

ADHS Provider Response to SAMHSA Fidelity Review

Complete the following form in response to the SAMHSA fidelity review process conducted by ADHS behavioral health staff.

Date: September 30, 2014

Name and contact information of provider:

John Moore, Deputy CEO & CFO
 Marc Community Resources, Inc.
 480-969-3800

Type of evidence-based practice provider (select one):

	Permanent Supportive Housing
X	Supported Employment
	Consumer Operated Services
	Assertive Community Treatment

What was your experience with the fidelity review conducted at your agency?

We recognize the importance of fidelity reviews in improving the vocational services that we provide and value any input that helps us provide the best care possible. We are always prepared to take advantage of any technical assistance that is constructively provided. We are completely in favor of improving our Supported Employment program which we have been running for many years and we realize we are not in complete fidelity to the SAMHSA Tool Kit standards. Based on the individuals we see, we recognize that the SE Toolkit only works well with individuals who are interested in competitive employment. We also receive referrals for individuals who do not seek competitive employment at the moment and while we try to encourage them to give it a try, they ultimately make their own choices. Rather than tell them to come back when they are ready to make that leap, we have developed other vocational options that allow them to take steps in that direction. We realize that SE is an extensively researched evidence-based practice and we would like everyone to make that choice, however, we also believe it is person-centered, strengths-based or recovery-oriented to offer individuals alternatives that match their desires. We believe that our toolkit (aka service array) has to have more than one tool. We look forward to working with MMIC to follow up on any issues that will improve our fidelity to the SAMHSA Supported Employment Toolkit.

There were seven overarching concerns noted during the fidelity review including: 1) The report mentioned numerous times that our multiple vocational program options seriously complicated the fidelity analysis and how to interpret the spreadsheets we provided. We agree and believe that in many cases, that the reviewers were scoring other vocational programs that we offer as if they were our Supported Employment program. 2) While the reviewers requested and received a great deal of program information in the form of spreadsheets, printouts and had access to Marc's electronic clinical record system, there is no evidence in the report that this data was ever used, analyzed or reconciled with information from interviews. The reviewers relied primarily on interview quotes to form opinions and

score fidelity despite the fact that the data and clinical records supported completely different conclusions. In fact, when the SAMHSA contractor asked for some documents, one of the reviewers in training stated they were in his packet to which the contractor replied “I guess you can tell I am not very good at Christmas,” indicating he had not looked at any of the documents sent prior to the audit. 3) In multiple locations, the reviewers’ report included broad sweeping inflammatory statements about Marc steering people away from competitive employment without evidence and without validating these and other findings while on-site before a broader audience became exposed to an unvetted and inaccurate report. In fact, not only was there no exit meeting, there were virtually no questions asked by the reviewers while on-site even though the reviewers acknowledged multiple challenges with the review in their report and on the follow-up call which had the potential to significantly alter the findings of the report. When we had a phone call after the report was released the SAMHSA contractor became very defensive when asked what data other than quotes were used to score the items. 4) It was apparent that some of the reviewers had a strong bias against any vocational services other than competitive employment and these opinions inappropriately influenced the scores. For example, the reviewers commented that “agencies that have paid work activities and other vocational options typically don’t provide high fidelity SE” or “The pressure and expectations of fulfilling agency-based work activities or contracts with employers often impedes employment specialists from helping to develop diverse competitive jobs that members “own” in the community.” When we connected with our clinical partners after the review we were told that the reviewers did not specifically talk about Marc's Supported Employment services but that all vocational providers were brought into the conversation as well as housing, hospitalization and substance use. There was a discussion regarding how work adjustment has not been proven to be an effective service for employment but questions specific to Marc were not part of the overall discussion. Again, this shows bias regarding other vocational programs or opportunities and does not effectively evaluate the current supported employment services that Marc is providing and limits the opportunity for an objective evaluation of current practice. This bias might explain why some strong opinions were expressed without evidence and/or without acknowledging clear evidence to the contrary. 5) To some degree, the review team was evaluating the entire RBHA system and it was very disconcerting that quotes from SMI clinic staff were clearly used as evidence to score Marc’s SE. That might be unavoidable in the integration section, but it is not relevant in the other sections. In many cases, it was difficult to determine if reported quotes were from Marc or clinic staff. While the system factors are an important element of providing SE services, these need to be examined separately rather than attributing systems barriers to a provider who has limited control over the process. 6) As an agency that is audited, reviewed and monitored a dozen times a year, we found it highly unusual to issue a report with broad sweeping conclusions, even to the point of implying what our motives are with respect to what is in the best interest of our service recipients, without allowing us to validate the supporting data. We understand the potential value of keeping quotes anonymous. However, under the current review protocol, we cannot determine which staff, if any, need training or if quotes were misunderstood or taken out of context. 7) One final issue was that the review was rescheduled three times, making it challenging to reschedule interviews and other activities to accommodate the schedule changes. The reviews should be better organized and scheduled so that they are minimally intrusive to the provider’s normal service activities.

Before the review started, the fidelity reviewers indicated that “providers are very defensive because they use quotes.” That should be expected when the review ignores other objective data that contradicts many of the quotes that appear to be exclusively used to score the review. Indeed, the many concerns outlined above produced a review process that was more antagonistic than focused on continuous improvement and produced a report where more time was spent on identifying errors than on digesting actionable recommendations. Prior to next year’s review update, we are committed to meet and partner with the review team to discuss mutually agreeable process and communication protocol to ensure that, in the end, we are only discussing facts and not biased opinions.

Other specific issues related to the draft findings are outlined in the detailed sections in the “Comments on Findings” section later in this feedback form.

What was most helpful about the fidelity review process for your agency?

The suggestions regarding creating a stand-alone SE program and the need for ongoing training to integrate services with the clinical teams are helpful. It is clear that a stand-alone program may eliminate some of the challenges that the review team experienced regarding the findings. Also, creating a spreadsheet for each individual in SE to track services and changes was a good observation and a necessary improvement to our process. We are concerned that as long as we have a variety of vocational programs and the review team fails to distinguish these programs that the inaccuracies identified during this review will continue.

What suggestions would improve the review process?

The following is recommended to improve future fidelity reviews:

1. All analysis, interviews, comments, evidence and conclusions should be focused solely on the supported employment program rather than other vocational programs and activities.
2. Triangulate and reconcile all sources of data (interviews, observations, medical record information and other data). Conclusions cannot be reached if there are important discrepancies between the sources of data.
3. The spreadsheet template that is given to providers needs to contain the data that is relevant to an SE evaluation (Date of SE intake, number of days from SE intake to first employer contact and diagnosis code). The current spreadsheet has confusing category headings.
4. Preliminary findings must be reviewed with provider staff during the on-site audit to ensure that relevant information was not overlooked and the conclusions are accurate.
5. Eliminate references to clinic staff if the specific evaluation element is solely a provider responsibility.
6. Provide the actual data that supports important findings rather than rely exclusively on quotes so the report has integrity and recommendations are actionable.
7. The reviewers should leave their bias at home when reviewing agencies and stick to the task they are assigned.
8. Inflammatory and unsupported comments should not appear in reports. The report needs to be balanced and professional or it will be rejected by the receiver.
10. Rather than assume that an agency that provides multiple services cannot attain fidelity in a distinct program, the reviewers should have provided suggestions for what services are appropriate for individuals who do not choose competitive employment as their goal. Implying that the person made the wrong choice or the agency made a mistake or “steered them” by offering them other services is not strengths-based, person-centered or recovery-oriented.
11. The implication that having alternative programs for individuals who do not choose competitive employment is a barrier to supported employment is not consistent with the ADHS/DBHS Guiding Principles for Recovery-Oriented Adult Behavioral Health Services and Systems which

clearly articulate that “persons in recovery choose their own goals” and “People in recovery choose their own services”.

Comments from your agency regarding the findings of the review and/or the fidelity report:

COMMENTS ON FINDINGS:

Staffing:

Item #2: **Vocational Services Staff:**

Two of the Supported Employment staff at Marc Community Resources who provide SE services also provide other vocational services but only a fraction of their time. These services are designed to acquaint and motivate individuals who initially did not chose competitive employment and to form a relationship with the Employment Specialists so they know who will help them find a job when they begin to consider competitive employment as an option. We have found this time to be well spent and beneficial for many individuals who initially lack self-confidence to engage in competitive employment. We consistently try to encourage individuals in these programs to try competitive employment and many do but it is on their own schedule, not ours.

Organization

Item#1 **Integration of rehabilitation with mental health treatment:**

Marc recognizes the difficulties of integration of vocational staff with clinical teams and welcomes any suggestions for improving collaboration. Marc is certainly willing to play our part in any initiatives in this area.

The scoring of this item relies on clinic site interviews. This goes back to the earlier comments that Marc conducts a variety of programs. The staffings that were referenced in the report were indicative of individuals who were enrolled in other vocational activities that are not part of our supported employment program. In these cases, employment specialists would not be present at the clinic staffings. As a person identifies competitive employment as a goal, they are transferred to an employment specialist who attends staffings and we have data that was contained in the sample of individuals that were requested where 30 day staffings were conducted with clinical team members. That data was also available in the electronic clinical records that were reviewed.

Using electronic records can initially be challenging and in fact we have to provide half a day of training for new staff at all levels and considerable coaching is required after the training. The review team spent approximately two hours with the electronic records and we believe they had issues in finding the information that confirmed these meetings and other information in the record. We provided a staff member who remained outside the room to provide assistance with the record. In addition, staff inquired if any additional help was needed and was told “No, I don’t think we have ever had this much help when reviewing records.” No questions were ever asked.

Item #3 **Zero-exclusion criteria**

Many of the statements reported by the fidelity reviewers are based on comments provided by case managers and rehabilitation specialists at SMI clinics. The fact that the term “members’ is used identify the clinics as the source since we do not use that term at Marc. Marc Community Resources does not exclude anyone from supported employment services due to substance abuse disorders. In fact, the majority of individuals in our program have either current histories of substance abuse disorders or an active dx of substance abuse as per their Comprehensive Assessment. There is no question that active substance abuse can interfere with job stability and is not something to be ignored, but services have never been denied because someone has a challenge with substance use or abuse. When an individual presents with these issues, we work with clinical teams to address them, but this does not delay enrollment in competitive employment. We cannot tell if a clinical team screens someone out before they are referred to us and we should not be scored on what a PNO team does prior to our involvement

Without taking away our acknowledgement that opportunities to improve exist, Marc service recipients are not systematically screened out or redirected to other vocational services. In some case, it appears that the fidelity reviewers may have mistaken tools to assess interests, strengths, aptitudes and preferences which are totally consistent with SE principles for “readiness” assessments. The self-assessment used at intake is designed to help us see where the person thinks they are at in terms of finding work. We have often been able to show someone who rates themselves low in areas of employment that they would benefit from working with an employment specialist immediately despite the original informed choice of other vocational services.

Services

Items #1 **Ongoing work-based vocational assessment:**

Clearly, it is challenging for outside reviewers to evaluate a Supportive Employment program in an agency with many vocational options. Since Marc accepts referrals from individuals who state that they do not know if competitive employment is their personal goal, other programs had been developed to assist them. This item is an example of the fidelity reviewers going beyond the Supported Employment program to score this item. The reviewers used observed activities and quotes that relate to individuals who are involved in other vocational services who have not chosen competitive employment as their goal. We agree with the report comments that “the above (assessment) approaches may have their place in other types of employment services, but are not consistent with SE services”. And in fact that is exactly where they are being used. We do conduct assessments of the person when they are in the supported program but they are used to identify strengths and preferences and are consistent with the SE model. In addition, the data that we delivered to the review team prior to their actual review clearly indicates that 83% of the individuals who chose a competitive employment goal received an employer contact within 30 days of their enrollment in the program. Clearly unnecessary and burdensome assessments did not delay their involvement in job search activities. This data was not used or referenced in the report.

Item #2 **Rapid Search for Competitive Jobs:**

As previously stated, the data that we provided to the review team on a 20 person sample of individuals involved in the Supported Employment program indicates that 83% of the individuals who chose a competitive employment goal received an employer contact within 30 days of their

enrollment in the program and 90% within 45 days. This data was not used or referenced in the report.

Despite the data indicating otherwise, Marc received a score of 1 when the definition of fidelity in the area of rapid job search according to the SAMHSA toolkit states a 1 means: “first contact with an employer about a competitive job is typically more than 1 year after program entry.” The difficulty again is that it does not appear that any data was used to determine a score objectively and the confusion between programs led to a conclusion that is not supported by the data that was available to the fidelity team.

We believe that this is another example of the review team failing to discriminate between the SE program and other vocational activities. We recognize that because some individuals transfer from other vocational services to supported employment when they desire a competitive employment position, it is difficult to assess timeframes. However, the agency’s electronic health record system indicates a progress note for each person that documents when he/she requested SE services, a note from the employment specialists and a job lead on the provided employment logs. Unfortunately, when the reviewers encountered the “complicated referral process,” staff were not asked questions that could have directed reviewers to the information they were looking for to calculate precise service timeframes.

Item#3 **Individualized Job Search**

The comments regarding Marc’s unique philosophy of job development as being some sort of self-servicing economic model are completely inaccurate and irrelevant since the person being quoted is not a SE job developer. Instead, he is the Director of Economic Development responsible for creating a host of strategic partnerships with local businesses including, but not limited to, various employment initiatives which are then turned over to actual job developers, as applicable, to determine if a specific job exists that meets the custom preferences of SE job seekers. This ensures that we have done an environmental scan of the employee needs of a wide variety of companies in the area. When an individual identifies a job preference, we are prepared to connect the individuals with agencies that are looking for people with that job preference and skill set. If the individual expresses a preference for an employer that we have not researched we assist them with that as well. This is not inconsistent with an SE model as implied in the review but is actually an enhancement that allows for more rapid job search. If the person identifies a preference for a job in an area where we have not identified a company or contact, we assist the person to identify companies where that type of job would be available and assist them in setting up an interview if there is a vacancy available. This is actually a proactive step used to identify a range of employers that have certain job types and vacancies so that the first interview can proceed more swiftly. Although when necessary we also assist the person in cold calling employers; however, this method often results in frustration since employers may not need that type of position or do not have vacancies. This can significantly delay the interview and hiring process. In addition, when this staff member reviewed the comments attributed to him he was surprised that of all the things he spoke to the team about, they only quoted his comment regarding how we respond to business needs as part of an overall process and used that as “evidence” of a darker and more cynical approach to job development.

We also are able to identify companies that have short term employee needs that we can offer individuals who have not chosen competitive SE but are willing to try a temporary position before they decide. For example, a few months ago, this person secured a group supported employment opportunity to work at Cubs spring training games paying more than minimum wage. Of the six individuals who participated, three then selected SE and are now competitively employed.

Item #4 Diversity of Jobs Developed

We take exception to the statement “The pressure and expectations of fulfilling agency-based work activities or contracts with employers often impedes employment specialists from helping to develop diverse competitive jobs that members “own” in the community.” Unless there is objective evidence to back this up from your review at Marc, we believe this represents the team’s inability to distinguish between the multiple vocational programs at Marc Community Resources and an obvious bias that where there are vocational activities other than SE at an agency, diverse job creation simply cannot occur effectively.

We sent spreadsheets to the review team with caseloads of the employment specialists and names of people employed in the community. The spreadsheets had first name, last initial, the intake date into SE services, other services received, whether they were active in their job search, type of job they have, name of their employer, if they were receiving Extended Supported Employment services, start date of employment, the first employment contact, and attached job search logs. In fact, 10 of the 20 files reviewed were individuals with competitive community jobs at 8 different organizations and none were placed in agency-based work crews or pre-arranged positions. The 40 % placement rate for the individuals on the SE caseloads are only individuals who have been competitively placed and “own” their jobs in the community. Examples on the spreadsheets included individuals that were placed at Target, Walmart, Whataburger and Discovery Point in jobs that were not pre-arranged and have nothing to do with Marc Community Resources. We cannot understand or see any evidence to support the comment “nearly all members who were identified as “employed” were working in some type of agency-based (either on-site or off-site) work crews or at pre-arranged positions with employers.” The statement in the report has no merit. It should be noted that as part of the fidelity review the reviewers did request that they interview participants from other vocational programs as part of the interview process which Marc accommodated, but may have led to more confusion and subjective conclusions for the review team.

Item #5 Permanence of Jobs

The spreadsheets for individuals involved in the Supported Employment program listed both the start date of employment and the longevity of the employment. The employment start dates were from June 1998 to May 2014. It is difficult to determine why there was a finding that jobs were not permanent unless the review team was including other vocational services which should not have been the focus of this review. Independent reviewers that talk with a large number of our service recipients (like CARF surveyors in May 2014) consistently conclude that the people we serve make vocational choices in a person-centered environment, own their vocational goals and are highly satisfied. It would appear that the fidelity reviewers have inserted their own bias, don’t like the choices Marc service recipients are making and assert that because they are making choices that are not within the realm of Supported Employment services they must therefore be inappropriately steered. While we can and will improve on all areas of this report, the sweeping implications of manipulation of people who received employment services at Marc are completely inaccurate and are based on subjective and biased opinions. They have no place in a professional evaluation.

