your request for an IRF in writing to:

QMB Deputy Bureau Chief
5301 Central Ave NE Suite #400
Albuquerque, NM 87108
Attention: IRF request

See Attachment "C" for additional guidance in completing the request for Informal Reconsideration of Findings. The request for an IRF will not delay the implementation of your Plan of Correction which must be completed within 45 total business days (10 business days to submit your POC for approval and 35 days to implement your *approved* Plan of Correction). Providers may not appeal the nature or interpretation of the standard or regulation, the team composition or sampling methodology. If the IRF approves the modification or removal of a finding, you will be advised of any changes.

Please call the QMB Plan of Correction Coordinator at 505-231-7436 if you have questions about the Report of Findings or Plan of Correction. Thank you for your cooperation and for the work you perform.

Sincerely,

Erica Nilsen

Erica Nilsen, BA
Team Lead/Healthcare Surveyor
Division of Health Improvement
Quality Management Bureau

Survey Process Employed:

Entrance Conference Date: February 9, 2015

Present: **CNRAG Inc. (dba Care Network Resources Group)**
Gale Idstein, Director
Makala Hale, Consultant
Donna Reid, Consultant
Tyanne Segura, Consultant

DOH/DHI/QMB

Erica Nilsen, BA, Team Lead/Healthcare Surveyor
Nicole Brown, MBA, Healthcare Surveyor
Amanda Castaneda MPA, Healthcare Surveyor

Exit Conference Date: February 11, 2015

Present: **CNRAG Inc. (dba Care Network Resources Group)**
Gale Idstein, Director/Consultant
Makala Hale, Consultant
Donna Reid, Consultant
Tyanne Segura, Consultant
Roxanne Gates, Owner

DOH/DHI/QMB

Erica Nilsen, BA, Team Lead/Healthcare Surveyor
Nicole Brown, MBA, Healthcare Surveyor
Amanda Castaneda MPA, Healthcare Surveyor

DDSD – Mi Via Program

Christine Wester, Mi Via Program Manager (Via Telephone)
Regina Lewis, Mi Via Program Coordinator (Via Telephone)

Administrative Locations Visited	Number:	1 (225 E Idaho Avenue, Las Cruces NM 88005)
Total Sample Size	Number:	33
Participant Records Reviewed	Number:	33
Consultant Staff Records Reviewed	Number:	4

Administrative Processes and Records Reviewed:

- Medicaid Billing/Reimbursement Records for all Services Provided
- Accreditation Records
- Oversight of Individual Funds
- Participant Program Case Files
- Personnel Files
- Agency Policy and Procedure Manual
- Caregiver Criminal History Screening Records
- Consolidated Online Registry/Employee Abuse Registry
- Quality Assurance / Improvement Plan

CC: Distribution List:

DOH - Division of Health Improvement
DOH - Developmental Disabilities Supports Division
DOH - Office of Internal Audit
HSD - Medical Assistance Division

Attachment A

Provider Instructions for Completing the QMB Plan of Correction (POC) Process

Introduction:

After a QMB Compliance Survey, your QMB Report of Findings will be sent to you via e-mail.

Each provider must develop and implement a Plan of Correction (POC) that identifies specific quality assurance and quality improvement activities the agency will implement to correct deficiencies and prevent continued deficiencies and non-compliance.

Agencies must submit their Plan of Correction within ten (10) business days from the date you receive the QMB Report of Findings. (Providers who do not submit a POC within 10 business days may be referred to the Internal Review Committee [IRC] for possible actions or sanctions).

Agencies must fully implement their approved Plan of Correction within 45 business days (10 business days to submit your POC for approval and 35 days to implement your approved Plan of Correction) from the date they receive the QMB Report of Findings (Providers who fail to complete a POC within the 45 business days allowed will be referred to the IRC for possible actions or sanctions.)

If you have questions about the Plan of Correction process, call the Plan of Correction Coordinator at 505-231-7436 or email at Anthony.Fragua@state.nm.us. Requests for technical assistance must be requested through your Regional DDSD Office.

The POC process cannot resolve disputes regarding findings. If you wish to dispute a finding on the official Report of Findings, you must file an Informal Reconsideration of Findings (IRF) request within ten (10) business days of receiving your report. Please note that you must still submit a POC for findings that are in question (see Attachment "C").

Instructions for Completing Agency POC:

Required Content

Your Plan of Correction should provide a step-by-step description of the methods to correct each deficient practice to prevent recurrence and information that ensures the regulation cited is in compliance. The remedies noted in your POC are expected to be added to your Agency's required, annual Quality Assurance Plan.

If a deficiency has already been corrected, the plan should state how it was corrected, the completion date (date the correction was accomplished), and how possible recurrence of the deficiency will be prevented.

The Plan of Correction must address the six required Center for Medicare and Medicaid Services (CMS) core elements to address each deficiency cited in the Report of Findings:

1. How the specific and realistic corrective action will be accomplished for individuals found to have been affected by the deficient practice.
2. How the agency will identify other individuals who have the potential to be affected by the same deficient practice, and how the agency will act to protect individuals in similar situations.
3. What QA measures will be put into place or systemic changes made to ensure that the deficient practice will not recur
4. Indicate how the agency plans to monitor its performance to make sure that solutions are sustained. The agency must develop a QA plan for ensuring that correction is achieved and sustained. This QA plan

must be implemented, and the corrective action evaluated for its effectiveness. The plan of correction is integrated into the agency quality assurance system; and

5. Include dates when corrective action will be completed. The corrective action completion dates must be acceptable to the State.
6. The POC must be signed and dated by the agency director or other authorized official.

Note: Instruction or in-service of staff alone may not be a sufficient plan of correction. This is a good first step toward correction, but additional steps should be taken to ensure the deficiency is corrected and will not recur.

Completion Dates

- The plan of correction must include a **completion date** for each finding. Be sure the date is **realistic** in the amount of time your Agency will need to correct the deficiency; not to exceed 45 total business days.
- Some deficiencies may require a staged plan to accomplish total correction.
- Deficiencies requiring replacement of equipment, etc., may require more time to accomplish correction but should show reasonable time frames.

Initial Submission of the Plan of Correction Requirements

1. The Plan of Correction must be completed on the official QMB Survey Report of Findings/Plan of Correction Form and received by QMB within ten (10) business days from the date you received the report of findings.
2. For questions about the POC process, call the POC Coordinator, Anthony Fragua at 505-231-7436 for assistance.
3. For Technical Assistance (TA) in developing or implementing your POC, contact your Mi Via Liaison at the Regional DDS Office.
4. Submit your POC to Anthony Fragua, POC Coordinator in any of the following ways:
 - a. Electronically at Anthony.Fragua@state.nm.us (*preferred method*)
 - b. Fax to 505-222-8661, or
 - c. Mail to POC Coordinator, 5301 Central Avenue NE, Suite 400, Albuquerque, NM 87108
5. Do not submit supporting documentation (evidence of compliance) to QMB until after your POC has been approved by the QMB.
6. QMB will notify you when your POC has been “approved” or “denied.”
 - a. During this time, whether your POC is “approved,” or “denied,” you will have a maximum of 45 business days from the date of receipt of your Report of Findings to correct all survey deficiencies.
 - b. If your POC is denied, it must be revised and resubmitted as soon as possible, as the 45-business day limit is in effect.
 - c. If your POC is denied a second time your agency may be referred to the Internal Review Committee.
 - d. You will receive written confirmation when your POC has been approved by QMB and a final deadline for completion of your POC.
 - e. Please note that all POC correspondence will be sent electronically unless otherwise requested.
7. Failure to submit your POC within 10 business days without prior approval of an extension by QMB will result in a referral to the Internal Review Committee and the possible implementation of monetary penalties and/or sanctions.

POC Document Submission Requirements

Once your POC has been approved by the QMB Plan of Correction Coordinator you must submit copies of documents as evidence that all deficiencies have been corrected, as follows.

1. Your internal documents are due within a maximum of 45 business days of receipt of your Report of Findings.

2. It is preferred that you submit your documents via USPS or other carrier (scanned and saved to CD/DVD disc, flash drive, etc.). If the documents do not contain protected Health information (PHI), the preferred method is that you submit your documents electronically.
3. All submitted documents must be annotated; please be sure the tag numbers and Identification numbers are indicated on each document submitted. Documents which are not annotated with the Tag number and Identification number may not be accepted.
4. Do not submit original documents; Please provide copies or scanned electronic files for evidence. Originals must be maintained in the agency file(s) per DDSD Standards.
5. In lieu of some documents, you may submit copies of file audit forms that clearly indicate cited deficiencies have been corrected, other attestations of correction must be approved by the Plan of Correction Coordinator prior to their submission.
6. When billing deficiencies are cited, you must provide documentation to justify billing and/or void and adjust forms submitted to Xerox State Healthcare, LLC. for the deficiencies cited in the Report of Findings. In addition to this, we ask that you submit:
 - a. Evidence of an internal audit of billing/reimbursement conducted for a sample of individuals and timeframes of your choosing to verify POC implementation;
 - b. Copies of “void and adjust” forms submitted to Xerox State Healthcare, LLC. to correct all unjustified units identified and submitted for payment during your internal audit.

Revisions, Modifications or Extensions to your Plan of Correction (post QMB approval) must be made in writing and submitted to the Deputy Chief at QMB, prior to the due date and are approved on a case-by-case basis. No changes may be made to your POC or the timeframes for implementation without written approval of the POC Coordinator.

Attachment C

Guidelines for the Provider Informal Reconsideration of Finding (IRF) Process

Introduction:

Throughout the QMB Survey process, surveyors are openly communicating with providers. Open communication means surveyors have clarified issues and/or requested missing information before completing the review through the use of the signed/dated “Document Request,” or “Administrative Needs,” etc. forms. Regardless, there may still be instances where the provider disagrees with a specific finding. Providers may use the following process to informally dispute a finding.

Instructions:

1. The Informal Reconsideration of the Finding (IRF) request must be received in writing to the QMB Deputy Bureau Chief **within 10 business days** of receipt of the final Report of Findings.
2. The written request for an IRF *must* be completed on the QMB Request for Informal Reconsideration of Finding form available on the QMB website: <http://dhi.health.state.nm.us/qmb>
3. The written request for an IRF must specify in detail the request for reconsideration and why the finding is inaccurate.
4. The IRF request must include all supporting documentation or evidence.
5. If you have questions about the IRF process, email the IRF Chairperson, Crystal Lopez-Beck at crystal.lopez-beck@state.nm.us for assistance.

The following limitations apply to the IRF process:

- The written request for an IRF and all supporting evidence must be received within 10 business days.
- Findings based on evidence requested during the survey and not provided may not be subject to reconsideration.
- The supporting documentation must be new evidence not previously reviewed or requested by the survey team.
- Providers must continue to complete their Plan of Correction during the IRF process
- Providers may not request an IRF to challenge the sampling methodology.
- Providers may not request an IRF based on disagreement with the nature of the standard or regulation.
- Providers may not request an IRF to challenge the team composition.
- Providers may not request an IRF to challenge the DHI/QMB determination of compliance or the length of their DDSD provider contract.

A Provider forfeits the right to an IRF if the request is not received within 10 business days of receiving the report and/or does not include all supporting documentation or evidence to show compliance with the standards and regulations.

The IRF Committee will review the request, the Provider will be notified in writing of the ruling; no face-to-face meeting will be conducted.

When a Provider requests that a finding be reconsidered, it does not stop or delay the Plan of Correction process. **Providers must continue to complete the Plan of Correction, including the finding in dispute regardless of the IRF status.** If a finding is removed or modified, it will be noted and removed or modified from the Report of Findings. It should be noted that in some cases a Plan of Correction may be completed prior to the IRF process being completed. The provider will be notified in writing on the decisions of the IRF committee.



The Citations in the following Report of Findings are based on the Mi Via Self-Directed Waiver Program Service Standards, effective 2/2012, the New Mexico Administrative Code (NMAC) 8.314.6 among other noted standards and regulations.

Agency: CNRAG Inc. (dba Care Network Resources Group) Statewide
Program: Mi Via Waiver
Service: Consultant Services
Monitoring Type: Initial Survey
Survey Date: February 6-11, 2015

Tag	Standard of Care Mi Via Self-Directed Waiver Program Service Standards, effective 2/2012, unless otherwise noted	Deficiencies	Agency Plan of Correction, On-going QA/QI, Responsible Party and Date Due
4.5	Pre-Eligibility and Enrollment Services		
	<p>Consultant Pre-Eligibility/Enrollment Services are intended to provide information, support, guidance, and/or assistance to individuals during the Medicaid eligibility process, which includes both financial and medical components. During this phase, consultants will</p> <ul style="list-style-type: none"> • Meet with the participant for an initial orientation and enrollment meeting; • Inform, support, and assist as necessary with the requirements for establishing the LOC; • Assist with financial eligibility application and paperwork as needed; and • Verify that the county ISD office of the HSD has completed a determination that the individual meets financial and medical eligibility to participate in the Mi Via Waiver program. 	<p>Based on record review, the Agency did not maintain a complete and confidential case file at the administrative office for 23 of 33 participants.</p> <p>Review of the Agency’s participant case files revealed the following items were not found, incomplete, and/or not current:</p> <ul style="list-style-type: none"> • Evidence the consultant explained to the participant what goods and services are covered in the Mi Via Program was not found. (Individual #2, 3, 5, 6, 8, 9, 10, 11, 12, 14, 15, 17, 19, 20, 21, 22, 23, 24, 25, 28, 29, 32, 33) 	<p>Provider: State your Plan of Correction for the deficiencies cited in this tag here: →</p> <p>Provider: Enter your ongoing Quality Assurance/Quality Improvement processes as it related to this tag number here: → </p>

Appendix A:

**Service Descriptions in Detail 2009 Waiver
Renewal**

CONSULTANT/SUPPORT GUIDE

PRE-ELIGIBILITY/ENROLLMENT SERVICES

II. Scope of Service

Consultant pre-eligibility/enrollment services are delivered in accordance with the individual's identified needs. Based upon those needs, the consultant provider selected by the individual shall:

A. Assign a consultant and contact the individual within five (5) working days after receiving the PFOC to schedule an initial orientation and enrollment meeting;

B. The actual enrollment meeting should be conducted within 30 days. Enrollment activities include but are not limited to:

1. General program overview including key agencies and contact information;

2. Discuss medical and financial eligibility requirements and offer assistance in completing these requirements as needed;

3. Provide information on Mi Via participant roles and responsibilities;

4. Discussion of Employer of Record (EOR) including discussion and possible identification of an EOR and completion of the EOR information form;

5. Review the processes for hiring employees and contractors and required paperwork;

<p>6. Review the process and paperwork for hiring Legally Responsible Individuals (LRI) as employees;</p> <p>7. Discuss the background check and other credentialing requirements for employees and contractors;</p> <p>8. Referral for accessing training for the GCES <i>on-line</i> system; and to obtain information on the Financial Management Agency (FMA); and</p> <p>9. Provide information on the Service and Support Plan (SSP) including covered goods and services, planning tools and community resources available.</p> <p>Mi Via Consultant Guide (4/12) pg. 16 Mi Via Consultant Guide (4/12) pg. 31 Mi Via Consultant Guide (4/12) pg. 33</p>		
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4.6	On-going Consultant Functions		
	<p>After eligibility has been verified, consultants assist the participant with virtually every aspect of the Mi Via program. The extent of assistance is based upon individual participant needs, and may include (but is not limited to) help and guidance related to</p> <ul style="list-style-type: none"> • Understanding participant and EOR roles and responsibilities; • Identifying resources outside the Mi Via program, including natural and informal supports, that may assist in meeting the participant's needs; • Understanding the array of Mi Via covered supports, services, and goods; • Developing a thoughtful and comprehensive SSP/budget that includes services and supports, covered by the Mi Via program, to address the needs of the participant; • Developing, documenting and submitting an appropriate SSP/budget request to implement the SSP/budget; • Employer-related activities such as identifying an EOR, finding and hiring employees and contractors, and completing all documentation required by the FMA; • Identifying and resolving issues related to the implementation of the SSP/budget; • Assist the participant with quality assurance activities to ensure implementation of the participant's SSP/budget, and utilization of the authorized budget; and • Recognizing and reporting critical incidents, including abuse, neglect, exploitation, emergency services, law enforcement involvement, and environmental hazards. <p>Consultants will contact the participant at least once a month for a 'check-in' and meet face-to-face with the participant at least once every three (3) months to</p>	<p>Based on record review the Agency did not maintain a complete and confidential case file at the administrative office for 7 of 33 participants.</p> <p>Review of the Agency's participant case files revealed the following items were not found, incomplete, and/or not current:</p> <ul style="list-style-type: none"> • Authorized Agent Acknowledgement Form (#32) • Guardianship Documentation (#7, 16, 17) <p>Monthly Contacts</p> <ul style="list-style-type: none"> • Individual #17- none found for June 2014 • Individual #21- none found for July 2014 <p>Quarterly Visits</p> <ul style="list-style-type: none"> • Individual #17 –none found for July 2014 • Individual #21 –none found for January 2015 • Individual #29 –none found for August 2014 <p>Documentation for Reimbursement</p> <p>Individual #11 March 2014</p> <ul style="list-style-type: none"> • Documentation for Quarterly visit on 3/19/2014 did not contain the following required element: <ul style="list-style-type: none"> ➢ Actual time spent with the eligible recipient for reimbursement. <p>June 2014</p> <ul style="list-style-type: none"> • Documentation for Monthly contact on 6/15/2014 did not contain the following required element: <ul style="list-style-type: none"> ➢ Actual time spent with the eligible recipient for reimbursement. 	<p>Provider: State your Plan of Correction for the deficiencies cited in this tag here: →</p> <p>Provider: Enter your ongoing Quality Assurance/Quality Improvement processes as it related to this tag number here: → </p>

<ul style="list-style-type: none"> • Review spending patterns; • Review and document progress of SSP/budget implementation; • Document the usage and effectiveness of the 24 hour Emergency Backup Plan; • Document the purchase of goods; • Review and document the progress of the SSP/budget implementation; and • Document the usage and effectiveness of the 24 hour emergency backup plan. • revisions. <p>NMAC 8.314.6.12, Record Keeping and Documentation Responsibilities</p> <p>NMAC 8.302.1.17 NMAC - Record Keeping and Documentation Requirements</p> <p>NMAC 8.302.1 NMAC - General Provider Policies</p> <p>New Mexico Human Services Register Vol. 34, No 10 March 14, 2011 Pg. 8</p> <p>Mi Via Consultant Guide (4/12) pg. 31</p> <p>Mi Via Consultant Guide (4/12) pg. 63 – Incident Management Process for Aged & Disabled and Brain Injury</p> <p>NMAC 7.1.14, Abuse, Neglect, Exploitation, Suspicious Injury and Unexpected Death Reporting, Intake, Processing and Training Requirements for Community Based Service Providers</p> <p>Mi Via Consultant Guide (4/12) – Appendix L, Pg. 107 – Documentation of Services Policy</p> <p>State of NM, DOH, DDSD Terms of the Provider Agreement</p>	<p>July 2014</p> <ul style="list-style-type: none"> • Documentation for Quarterly visit on 7/26/2014 did not contain the following required element: <ul style="list-style-type: none"> ➢ Actual time spent with the eligible recipient for reimbursement. <p>August 2014</p> <ul style="list-style-type: none"> • Documentation for Monthly contact on 8/13/2014 did not contain the following required element: <ul style="list-style-type: none"> ➢ Actual time spent with the eligible recipient for reimbursement. <p>December 2014</p> <ul style="list-style-type: none"> • Documentation for Monthly contact on 12/8/2014 did not contain the following required element: <ul style="list-style-type: none"> ➢ Actual time spent with the eligible recipient for reimbursement. 	
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6.3	Participant's Budget-Related Authority		
	<p>Participant's Budget-Related Authority There are three (3) elements to the authority participants have related to their budgets budget making authority, employer authority, and budget spending authority.</p> <p>Participant Budget-Spending Authority Participants have authority to expend waiver funds for services through an AAB that shall be expended on a monthly basis over the course of the budget year and according to the participant's approved SSP/budget.</p> <p>Employer Authority The participant (or the participant's representative) is the common law employer of service providers. The FMA serves as the participant's agent in conducting payroll and other employer-related responsibilities that are required by Federal and State law.</p> <p>Participant Decision-Making Authority Participants shall have authority to do the following</p> <ul style="list-style-type: none"> • Complete the employer paperwork to be submitted to the FMA. Participants who do not plan to hire employees are not required to complete employer paperwork, but the program advises that all participants take this step. Participants frequently change their plans about hiring employees during the course of their SSP/budget year, and completing this process often takes several weeks. Getting the employer paperwork out of the way at the beginning of the year may make future changes easier; • Determine the amount paid for services within the State's limits; • Schedule the provision of services; • Specify service provider qualifications of the participant's choice, consistent with the qualifications specified in the Mi Via regulations and the service standards in ; • Specify how services are provided, consistent with the Mi Via regulations and the 	<p>Based on record review, the Agency did not maintain a complete and confidential case file at the administrative office for 1 of 33 participants.</p> <p>Review of the Agency's participant case files revealed the following items were not found, incomplete, and/or not current:</p> <ul style="list-style-type: none"> • Proof that recipient received a copy of their approved Service and Support Plan (SSP) and budget. (#11) 	<p>Provider: State your Plan of Correction for the deficiencies cited in this tag here: →</p> <p>Provider: Enter your ongoing Quality Assurance/Quality Improvement processes as it related to this tag number here: → </p>

<p>service standards in ;</p> <ul style="list-style-type: none"> • Identify service providers and vendors and refer them to the FMA for enrollment; • Arrange to have service providers paid for their services by ensuring that all proposed employees and service providers complete all FMA required paperwork, including a criminal background check when necessary. Although services may be provided before the FMA enrollment process is completed, payment for services cannot be made until paperwork is complete and submitted to the FMA; • Review, approve and submit timesheets to the FMA within established timeframes. Timesheets may be submitted to the TPA by fax or through GCESon-line. Failure to submit timesheets within the required timeframes could result in employees not being paid; • Approve payment, according to the AAB, for waiver services and goods identified in the approved SSP. The participant must submit an invoice or receipt from a vendor for any item he/she has planned and budgeted to purchase. • Participants cannot be reimbursed directly for any services and goods or supports; • The participant shall follow the AAB; • The participant shall work with the FMA to have all employees, providers and vendors approved and enrolled prior to delivery or provision of any service or good; and • The participant shall be accountable for the use of Mi Via funds. <p>New Mexico Human Services Register Vol. 34, No 10 March 14, 2011</p>		
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1A26	Employee Abuse Registry / Consolidated Online Registry		
	<p>7.1.12.6 OBJECTIVE The objective of this rule is to implement the Employee Abuse Registry Act. The rule is intended to provide guidance as to the rights and responsibilities under the Employee Abuse Registry Act of providers, employees of providers, the department of health and the adult protective services division of the department of aging and long term services, and the public including recipients of care and services from providers.</p>	<p>Based on record review, the Agency did not maintain documentation in the employee's personnel records that evidenced inquiry to the Employee Abuse Registry prior to employment for 4 of 4 Agency Personnel.</p> <p>The following Agency Personnel records contained evidence that indicated the Employee Abuse Registry was completed after hire:</p> <ul style="list-style-type: none"> • #300 – Date of hire 6/16/2014. Completed on 2/10/2015. • #301 – Date of hire 6/1/2010. Completed on 2/25/2011. • #302 – Date of hire 6/11/2012. Completed on 2/10/2015. • #303 – Date of hire 9/25/2014. Completed on 2/11/2015. 	<p>Provider: State your Plan of Correction for the deficiencies cited in this tag here: →</p> <p>Provider: Enter your ongoing Quality Assurance/Quality Improvement processes as it related to this tag number here: → </p>

Date: May 13, 2015

To: Gale Idstein, Director/Consultant
Provider: CNRAG, Inc. (dba Care Network Resources Group)
Address: 225 E Idaho Avenue
State/Zip: Las Cruces, New Mexico, 88005

E-mail Address: gidstein@cnragusa.com

CC: Roxanne Gates, Owner

E-Mail Address rgates@cnragusa.com

Region: Statewide
Survey Date: February 6-11, 2015

Program Surveyed: Mi Via Waiver
Service Surveyed: Mi Via Consultation Services
Survey Type: Initial

Dear Ms. Idstein:

The Division of Health Improvement/Quality Management Bureau has received, reviewed and approved the supporting documents you submitted for your Plan of Correction. The documents you provided verified that all previously cited survey Deficiencies have been corrected.

The Plan of Correction process is now complete.

To maintain ongoing compliance with standards and regulations, continue to use the Quality Assurance (self-auditing) processes you described in your Plan of Correction.

Consistent use these Quality Assurance processes will enable you to identify and promptly respond to problems, enhance your service delivery, and result in fewer deficiencies cited in future QMB surveys.

Thank you for your cooperation with the Plan of Correction process, for striving to come into compliance with standards and regulations, and for helping to provide the health, safety and personal growth of the people you serve.

Sincerely,

Tony Fragua

Tony Fragua
Health Program Manager/Plan of Correction Coordinator
Quality Management Bureau/DHI

Q.15.3.MVW.41586077.Statewide.INT.09.15.133