



I.M.P.A.C.T. Annual Plan

Fiscal year 2020 - 2021

Presented by the I.M.P.A.C.T. Management Team

2021

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I.M.P.A.C.T.

INTRODUCTION

Organization Description and History

Since 1978, I.M.P.A.C.T. has provided: quality residential care for the developmentally disabled and/or mentally ill, assisted living services, community-based advocacy and supports, and Prevention Education Programs in St. Clair County. These services are provided to people with complex developmental disabilities, mental health disorders, medical and health-related disabilities, and the elderly in need of assisted living.

Residential care services are currently provided throughout St. Clair County including: 6 residential 6-bed facilities for the developmentally disabled, one residential 20-bed facility for the elderly, handicapped, developmentally disabled and mentally ill, one 15-bed supported living facility for semi-independent ambulatory individuals and 5 “home of your own” supported living arrangement locations. These services are provided on a 7 day per week, 24 hours per day basis.

The CISD (Community Integration and Supports Department) offers a variety of opportunities for individuals with disabilities to receive services within the community in which they live. These include Community Living Supports (CLS) in St. Clair County and Respite services in St. Clair and Sanilac Counties.

Prevention Education Services are provided throughout St. Clair County. The primary goal of the Prevention Department is deterring individuals of all ages from: using or abusing illegal drugs, prescription drugs, tobacco and alcohol as well as providing skills and tools to resist and cope with the pressures that cause people to get involved with any of the aforementioned substances. The Certified Prevention Specialists lead educational groups for individuals of all ages including such groups as: domestic violence cessation, life skills, drug education, anger management, parenting and more.

Participation in community Coalition Groups such as SPEAK (Substance Prevention through Early Action and Knowledge) and the Adolescent Services Workgroup are ways I.M.P.A.C.T.’s Prevention Specialists stay connected with the community.

Vision Statement

I.M.P.A.C.T. will provide the highest quality community-based residential, community support services and behavioral health services to people with complex needs through innovative, individualized services, and natural supports.

Mission Statement

The mission of Incorporation to Maximize Personal Achievement with Community Training is to provide quality residential and behavioral health opportunities and community-based services that improve quality of life, further personal growth, improve functional skills, promote consumer empowerment, and enrich the lives of the people we serve through information, referral, advocacy, prevention and treatment.

Core Values

I.M.P.A.C.T. believes that its board, management, and service staff must be committed to excellence and stay true to the following “core values”:

Respect for individuals
Respect for individual choice
Community-based supports
Innovation
Quality Staff and Teamwork
Continuous Improvement
Cultural Competency

Service Principles

The design, implementation, monitoring, and evaluation of all services must be guided by principles that include:

Individuals* are actively involved in and determine the design and implementation of their service plan.

Individuals have access to a system of comprehensive and integrated, community-based, best practice treatment and support services.

Services promote natural and community supports including family, friends, peers and other citizens.

Services are relevant to the individual’s age, abilities, and life goals.

Services demonstrate respect for the rights and dignity of all individuals.

Services incorporate the culture and value system of the individual.

Individual choice, satisfaction, safety and positive outcomes are the focus of services.

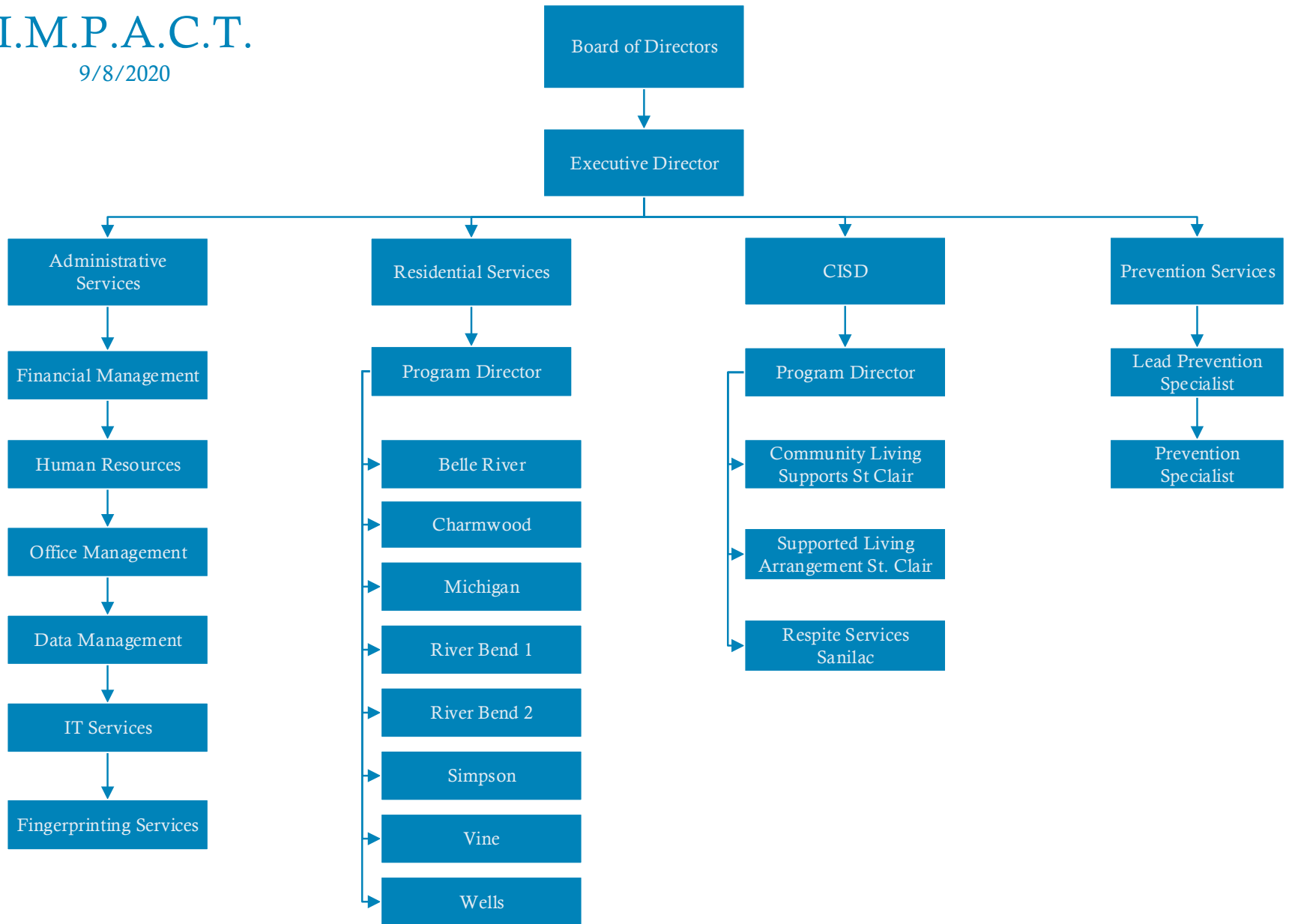
Individuals are offered the support and services necessary to be successful where they live, work and play.

Services are designed to foster communities where all members are included, respected and valued.

*The word “individual” may mean the consumer directly or the consumer’s guardian.

I.M.P.A.C.T.

9/8/2020



QUALITY IMPROVEMENT PLANNING

Scope

This Quality Improvement Plan will focus on efforts to refine and enhance the following primary components:

- Accessibility and Person-Centered Care
- Business/Financial Planning
- Staff Education and Training
- Risk Management
- Cultural Competency
- Technology

Organizational Decision-Making and Communication

Quality consumer outcomes and continuous process improvement are the foundation of the organizational decision-making and communication process of I.M.P.A.C.T.

The process begins with researching the community need, learning what services the consumers want, determining if the services fit within the mission of the Agency, evaluating our organizational capacity to effectively perform services, identify any process improvements, and then setting goals that are monitored and reported on.

The decision-making process requires input and information from all levels of the organization.

Examples of methods used to gain input include:

- Annual consumer surveys and through direct interaction.
- Annual stakeholder surveys and direct interaction, whenever possible.
- Input from staff is obtained from monthly staff meetings, staff injury reports, exit interviews, post-training survey and incident reports.
- Community needs assessments done by area agencies, i.e. United Way, St. Clair County Health Department, and Community Action Agency. Collaboration and interaction with other Human Services Agencies.

The input is disseminated to one of the following committees for evaluation, as well as the Board of Directors and other interested parties:

- Management Team
- QI Committee
- Safety Committee
- Residential Supervisors
- Policy Committee

The input is continually analyzed, and the analysis is integrated into the business practices of the organization. The input is analyzed to help determine if the organization is meeting the consumer and stakeholder needs, providing the opportunity for the highest quality outcomes, and identifying potential new opportunities for growth and development.

Information is gathered, and the decisions made are communicated back to the Board of Directors, stakeholders, persons served and staff using meeting minutes and the strategic plan.

Organizational Capacity and Resources

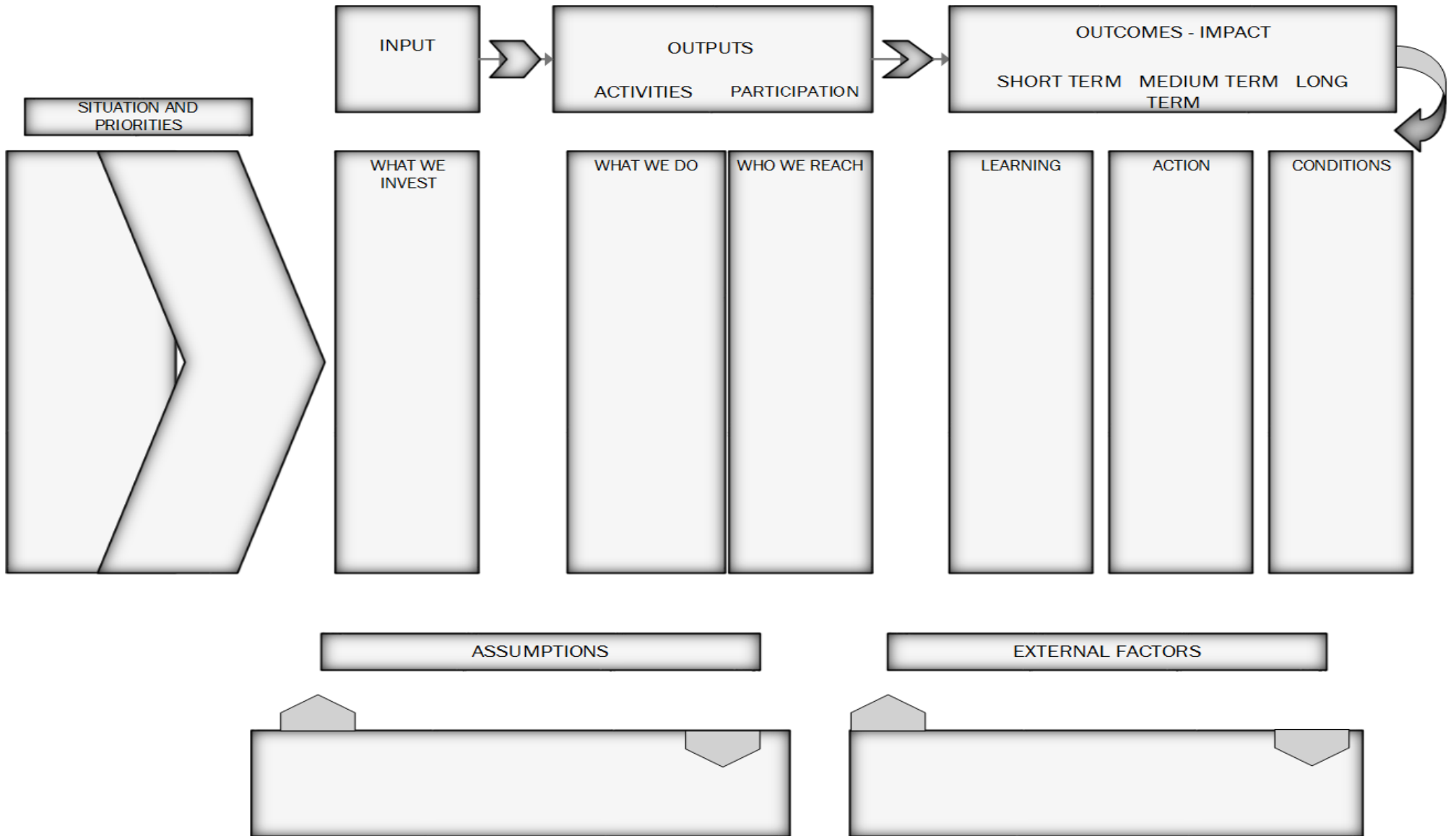
With the guidance of the Board of Directors and in keeping with our mission, the Administration, Management and staff of I.M.P.A.C.T. will focus efforts on challenging ourselves not to be satisfied with our current status but seek to improve in our ability to provide sustainable quality

residential, community supports and behavioral health opportunities through information, referral, advocacy, prevention and treatment using data-driven decision-making. This approach requires building on existing alliances and the development of new partnerships with various community organizations, as well as retaining qualified staff and challenging them to meet and exceed established goals.

Logic Models for Service Components

The Agency will accomplish goals by utilizing the following components of a logic model as demonstrated in the following graphic model.

1. Defining the situation
2. Setting its priority
3. Investing all necessary resources (INPUT)
4. Accomplishing all needed activities and participants (OUTPUT)
5. Determining the short, medium and long-term OUTCOMES



ENVIRONMENTAL SCAN

Regional Demographic Profile

St. Clair County continues to be a primarily rural community. The current population is 159,128 (2019 US Census Bureau). Since the 2010 census, the population of St. Clair County has decreased by 2.4%, still St. Clair County remains the 13th most populated county in Michigan out of 83 counties total.

Prior to the onset of the COVID-19 Pandemic, the unemployment rate was 5.7% (March 2020). The Michigan Governor issued a Stay Home/Stay Safe Executive Order to stop the spread of the virus. This led to the closing of all non-essential businesses and sky rocketed unemployment rates. Highest point in April was 29% and May 25.6%. The rate began to decrease in June (17.8%) when the Executive Order was lifted, and some people started to return to work according to the MI Safe Start Plan.

The gender distribution for St. Clair County is 49% male and 51% female. The median age is 41 years for both sexes. Persons under the age of 5 years is 6%; persons under 18 years is 18% and persons 65 years and older is 14%.

There are three inter-related population stressors affecting this region. These include poverty 13.3%, disability 12.5%, and non-participation in the labor force 39.6% (individuals 16 and older).

The cultural make-up of the region consists of 94% White, 2% Hispanic, 2% African American and two or more races 2%.

St. Clair County is among the 24 Michigan counties categorized as “high risk” in the national opioid epidemic. Counties are categorized as “high risk” if they have both high opioid overdose mortality rates, and low capacity to treat opioid addiction.

Substance abuse is considered a pressing and prevalent issue in St. Clair County. Six in ten (62.0%) adults believe there is a prescription drug abuse problem in St. Clair County. Four in ten (44.0%) know someone who has taken prescription medication to get high. Opiate prescriptions and opiate units per residents of St. Clair County are both at a rate higher than the state. In 2019 there were 39 drug overdose deaths recorded in St. Clair County.

The self-harm and interpersonal violence mortality rates for females in St. Clair County (10.4%) is higher than state (10.0%) and national (9.0%) rates. For men in St. Clair County, the rate (31.2%) is lower than within the state (32.7%), but higher than national (30.9%) rate.

Excessive drinking is 23% in St. Clair County, compared to the state average of 21%.

Additionally, the 2018 MiPHY (Michigan Profile for Healthy Youth) data report shows that St. Clair County has higher than state and national rates of students who currently vape (26.8%) of 9th grade students and (37.5%) of 11th grade students, which is more than double the rate in the U.S. (14.1%). In 2018, the United States Surgeon General officially declared e-cigarette use among youth an epidemic in the United States.

Assessment of Community and Organizational Assets

Community and Organizational Strengths and Opportunities

	Strengths	Opportunities
Residential Services	<ul style="list-style-type: none"> • National Accreditation (CARF) • Staff provide Quality Care • Safety and Risk Management Programs • Continuous Quality Improvement Programs • Facility Maintenance • Positive Utilization Reviews • Willing to try new ways of serving consumers • Flexible long term Supervisory and Management staff • Diversity of Services and a continuum of care • Program Educator • Ongoing training and education for staff • Adequately funded for current services • Supportive and involved Board of Directors 	<ul style="list-style-type: none"> • Diversify the variety of services for assisted living • Additional technology savings • Member of the St. Clair County Provider Alliance • Advocate for increased funding to support staff wage increases
	Strengths	Opportunities
Prevention Services	<ul style="list-style-type: none"> • National Accreditation (CARF) • Programs used are all evidence-based, best practice • Dedicated, creative staff with skills to successfully develop and implement prevention programs and services • Greater financial stability to assist with program expansion • Experience working with a diverse population including prisoners • Strong, established community collaborations • Proven record of quality prevention performance • Certified Prevention Specialists • Strong IT support to assist in providing virtual meetings (Zoom), access to online surveys, training materials for participants • Supportive and involved Board of Directors 	<ul style="list-style-type: none"> • Expand evidence-based programs • State focusing on elderly population and ENDS (Electronic Nicotine Delivery Systems) • Expand programs in the Intervention Center, DHS Youth Services • Capability to remodel current office space into a larger meeting room
Community Integration	<ul style="list-style-type: none"> • National Accreditation (CARF) • Staff provide Quality Care • Safety and Risk Management Programs • Continuous Quality Improvement programs • Willing to try new ways of serving consumers • Ongoing training and education for staff • Diversity: Sanilac Respite, CLS, SLA and DHS Chore Services. • Supervisors in St. Clair and Sanilac provide oversight and training. • Supportive and involved Board of Directors 	<ul style="list-style-type: none"> • More respite cases with new staff • Diversify the variety of services for community integration. • Advocate for increased funding to support staff wage increases

Community and Organizational Weaknesses and Threats

	Weaknesses	Threats
Residential Services	<ul style="list-style-type: none"> • Single source funding • Increasing costs for healthcare benefits • Wages not competitive with current job market • Saturated service market for staff recruitment • Changing Medicaid rules (HCBS) • No payment for empty beds 	<ul style="list-style-type: none"> • Rate changes • Open beds • Staff vacancies • Increased contract requirements with no corresponding rate increase • Shrinking job candidate pool • Competition with other businesses • Increased cost of living • Staff burn out due to over time • Increased risk of injury or error for both staff and resident due to staffing shortage
Prevention Services	<ul style="list-style-type: none"> • Loss of revenue from State • Need to develop expanded services to other community organizations • Need to diversify funding • Limited staff to cover extended absences • Virtual meetings are challenging for many participants • Limited meeting space to accommodate social distancing requirements related to COVID-19 	<ul style="list-style-type: none"> • Decrease of available funding • Loss of units due to staff absences • COVID-19 could cause temporary stoppage of services
Community Integration	<ul style="list-style-type: none"> • Single source funding • Increasing costs for healthcare benefits • Saturated service market for staff recruitment • Wages not competitive with current job market 	<ul style="list-style-type: none"> • Increased contract requirements with no corresponding rate increase • Increased cost of living • Multiple provider competition • Potential for financial loss if break-even point is not met in the CLS or Sanilac Respite programs • COVID-19 could cause temporary stoppage of services for CLS and Sanilac Respite

ONGOING PLANNING AND ACTION PLAN

INTRODUCTION

Given the continuing economic challenges and changing public mental health environment, I.M.P.A.C.T. senior management felt strongly there was a need to continuously review and update our existing annual plan by going through a process of reviewing the primary component of strategic planning annually:

- Accessibility
- Business
- Training
- Risk Management
- Cultural Competence
- Technology

ACCESSIBILITY PLANNING

I.M.P.A.C.T. has a written policy governing accessibility. I.M.P.A.C.T. believes that there should be no wrong door when entering services. It shall be the policy of the I.M.P.A.C.T. Board that accessibility is a key factor in the decision-making process of the Agency. Accessibility Planning will be done to improve the quality of life for our consumers and their families. I.M.P.A.C.T. believes ensuring accessibility at all levels and in all categories is an ongoing process.

Consistently updating technology, promoting ongoing evaluation, improvement of standard practices, and systematically reassessing the needs of consumers and staff by obtaining their input regularly are some of the ways we ensure quality services and the removal of barriers of service. The formal Accessibility Plan is separate from this document and is reviewed and updated bi-annually by the Management Team.

A full accessibility plan is prepared containing the following components:

- Communication Barriers and Assistive Technology
- Physical and Environmental Barriers
- Transportation Barriers
- Financial Barriers
- Program Access Barriers

The plan has been reviewed by the management team. Several of the goals will continue as it was decided they were important enough to remain a primary focus for our action plan. The Communication and Physical Plant surveys from ADA will be reviewed in 2020 and again in 2022. Many of our primary plan action items are dependent on the availability of funds. The financial outlook for I.M.P.A.C.T. continues to be positive, but must, always, be monitored and revised according to State funding trends.

BUSINESS PLAN

Corporate Compliance Responsibility

The Board of Directors, Management and staff of I.M.P.A.C.T., as a private non-profit corporation providing quality services to public mental health, substance use disorder and individuals with developmental disabilities, understands that the philosophy and obligation of

each employee is to conduct their job duties in a legal, moral, ethical and cost-effective manner.

Corporate Financial Responsibility and Stability

The financial structure of the organization:

- Oversight from the Board of Directors
- Executive Director - Assessment, Review and Acknowledgement of financial statements, preparation of bank deposits for prevention services revenue, manage all changes based on financial reviews.
- Duties of the Financial Manager include: Preparation of bills for PIHP, CMH, and others as needed. Enters invoices, receipts, deposits, verifies billing. Reconciliation and preparation of financial statements and reports.
- Office Manager – prepares deposits for residential services revenue, prepares billings for residential services, reconciles bank deposits, makes bank deposits.
- Receptionist – accurately record sessions and cancellations.
- Administrative Assistant - prepares billings for CLS, Respite and HOYO services.

Once a year, the organizational budget is prepared by the I.M.P.A.C.T. management team based on the actual revenues and expenditures for three preceding fiscal quarters and annualized. Adjustments are then made to increase or decrease revenue and expenses based on expected changes. (i.e. cost of healthcare, raise in wages, reduced programming, capital improvements and contract bids) The budget is reviewed and approved by the Board of Directors at the beginning of the fiscal year. The annual audit provides an overview of our net assets, program funding and costs, cash in the bank, and investments.

I.M.P.A.C.T. is currently financially stable with a 20% cash reserve. This is a decrease from 23% the previous year. While we have increased our cash and investment balances by \$40,000 since this time last year, we have also had a significant increase in monthly expenditure by \$87,000. This increase is directly related to a State mandated direct care worker wage increase of \$2 and aggressive retention strategy designed to do the same in response to the COVID-19 pandemic. Effectively increasing wages for some staff by \$4 per hour. At this time, the increase is set to expire at the end of this fiscal year.

Human Resources

As with any successful corporation, employees are our greatest asset. I.M.P.A.C.T. strives to offer a competitive wage and benefit package. Our personnel policy manual gives complete and clear instruction and information on how I.M.P.A.C.T. manages its human resources. I.M.P.A.C.T. recruits new staff based on job description qualifications. A job offer is made and is contingent upon drug testing, criminal records checks (both State and Federal for residential and prevention), reference checks, employment history checks and driving record checks.

All new staff receives an orientation designed to educate and inform them of the policies and procedures of I.M.P.A.C.T. Individuals hired for positions in our residential department are trained using the State-approved “Toolbox” that covers all aspects of specialized residential care.

Staff satisfaction is measured during orientation, monthly staff meetings as well as at the time of termination. The management team maintains an open-door policy for the staff to assist with problems and complaints in a timely manner.

Information Technology

I.M.P.A.C.T. has maintained its technology applications at a very high level. It has given us the ability to increase efficiency, effectiveness, reduce costs, improve communications, and better apply national standards of practice.

In order to continue to use technology in the most effective manner, I.M.P.A.C.T. has developed and completed a HIPAA Information Security Risk Assessment Checklist and Information Security Plan. As with all the plans I.M.P.A.C.T. has completed, it includes the practice, analysis of the systems, Plan of Correction (if needed), responsible party, timeline and follow up. I.M.P.A.C.T. will review the plan bi-annually or as the system changes.

I.M.P.A.C.T. will also develop a replacement plan to assure the technology remains current and viable.

I.M.P.A.C.T. IT has determined that there is a need to replace (6) older computers (residential supervisors). I.M.P.A.C.T. IT would like to build a new Domain Controller as a virtual machine at Riverbend to replace the aging physical server the Domain Services are housed in. IT is looking to develop and test pilot a new IMDATA data management system in the office 365 cloud using PowerApps. This will replace the current on premise IMDATA access application. We will also be rolling many of our staff data entry tasks into the new IMDATA application such as Daily Logs, Staff Log and Health Care Chronological forms used by staff at the residential locations.

Business Goals

1. Goal: Staff Retention

Objective:

Develop a plan for staff recruitment and retention

*Sign-on bonus

*Referral bonus

*Competitive benefit package

*Input from staff via monthly staff meetings

*Recruitment events/job fairs

*Staff appreciation (birthday gift cards, holiday treats, Christmas gift card, etc.)

*Service Recognition

*Job shadows

*Orientation program

*Training program

*Contingent staff

*New hire surveys

Performance Indicator: Monitor data collected from HR at monthly management meetings

Who applied to: All current and new agency staff

Time of measure: Monthly; quarterly

Data Source: HR report

Performance Target:

1. Staff retention greater than 80%. Measured monthly.
2. Staff turnover less than 50%. Measured monthly for new hires and quarterly for all staff.
Data will include length of employment and reason for leaving.

2. Goal: Manage transition to the new HCBS Medicaid rules

Objective: Compliance with HCBS Medicaid rules

- *Know, understand and implement rules as currently written
- *Participate in survey process for Heightened Scrutiny
- *Implement approved corrective action plans
- *Ongoing monitoring through Utilization Management reviews
- *Provide ongoing staff education

Performance Indicator: Site visits and Utilization Management survey results

Who applied to: All residential locations and consumers receiving HCBS

Time of measure: Reviewed at monthly supervisor meetings and quarterly Quality Improvement Committee meetings

Data Source: Utilization Management and Satisfaction Survey results obtained by the Program Director

Performance Target: 90%

3. Goal: 24/7 Dad Parenting Development Program

Objective: Offer a quality program supplement to address the community's need for services helping fathers be more involved with the lives of their children.

Performance Indicator: Offer one 12-week session with *9-12 fathers participating each quarter Use data compiled from Pre- and Post-tests to determine effectiveness of program.
*Number of participants will vary depending on COVID-19 restrictions.

Who applied to: All active class participants

Time of measure: Reviewed at quarterly Quality Improvement Committee meetings

Data Source: Pre-test and Post-test results

Performance Target: Post-test score results will be 4.2 or higher.

4. Goal: Replace outdated and “end of life” residential supervisor computers, build a new Domain Controller at River Bend and research the development of a new data management system using PowerApps for the residential department.

Objective: IT staff will research replacement computers, equipment for Domain Controller and PowerApps

Performance Indicator: Updated computers will be purchased and installed. Domain Controller will be built and start a test pilot of the new version of IMDATA powered by Office 365 PowerApps.

Who applied to: Updated computers at Belle River, Charmwood, Michigan, Simpson, Vine and Wells group homes. New Domain Controller at River Bend

Time of measure: 09/30/21

Data Source: IT will take point and provide updates at Management Meetings

Performance Target: Updated reliable and faster computers. Reliable Domain Controller at River Bend. Updated and secure data base for residential forms.

5. Goal: Capital Improvement Plan

Objective: Rolling 5-year plan

Performance Indicator:

- Maintain inventory of existing capitol assets
- A listing of the capital maintenance projects or equipment to be purchased (updated as needs arise)
- Rank projects in order of preference
- Financing plan for the projects
- A timetable for the completion of the project
- Justification for the project
- Explanation of expenses for the project

Who applied to: Management Team, Operations Coordinator, Group Home Supervisors

Time of measure: Reviewed monthly by the Management Team. Updates provided to the Board of Directors.

Data Source: Capital asset inventory, list of prioritized projects, resources needed (in-house vs contracted), project estimates.

Performance Target: Successful implementation of capital budget plan should allow the Agency to reach and maintain a cash reserve above 25%.

Competency-based Training Plan

The Board of Directors and Management of I.M.P.A.C.T. will provide effective and efficient leadership so that the Agency can achieve its mission and vision. I.M.P.A.C.T. will carefully plan and monitor the efficiency and effectiveness of its organizational structure and management practices to reflect our commitment and responsiveness to the individuals we serve. I.M.P.A.C.T. will train the workforce so there is an understanding that the philosophy and obligation of each employee is to conduct their job duties in a legal, moral, ethical and competent manner.

Corporate Compliance Training

The Board of Directors, Management and staff of I.M.P.A.C.T. understand that the philosophy and obligation of each employee is to conduct their job duties in a legal, moral and ethical manner. It is the policy of I.M.P.A.C.T. to have a corporate compliance program that includes a plan, complaint process training and updates as needed.

The I.M.P.A.C.T. Corporate Compliance policy 01-A-020 clearly defines the training requirements for all staff as it relates to corporate compliance. The entire workforce is to be trained at hire on the corporate compliance policy, as well as gain an understanding of fraud and understand the Agency's code of ethics. Annually, the staff will reaffirm their acceptance of the code of ethics and review the corporate compliance policy.

Workforce Development and Training

All successful businesses thrive due to the strength of its workforce. I.M.P.A.C.T. is no exception. Human Capital are our greatest strength and our greatest challenge. The efforts required to retain and further strengthen our workforce are our supreme strategic challenge. Some of the tasks we need to refine are:

1. Develop a staff recruiting and retention philosophy that encourages current and future staff to see their job as a career.
2. Reviewing the standards of performance and job descriptions to accurately reflect the expectation of the job and the expected knowledge and skills to perform the job effectively.
3. Training opportunities and recertification schedule.
4. Create professional development plans during each evaluation.
5. Supervise the training of everyone to ensure they perform to the expected standards.
6. Monitor and report on progress at bi-monthly Management Meetings.

The Program Educator assists with the training of all new hires. The training plan includes a competency-based training using the demonstration training model, whenever possible. This means that before a staff person can perform a task alone, they must physically demonstrate to the trainer each of the techniques and processes involved in the task. We must also now comply with the training requirements from CMH which demand specific time frames for completion, face to face trainings at CMH and re-certifications at CMH. It is now an expectation of employment that prevention staff become and maintain certification as Prevention Specialists.

Cultural and Gender Competency

Cultural competence refers to an ability to interact effectively with people of different cultures. Cultural competence is comprised of four components: (a) Awareness of one's own cultural view, (b) Attitude towards cultural differences, (c) Knowledge of different cultural practices, and (d) cross-cultural skills.

I.M.P.A.C.T. embraces the principles of equal access and non-discriminatory practices in service delivery with a service delivery model that recognizes mental health as an integral and inseparable aspect of primary health care. Cultural competence is achieved by identifying and understanding the needs and help-seeking behaviors of individuals and families.

I.M.P.A.C.T. strives to be a culturally competent organization which designs and implements services that are tailored or matched to the unique needs of individuals, children, and families. Our practice is driven by client preferred choices, not by culturally blind interventions.

I.M.P.A.C.T. will continue to do our utmost to maintain a culturally aware environment by:

1. Providing education and training on cultural competency.
2. Strictly adhering to the Agency's policy on non-discrimination.
3. Supporting community effort at reducing the stigma regarding mental health issues.

RISK GOVERNANCE AND MANAGEMENT PLAN

Organizational Risk Assessment

Every two years, the Management and staff of I.M.P.A.C.T. perform an organizational risk management assessment to determine the areas of greatest risk that could negatively affect the Agency.

The general categories reviewed are:

- Administration
- Human Resources
- Residential
- Community Integration
- Prevention
- Facility Management
- Information Systems

Once the assessment and analysis are complete, an action plan is developed which includes timelines and responsible parties for each section. The action plan will be reviewed semi-annually during the management meetings for progress and updates.

The Information Security Risk Assessment Checklist and Information Security Plan will be separate from the Risk Management Plan and will be reported on at Management meetings.

The Information Security Risk Assessment will also include an evaluation of the HIPAA risks within our information system and a Disaster Recovery plan for our technology.

Corporate Compliance

The I.M.P.A.C.T. compliance program covers the specific compliance principles and components and activities the Agency performs as a healthcare entity. I.M.P.A.C.T. has established a Corporate Compliance policy (1-A-020), as well as an Ethical Conduct policy (1-A-030).

I.M.P.A.C.T. reviewed its corporate compliance plan in 2018 and believes it has been fully implemented which includes staff training. I.M.P.A.C.T. management team will provide a compliance report at the end of each fiscal year which will include:

1. The Team will analyze and, as needed, develop new methods for promoting compliance and identifying potential violations and for soliciting, evaluating and responding to complaints and reports of alleged non-compliance.
2. The Compliance Committee will periodically review the resources assigned to compliance efforts to assess their adequacy for maintaining the Compliance Program's ongoing effectiveness.
3. The Team will provide recommendations for Compliance Program improvement to the Board as part of the annual Report.

The reports will be included with the plan and be available each October.

Organizational Safety Plan

I.M.P.A.C.T.'s organizational safety plan is developed annually by the Safety Committee and presented to the Board of Directors annually for review. The Safety Committee's annual meeting is held in January when a report of goal progress and committee accomplishments is discussed. The full report is available with the Safety Committee minutes.

The Safety Committee meets bi-monthly. At each meeting, major incident reports received within that period are discussed, and a plan of correction for each incident is developed. The annual goals are monitored and reported each meeting and at management meetings.

In response to the COVID-19 pandemic, the Safety Committee assisted in the development of I.M.P.A.C.T.'s COVID-19 Preparedness and Response Plan. This plan was developed based on the recommendations and guidance of the CDC and MDHHS. All staff received training on the plan and the plan has been added to the new staff orientation program.

Safety Goals

Health and Safety Plan goals for FY 2021:

Goal

Objective: Reduction of high loss injury incidents

Strategy:

1. Evaluate work related injuries including action plans, debriefing, etc.
2. Make recommendations for education/training, equipment needs or policy changes related to the area of health and safety.
3. Identify work safety training needs, equipment or policies in response to identified causes and trends.
4. Coordinate with Agency Educator to present specialized safety related trainings.

5. Conduct annual Safety Inspections at each Agency location.
6. Consult with Accident Fund Safety Consultant to research information and/or conduct special staff trainings, etc.
7. Report on results as needed within the organization (management team, Q.I. Committee, Supervisor and staff meetings, etc.).
8. Summarize the results in the Annual Health & Safety Committee Report.

Outcome: An analysis of causes and trends will identify areas needing improvement to prevent similar events from reoccurring. This may include but is not limited to education/training, changes in policies/ procedures, and monitoring the changes to ensure they are effective.

Goal

Objective: Knowledge of Emergency Procedures

Strategy:

1. Research various methods for teaching and testing knowledge of emergency procedures, i.e. simulated tests, tabletop exercise, etc.
2. Make recommendations for needed equipment or materials to the Management Team.
3. Develop the various testing methods, i.e. written instructions, tests, supplies, etc.
4. In-service managers on how to implement the various testing methods.
5. Create a schedule that will rotate the various testing methods.
6. Schedule the Agency Educator to provide in-service training at quarterly staff meetings to conduct tests using various methods to test knowledge.
7. Report on results as needed within the organization (management team, Q.I. Committee and staff meetings, etc.).
8. Summarize the results in the Annual Health & Safety Committee Report.

Outcome: Staff and individuals served will be more knowledgeable and prepared in the event of an emergency.

Technology

The use of technology permeates all aspects of the Agency's activities including set goals for:

1. Communication
2. Database development
3. Electronic records
4. Assistive technology
5. Time and attendance keeping
6. Record storage
7. Security monitoring

I.M.P.A.C.T. has made a significant investment in hardware, software and human resources to advance our technology goals. The technology goals are set based on evolving the Agency's mission and creating quality improvements we wish to realize in all areas of our business.

1. IT staff have written a relational database specific to I.M.P.A.C.T. which provides financial reports, incident reports, utilization management, surveys and more. It is our intent to place important forms into this database to be completed by staff. This will eliminate paper forms and allow for gathering additional information related to quality improvement and effective operations.

2. Using the scanner, I.M.P.A.C.T. is scanning all historical records into computer files which are backed up daily.
3. Upgrade to the new Windows 10 operating system.
4. Most of the residential historical case records are now scanned and electronically stored, eliminating the need for physical record storage space.
5. Ongoing IT/HIPAA risk assessment.
6. Replace/Upgrade all 6 residential supervisor computers.
7. Replace/Upgrade Domain Controller at River Bend.
8. Start a test pilot of the new version of IMDATA powered by Office 365 PowerApps.

PROGRAM SERVICES AND SUPPORTS QUALITY IMPROVEMENT PLAN

I.M.P.A.C.T. is committed to systematic and continuous quality assurance and improvement of its processes, functions, and services. This commitment is a reflection of the agency's mission, values and service principles and is therefore included as an integral part of I.M.P.A.C.T.'s total planning and service delivery process.

Philosophy of the Quality Improvement Program

Supporting and improving the functioning levels and quality of life for the individuals we serve is the primary focus of I.M.P.A.C.T. We recognize that achievement of excellence in the services we offer to our consumers and enhancement of the environment in which we provide service is the responsibility of every employee. I.M.P.A.C.T. is committed to continuous quality improvement of its entire service delivery system. We encourage the people we serve, the community we serve, and our employees to assist us in our ongoing effort to improve both the effectiveness and efficiency of I.M.P.A.C.T.'s systems and services. I.M.P.A.C.T. maintains an ongoing quality improvement process in order to assure and improve both the effectiveness and efficiency of its systems and services.

I.M.P.A.C.T. has established, through its annual planning process, short-term quality improvement goals that support the achievement of our mission and purposes. These goals will allow us to flexibly respond to the changing needs and adapt to outcome information and quality improvement information.

Our annual planning process includes developing and implementing relevant and objective measurement systems to track consumers' satisfaction, program performance, consumers' progress toward person-centered goals, and ongoing monitoring, measurement, and improvement throughout the agency's service delivery system.

We invite the input of our consumers, stakeholders and personnel in all phases of our Continuous Quality Improvement process. Together we will continue to maintain I.M.P.A.C.T. as a preeminent, private, non-profit, human service agency that adds values to the community we serve by supporting and improving the lives of our consumers.

I.M.P.A.C.T. Organizational Quality Improvement Goals

The following goals were established by the Quality Improvement Committee for fiscal year 2020-2021. The QI Committee meets quarterly to report on the progress of the goals, the need to change, modify or add new goals based on the needs of the Agency and consumers.

Prevention: Alcohol & Other Drugs/Addictions

Goal: 100% of consumers will be given the opportunity to complete a Pre- and Post-test at the beginning and following completion of Alcohol & Other Drugs/Addiction classes

Objective: Pre- and Post-tests will help the Agency improve the quality of services and increase knowledge of the participants. Results may determine the need to modify how the material is communicated to increase retained knowledge

Performance Indicator: Pre- and Post-test results will be collected and analyzed on a quarterly basis and report to the Quality Improvement Committee

Who Applied to: 100% of all active consumers

Time of Measure: Quarterly

Data Source: Pre- and Post-test survey results will be completed by the Lead Prevention Specialists

Performance Target: On a scale of 1-5, 4+ consumers will report that services were helpful

Residential: Community Housing

Goal: Residents will participate in community volunteer activities annually and be offered weekly community inclusion activities

Objective: Increase access and participation in the residents' greater community

*Weekly meetings with residents to determine individual choice in community inclusion events and volunteer activities

*Annual resident survey to help guide activities for residents

*Minimum of 2 outings offered per week

*Volunteerism activities are done where clinically appropriate

Performance Indicator: Monitor data from supervisors and provide a summary report

Who Applied to: All residents* (*per choice and as clinically appropriate)

Time of Measure: Quarterly

Data Source: Reports from Group Home Supervisors are obtained by the Program Director

Performance Target: Two community volunteer activities annually and offer two weekly community inclusion activities

Goal: Minimize number of medication errors

Objective: Prevent injury to residents resulting from medication errors

*Staff training and education

*Annual recertification in medication administration and following any medication error

- *Use of QuickMAR
- *Extensive written policies on medication management
- *UM reviews that include an audit of medications

Performance Indicator: Monitor medication error reports

Who Applied to: All residents and staff

Time of Measure: Quarterly

Data Source: Medication error reports obtained by the Program Director

Performance Target: Zero Medication Errors

Goal: Resident Focused Services

Objective: Increase satisfaction

- *Weekly meetings with resident to discuss menus, outings, activities of their choice
- *Encourage to the best of their ability the selection of staff for the home
- *Follow up and develop appropriate action plans for areas of dissatisfaction
- *Education on Person Centered Planning, Recipient Rights, Customer Service

Performance Indicator: Survey Results

Who Applied to: All residents and guardians, designated representatives

Time of Measure: Annually

Data source: Satisfaction surveys obtained by the Program Director

Performance Target: 90% satisfaction with services

St. Clair County Community Integration Services

Goal: Weekly Activity Note and Billing Compliance

Objective: Authorized services will be accurately documented to support individual plan of service goals and claims reimbursement.

Performance Indicator: Audit results

Who Applied to: All individuals authorized for services

Time of Measure: Quarterly

Data Source: OASIS and Weekly Activity Notes data obtained by the Program Director/Supervisor

Performance Target: 95% accuracy

Goal: Individual Focused Services

Objective: Increase satisfaction

*Follow-up and develop appropriate action plans for areas of dissatisfaction

*Education on Person Centered Planning, Recipient Rights, Customer Service

Performance Indicator: Survey results

Who Applied to: All individuals and/or guardians

Time of Measure: Annually

Data Source: Survey results obtained by the Program Director

Performance Target: 90% satisfaction with services

Sanilac Respite

Goal: Weekly Activity Note Compliance

Objective: Authorized services will be accurately documented on the Weekly Activity Notes to support individual plan of service goals and claims reimbursement.

Performance Indicator: 25% of WAN's will be reviewed each month.

Who Applied to: All individuals authorized for services

Time of Measure: Quarterly

Data Source: OASIS and Weekly Activity Notes data obtained by the Program Director/Supervisor

Performance Target: 95%

Goal: Individual Focused Services

Objective: Increase satisfaction

*Follow-up and develop appropriate action plans for areas of dissatisfaction

*Education on Person Centered Planning, Recipient Rights, Customer Service

Performance Indicator: Survey results

Who Applied to: All individuals and/or guardians

Time of Measure: Annually

Data Source: Survey results obtained by the Program Director

Performance Target: 90% satisfaction with services

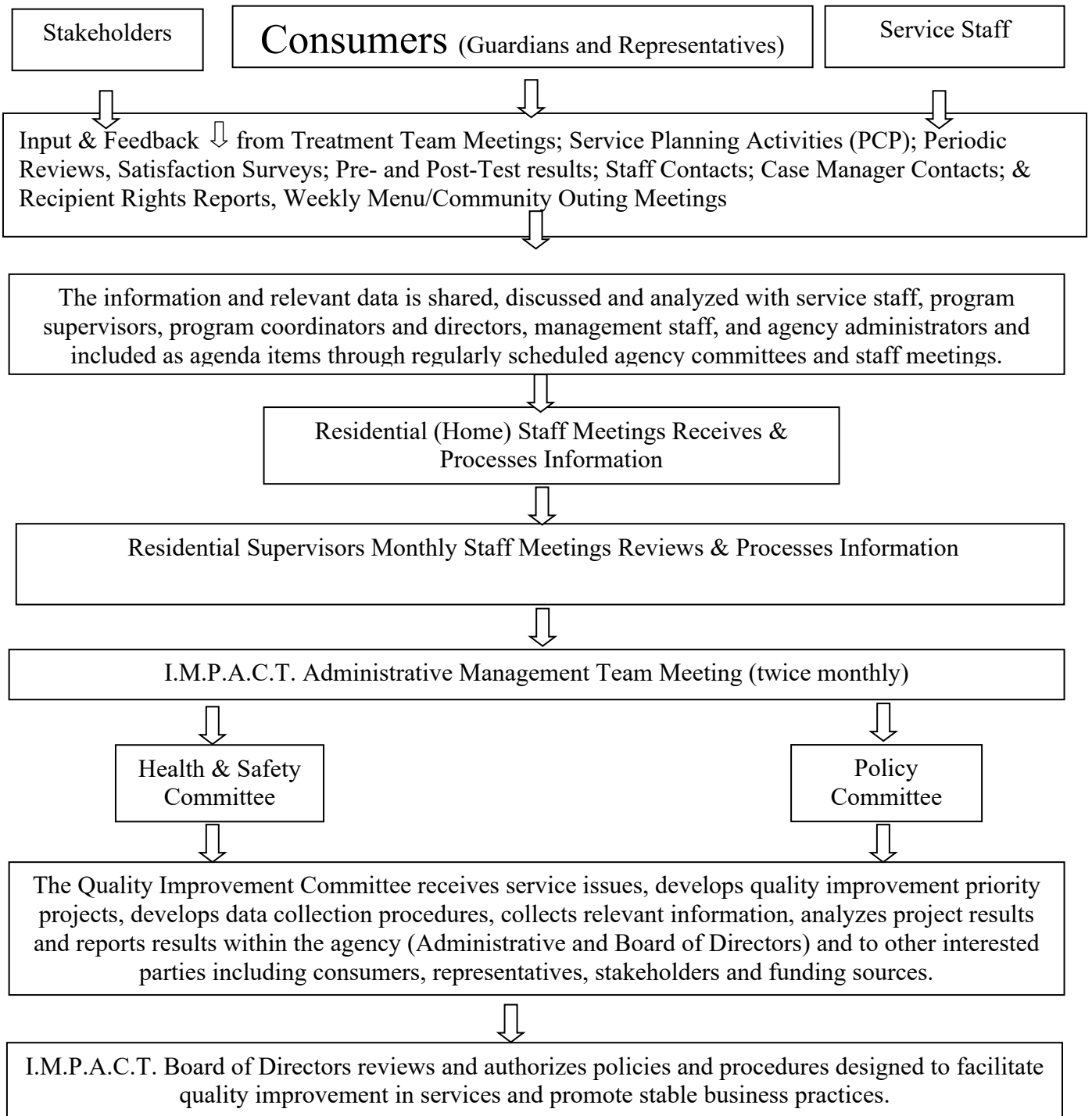
Resource Allocation

Ongoing monitoring and refinement of the service delivery system through the Quality Improvement process will demand significant agency resources. These resource demands will include the use of all personnel (administrative, supervisory, direct service staff, and support staff), supplies and materials, equipment, and various consulting services. One of the purposes of the Quality Improvement (QI) Plan is to examine the resource demands of the QI process and allocate the staff time and other resources necessary to successfully maintain the QI Plan.

Ongoing Monitoring Process and Decision Making - Reporting and Feedback

The Quality Improvement process demands ongoing monitoring of "real-time" information to make decisions beneficial to our consumers and our agency. I.M.P.A.C.T. will compare actual performance to planned performance on a monthly basis. All outcome and performance indicator data will be reported through the Executive Director and Management Team on a quarterly basis to the QI committee and other stakeholders. In addition, the Board of Directors will receive quarterly updates from the QI Committee. Utilization Reviews are also reported on a quarterly basis both to the QI Committee and Management team. All remedial action plans are developed with specific implementation strategies, resource allocations, timelines, personnel accountability and are revisited quarterly as new goals are developed. All information is shared with consumers, staff and stakeholders on a regular basis to elicit feedback needed for the decision-making process. See decision making flow chart.

I.M.P.A.C.T. Decision Making Process



Dissemination of the Management Report and Continuous Quality Improvement Plan

Because we welcome and actively encourage input into our ongoing process of quality improvement, we distribute or make available electronically this report to solicit feedback from:

I.M.P.A.C.T. Board of Directors

I.M.P.A.C.T. Management Team

I.M.P.A.C.T. Employees

St. Clair County Community Mental Health Authority

Sanilac County Community Mental Health

Region 10 PIHP

United Way of St. Clair County

I.M.P.A.C.T. consumers and their families

Other individuals and organizations as determined by the I.M.P.A.C.T. Board of Directors

I.M.P.A.C.T.

Complete QI report will be available by December 2020

I.M.P.A.C.T. - Quality Improvement Summary Report FY 20-21

Residential Community Housing

1. Goal: Residents will participate in community volunteer activities annually and be offered weekly community inclusion activities (*per choice and as clinically appropriate).

Objective: Increase access and participation in the residents' greater community.

Performance Target: Two community volunteer activities annually and two weekly community inclusion activities.

- a. Volunteerism Activities:
- b. Volunteer activities include:

2. Goal: Minimize number of medication errors

Objective: Prevent injury to residents resulting from medication errors

Performance Target: Zero Medication Errors

The chart below lists the residential location and type of medication error.

Location and Type of Error

Location	Missed Med	Wrong Time	Lower Dose	Higher Dose	Wrong Consumer	Wrong Med	Wrong Doc.	Totals
Charmwood								
Belle River								
Michigan								
River Bend 1								
River Bend 2								
Simpson								
Vine								
Wells								
SLAs								
Totals								

St. Clair County Community Integration Services

3. Goal: Weekly Activity Note and Billing Compliance

Objective: Authorized services will be accurately documented on the to support individual plan of service goals and claims reimbursement.

Performance Target: 95% compliance.

I.M.P.A.C.T.
Sanilac Respite

4. Goal: Weekly Activity Note Compliance

Objective: Authorized services will be accurately documented on the Weekly Activity Note (WAN) to support individual plan of service goals and claims reimbursement. 25% of WANs will be reviewed each month.

Performance Target: 95%

Prevention: Alcohol & Other Drugs/Addictions

5. Goal: 100% of consumers will be given the opportunity to complete a Pre- and Post-test at the beginning and following completion of Alcohol & Other Drugs/Addiction classes.

Objective: Pre- and Post-tests will help the Agency improve the quality of services and increase knowledge of the participants. Results may determine the need to modify how the material is communicated to increase retained knowledge.

Performance Indicator: Pre- and Post-test results will be collected and analyzed on a quarterly basis and reported to the Quality Improvement Committee.

Record Compliance (Utilization Review)

- a. Residential
- b. CISD

Individual Focused Services

- a. Consumer Complaints
- b. Residential Services Satisfaction Survey Results
- c. CISD Services Satisfaction Survey Result

Corporate Compliance Complaints

Critical Incidents/Sentinel Events/Serious Accident or Illness

Staff Training

Business Goals

- 1. Staff Recruitment/Retention
- 2. HCBS Medicaid Rule Transition (Residential Programs)
- 3. Prevention Services (Alcohol & Drug Education)
- 4. IT
- 5. Capital Improvement