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September 26, 2017

Jeffrey Prough, CEO/President
Critical Signal Technologies
27475 Meadowbrook Rd
Novi, MI 48377

Dear Mr. Prough,

Enclosed is the report for the annual programmatic monitoring of your Older Americans Act Title III-B/LSP (#17-83) Emergency Alert Response Services program. This monitoring took place on August 18th via teleconference conducted by Elizabeth Heyne, Program Manager. The cooperation, professionalism and effort put forth by Program Director, Heather Robertson to maintain the high quality of this much needed service is appreciated.

This report is intended to provide an overview of the projects operations as of the date of the monitoring review. It should also be a useful instrument in the evaluation of your programs.

Your program is commended for meeting all standards for contract compliance and service delivery.

Should you have any questions or comments concerning this report, please feel free to contact the Program Manager at (727) 570-9696, extension 271. Thank you for your continued commitment to serve the seniors of Pinellas and Pasco County.

Sincerely,

A handwritten signature in black ink, appearing to read "Ann Marie Winter".

Ann Marie Winter
Executive Director

Enclosures

cc: Heather Robertson, Program Director, Critical Signal Technologies



Area Agency on Aging of Pasco-Pinellas, Inc.
2017 LSP/ IIIB/IIIEG PROGRAMMATIC MONITORING CHECKLIST

PROVIDER	Critical Signal Technologies, Inc.
SERVICE(S)	Title IIIB/LSP Emergency Alert Response
DATE(S) OF VISIT	August 18, 2017
PARTICIPANT(S)	Lauren Guerin, Auditor, CST
MONITOR(S)	Elizabeth Heyne, AAAPP Program Manager

CONTRACT COMPLIANCE AND SERVICE DELIVERY

STANDARD #1 – Previous Programmatic Monitoring

All issues from the previous programmatic monitoring have been resolved within an established and reasonable timeframe.

RESPONSE:

There were no unresolved issues from the previous programmatic monitoring which took place on August 11 & 16, 2016.

Achieved Partially Achieved Not Achieved Not Applicable Follow-up Necessary

STANDARD #2 – Targeting, Prioritization and Waitlist

A targeting plan with specific targeting objectives is in place:

- A. The Provider has implemented the approved plan to target individuals with greatest economic need, older individuals with greatest social needs, older individuals at risk for institutional placement, older minority individuals, low-income minority older individuals, older individuals with limited English proficiency, and older individuals residing in rural areas (Pasco only).
- B. Provider is serving the proposed number and percentage of older individuals with greatest economic need, older minority individuals, older individuals at risk for institutional placement, low-income minority older individuals, older individuals with limited English proficiency, and older individuals residing in rural areas (Pasco only).
- C. The Provider currently utilizes an Older Americans Act Prioritization Instrument in accordance with the Provider's Prioritization Policy.
- D. If applicable, the Provider's waitlist policies and procedures have been appropriately established, maintained, and utilized as necessary.

RESPONSE:

- A.) Provider outlined their plan to target individuals in their 2017 Continuing Application. Review of policies, procedures and client files reflected the plan is being implemented appropriately.
- B.) Per the current Quarterly Report, the provider has exceeded or is on track to serve the proposed number of clients in Pinellas County. The provider will continue to prioritize referrals to ensure the proposed numbers of clients are served in each of the targeting categories for Pasco County. The chart on page 3 provides the proposed vs. achieved data based on the provider report from Quarter 2. The AAAPP will continue to provide technical assistance to ensure the provider achieves the Pasco proposals for the OAA program.

PASCO

OAA	Proposed	Achieved	LSP	Proposed	Achieved
Social Need	20	18	Social Need	20	18
Low income minority	4	3	Low income minority	3	3
Minority	5	2	Minority	4	2
Economic Need	19	6	Economic Need	19	6
Limited English	3	1	Limited English	2	1
At Risk	7	3	At Risk	6	3
Rural	7	1	Rural	7	1

PINELLAS

OAA	Proposed	Achieved	LSP	Proposed	Achieved
Social Need	49	100	Social Need	50	97
Low income minority	18	9	Low income minority	20	9
Minority	22	23	Minority	24	22
Economic Need	53	75	Economic Need	53	72
Limited English	4	8	Limited English	3	7
At Risk	9	28	At Risk	8	27

C.) The provider is utilizing an approved prioritization instrument as outlined in their Prioritization Policy.

D.) Waitlist policies and procedures are adequately maintained.

Achieved
 Partially Achieved
 Not Achieved
 Not Applicable
 Follow-up Necessary

STANDARD #3 – Staff Training

Provider staff has received training pertinent to the performance of required functions:

- A. Utilizing the appropriate DOEA Assessment Tool including the 701S, 701A and/or 701C (Registered Services only) in accordance with the DOEA Programs and Services Handbook.
 - Review of policies and procedures for DOEA Assessment Tools including the 701S, 701A, and/or 701C to ensure assessments are being completed as outlined in the DOEA Programs and Services Handbook.
 - Ensure requirements for face to face visits are being adhered to.
- B. Quality assurance activities to include use of the Assessment Instructions (DOEA 701D), direct observation, coaching, and training of screening staff to ensure the accuracy and quality of the screenings being conducted.
- C. DOEA standards for specific service training as outlined in the most current DOEA Program and Services Handbook is being utilized:
 - DOEA web-based training with receipt of a certificate of completion; a score of 90 percent or above on the multiple-choice test is required.
 - DOEA 701S Training Webinar with appropriate documentation of completion is required per the AAAPP.
- D. Mandatory reporting of suspected abuse, neglect, self-neglect, and exploitation of the elderly training has been conducted.

RESPONSE:

- A.) N/A. Emergency Alert Response in not a registered service.
- B.) N/A. Emergency Alert Response in not a registered service.
- C.) N/A. Emergency Alert Response in not a registered service.
- D.) Program Manager verified, by review of CST's training logs, that training is conducted annually on the mandatory reporting requirement for persons suspected of being abused, neglected, and/or exploited.

Achieved Partially Achieved Not Achieved Not Applicable Follow-up Necessary

STANDARD #4 – Programmatic Reporting

All required programmatic reports are accurate and submitted in a timely manner:

- A. Annual Outreach and Public Education Report
- B. Quarterly Reports
- C. Detailed meeting minutes from the agency Board of Director Meetings are submitted regularly.
- D. Surplus/Deficit Reports

RESPONSE:

- A.) The Annual Outreach and Public Education Report was submitted in March 2017. No concerns noted.
- B.) All quarterly reports are submitted on time and are considered accurate.
- C.) Board of Director meetings are held quarterly and meeting minutes are submitted to the AAAPP.
- D.) Surplus/Deficit reports are submitted by the 20th of each month and are considered accurate.

Achieved Partially Achieved Not Achieved Not Applicable Follow-up Necessary

STANDARD #5 – Outcome Measures

*Outcome measures referenced in the current Standard Contract are achieved:
(OAA REGISTERED SERVICES ONLY)*

- A. Provider has implemented the strategies detailed in the current Service Provider Application.
- B. Provider uses available CIRT reports to track outcome achievement.
- C. Provider submits quarterly reports including review of outcome exceptions.
- D. Provider analyzes factors that enhance or inhibit ability to achieve outcome measures.
- E. Provider takes appropriate action including staff training to address outcomes, which are not achieved.

RESPONSE:

Emergency Alert Response is not an OAA Registered Service.

Achieved Partially Achieved Not Achieved Not Applicable Follow-up Necessary

STANDARD #6 – Case Record Compliance

Case records sampled showed:

- A. Compliance with requirements for client eligibility, intake, and service delivery.
- B. CIRT records of assessment/reassessment, program enrollment and received services are accurate, entered in CIRT in a timely manner and agree with client and project records:
 - 701S attempts are made within three business days after receipt of a client referral and completion of assessments are no later than 14 business days from initial contact.
 - Reassessments are completed 365 days after the prior assessment through the end of the month.

RESPONSE:

- A.) The Program Manager randomly sampled ten (10) clients for file review purposes. The ten client files represented a variety of client enrollments. Files reviewed were in good order and were in compliance with requirements for client eligibility, intake, and service delivery. Please see **Attachment I.** for specific details.

- B.) N/A

Achieved Partially Achieved Not Achieved Not Applicable Follow-up Necessary

STANDARD #7 – CIRTS Exception Reports

CIRTS Exception Reports are accurate and exemplify 100% accuracy (OAA REGISTERED SERVICES ONLY). Specific Older Americans Act Reports include:

- *Assessment Due Report;*
- *ACTV, APPL, APCL Clients Moved To Another PSA;*
- *ACTV Clients Not Served In A Time Range (Defaults To 14 Months);*
- *Clients Served Not Enrolled;*
- *Consumer Age Verification;*
- *Possible Duplicate Clients;*
- *ACTV Pace Clients Who Are ACTV, APCL, Or APPL In Another Program;*
- *CIRTS Data Clean Up;*
- *ACTV MLTC Clients Who Are ACTV, APCL, Or APPL In Another Program, and*
- *Data Inconsistencies Found When Comparing Vital Statistics Death Certificates With CIRTS*

RESPONSE:

Emergency Alert Response is not an OAA Registered Service.

Achieved Partially Achieved Not Achieved Not Applicable Follow-up Necessary

STANDARD #8 – Budgetary Compliance

Budgetary Compliance:

- *Provider is serving or has a plan to serve the number of proposed units as identified in the service provider application.*
- *For the month of **March**, the Provider has a clear audit trail for units of service entered in CIRTS as indicated by a review of client files, service logs, monthly summaries, and quarterly reports to the AAAPP.*

RESPONSE:

- *Provider is serving and has a plan to serve the number of proposed units as identified in their most current approved Service Provider Application. The program is slightly under the expected expenditures for OAA funds YTD. The provider will continue to monitor the budget to make sure all funds are spent by the end of the fiscal year and will continue to provide updates via monthly surplus/deficit reports.*
- *Provider utilizes CIRTS for monthly aggregate reporting as required for Emergency Alert Response. There was a clear audit trail for all units of service entered in CIRTS as verified by client files, service logs and quarterly reports.*

Achieved Partially Achieved Not Achieved Not Applicable Follow-up Necessary

STANDARD #9 – Consumer Satisfaction

Consumer satisfaction and effective delivery of service has been verified through:

- A. Home visits and/or Client Interviews (including service observation, if possible) in order to reveal effective delivery of service.
- B. Client satisfaction surveys accompanied by a Satisfaction Survey Summary Report.

RESPONSE:

- A.) A policy is in place regarding client satisfaction. The Program Manager had the opportunity to perform a client interview with a service recipient. See **Attachment II.** for specific details.
- B.) Satisfaction summary report was reviewed with no issues noted.

Achieved Partially Achieved Not Achieved Not Applicable Follow-up Necessary

STANDARD #10 – Grievances, Complaints, and Incidents

Consumer satisfaction and effective delivery of service has been verified through:

- A. Provider has approved Grievance Policies, Procedures and Logs, including documentation of the Service Provider response and resolution.
- B. Provider has approved Complaint Policies, Procedures and Logs, including documentation of the Service Provider response and resolution.
- C. **(LEGAL PROVIDERS ONLY)** Provider has internal Grievance policies and procedures that address both denial of service and complaints by clients about manner or quality of legal assistance.
- D. Provider has approved Incident Policies, Procedures, and Logs, including documentation of the Service Provider response and resolution.

RESPONSE:

- A.) Grievance policies and procedures were reviewed. No concerns noted. No grievances to date for 2017.
- B.) Complaint policies and procedures were reviewed. One complaint was received this year which was satisfactorily resolved by CST. All complaints must be recorded, even when satisfactorily resolved, as stated in CST's Policy 150.10 and per AAAPP contractual requirements.
- C.) N/A
- D.) All incident policies and procedures were reviewed. No concerns noted. No incidents to date for 2017.

Achieved Partially Achieved Not Achieved Not Applicable Follow-up Necessary

STANDARD #11 – Voluntary Contributions

Provider has a voluntary contribution system in place conforming with the Older Americans Act:

- A. Approved Voluntary Contributions Policy/Procedures
- B. Sample letter provided to client requesting voluntary contributions and clearly conveying that services are free of charge.

RESPONSE:

- A.) Procedure is in place regarding voluntary contributions.
- B.) The sample letter was reviewed regarding requests for voluntary contributions. No concerns noted.

Achieved Partially Achieved Not Achieved Not Applicable Follow-up Necessary

STANDARD #12 – Regulatory Compliance

OAA Provider is in Regulatory Compliance with:

- A. OAA services reviewed are being provided in accordance with the most current DOEA Program And Services Handbook and the most current approved Service Provider Application
- B. Provider complies with all regulations pertinent to the service being provided (I.E, fire, health inspections, Licensure, etc.)
- C. The Provider is acting in accordance with the Florida Statute 119.071 (5) requiring any agency that collects social security numbers to provide a written explanation to the individual the reason for its collection.
- D. Health Insurance Portability and Accountability Act (HIPAA) requirements including policies/procedures.

RESPONSE:

- A.) Services are being provided in accordance with DOEA Programs and Services Handbook and the most current approved Service Provider Application.
- B.) The provider is compliant with all regulations pertinent to the service being provided. The Program Manager was provider with the most current Alarm System Contractor License issued for Florida.
- C.) According to FL Statue 119.071 (5) the provider is claiming the status of “exemption from this requirement”, due to not collecting client social security numbers.
- D.) HIPAA requirements are being adhered to. Policies and procedures are in place.

Achieved Partially Achieved Not Achieved Not Applicable Follow-up Necessary

STANDARD #13 – Involvement with the ADRC

Provider is involved with the Aging and Disability Resource Center (ADRC) and abides by the no-wrong-door system:

- A. Maintains partnership with the ADRC, state, and community agencies to ensure that regardless of which agency people contact for help, they can access information about the options available across all the agencies and in their communities.
- B. Services not arranged through agency contracts should be obtained through referrals to other community resources (i.e. ADRC, volunteer agencies, informal networks and/or proprietary agencies that charge fees).
- C. If applicable, essential information is captured about the nature of the person’s physical, mental and functional abilities, concerns, limitations or problems, as well as general background information during the 701S intake process to assist in screening for eligibility and applicable program and service referrals. Potential LTCC clients are referred to the ADRC for the appropriate screening measures.

RESPONSE:

- A.) The provider maintains a positive partnership with the ADRC to ensure referrals receive the assistance they need. If the provider receives a referral from someone in need of additional services, a referral is made to the ADRC.
- B.) The provider ensures referrals are made to the ADRC.
- C.) N/A

Achieved Partially Achieved Not Achieved Not Applicable Follow-up Necessary

STANDARD #14 – Subcontractors

Provider monitors subcontractors as required by the Standard Contract (if applicable).

RESPONSE:

All of the CST installers are monitored for their compliance as subcontract (1099) employees and are subject to successful completion of training around equipment/hardware, OAA IIIB program requirements and a criminal background check, drug screening and reference checks. Further, all subcontract employees must possess a valid driver’s license and automobile insurance. The Program Manager was provided with a statement from CST regarding their most recent field supervision review.

Achieved Partially Achieved Not Achieved Not Applicable Follow-up Necessary

STANDARD #15 – Volunteers

Provider has policies/procedures governing the utilization of volunteers.

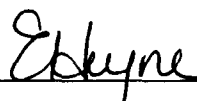
RESPONSE:

CST currently does not utilize any volunteers due to restrictions of being a for-profit company.

Achieved Partially Achieved Not Achieved Not Applicable Follow-up Necessary

Submitted by: Elizabeth Heyne, AAAPP Program Manager

Date: August 25, 2017

Signature: 



Area Agency on Aging of Pasco-Pinellas, Inc. Client File Monitoring Tool for Unregistered Services

Organization: Critical Signal Technologies, Inc.

Unregistered Service: Emergency Alert Response

Questions	CC	PG	HG-E	MJ	MN	MS	KK	MZ	IG	MS	Comments
Was an Intake/Registration Form completed and if applicable, updated annually?	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	
Was Client Eligibility Verified? (see "Service Eligibility for OAA Programs")	Y	Y	Y	Y	Y	N (1)	Y	Y	Y	Y	(1) OAA targeting category "Rural" was not checked on the prioritization tool or assessment for this client.
Has OAA Priority for Service Delivery been established?	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	
Did the worker obtain a signed Release of information/HIPAA form?	Y	Y	Y	Y	Y	Y	N/A	N/A	Y	Y	
Was the client notified of why their ssn# information is being used? (if applicable)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Provider does not collect social security numbers.
Did the worker notify the client of their current Complaint Procedure?	Y	Y	Y	Y	Y	Y	N/A	N/A	Y	Y	
Are monthly units correctly reconciled?	N/A (2)	Y	Y	N/A (2)	N/A (2)	Y	N/A	N/A	N/A (3)	N/A (3)	(2) The audit trail reviewed was for March 2017. These clients enrolled in the program after 3/2017. (3) Clients terminated from the program prior to 3/2017.
Do Progress Notes reflect the last contact?	Y	Y	Y	Y	Y	Y	Y	Y	N	N	
Does documentation support a change in service delivery?	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Notes	Active	Active	Active	Active	Active	Active	Waitlist	Waitlist	Terminated	Terminated	

Yes = Compliant

No = Non-Compliant and Comment is required

N/A = Not Applicable

OAA CLIENT INTERVIEW QUESTIONNAIRE

AGENCY & SERVICE: Critical Signal Technologies / Emergency Alert Response

1. How did you hear about the service you are currently receiving?

"My wife had it when she was receiving services from Gulf Coast Jewish Family and Community Services"

2. How long have you been receiving services from this agency?

"Since July 3, 2017"

3. Do you have a particular contact person you speak with about services?

"I can call the main number at CST"

4. Do you know how to contact him/her or the agency providing the service?

"Press the button or call the main number"

5. How often do you receive this service?

"24/7. I wear the device all the time"

6. Do you feel this service allows you to remain home independently?

"I feel a little safer knowing I can always press the button"

7. Have you ever had to make a complaint about the services you receive or the person providing the services?

"No"

8. How do you rate the quality of the service you are currently receiving and/or the agency providing it?

Excellent	Good	Fair	Poor
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

9. What is the reasoning for your choice rating regarding question #8?

"The installer was very good. He suggested a better connection and followed through with installing it that way"

10. If you could change anything about the service you receive or the agency providing it, what would you change?

"The only thing I would change is that it only works within 300 yards and I would like to know I am safe if I am outside of that range, but overall it is very good"

INTERVIEWER OBSERVATIONS:

The Program Manager interviewed a recipient of CST's Emergency Alert Response device in his Largo home on August 18, 2017. The client reports that he is 81 years of age and recently became a widow when his wife passed away earlier this year. He expressed familiarity with the AAAPP as his wife received in-home care from Gulf Coast Jewish Family and Community Services. The client stated that he was hospitalized in May for five days and then was discharged to rehab returning home on June 9, 2017. He stated that his physician's office called the ADRC to arrange for a telephone screening as the client is in need of assistance in managing his IADLs. He reports that he is now on dialysis following his hospital/rehab stay and is most interested in receiving homemaking services.

The client was screened by the ADRC on June 22, 2017 and placed on the waitlist for the Community Care for Elderly program, Medicaid Long Term Care, Home Delivered Meals, and Homemaker services. The Program Manager reviewed all of the above programs with the client, explained the waitlist process and encouraged him to call the Helpline if he experiences any significant changes so the ADRC can update his assessment. Information was provided to the client on the ADRC (brochure), Pinellas County All Hazards Preparedness Guide and the Department of Elder Affairs Preparedness Guide for Elders.

Submitted by: Elizabeth Heyne

Date: August 25, 2017

For OAA Use Only