

# PROVIDER REPORT FOR

VALLEY EDUCATIONAL
ASSOCIATES
P.O. Box 46
Hatfield, MA 01038

May 17, 2024

Version

**Public Provider Report** 

Prepared by the Department of Developmental Services
OFFICE OF QUALITY ENHANCEMENT

# **SUMMARY OF OVERALL FINDINGS**

Provider VALLEY EDUCATIONAL ASSOCIATES

**Review Dates** 3/27/2024 - 4/2/2024

**Service Enhancement** 

**Meeting Date** 

5/3/2024

Survey Team Ken Jones

Andrea Comeau (TL)
Melanie McNamara

**Citizen Volunteers** 

| Survey scope and findings for Employment and Day Supports |                               |                    |   |                        |   |
|---|-------------------------------|--------------------|---|------------------------|---|
| Service Group Type  | Sample Size                   | Licensure<br>Scope | Licensure<br>Level                                    | Certification<br>Scope | Certification<br>Level  |
| Employment and Day<br>Supports                            | 3 location(s)<br>14 audit (s) | Full<br>Review     | 59/66 2 Year<br>License<br>05/03/2024 -<br>05/03/2026 |                        | 26 / 41<br>Certified with<br>Progress<br>Report<br>05/03/2024 -<br>05/03/2026 |
| Community Based Day<br>Services                           | 3 location(s)<br>7 audit (s)  |                    |   | Full Review            | 11 / 15   |
| Employment Support<br>Services                            | 0 location(s)<br>7 audit (s)  |                    |   | Full Review            | 14 / 20   |
| Planning and Quality<br>Management                        |                               |                    |   | Full Review            | 1 / 6   |

#### **EXECUTIVE SUMMARY:**

Valley Educational Associates, Inc. (VEA) was established in 1982 as a nonprofit corporation that provides employment; community-based day supports (CBDS) and behavioral services to individuals with developmental disabilities. VEA, headquartered in Hatfield, operates three community-based day support sites located in Chicopee, Springfield, and Hatfield. Through its employment services, VEA also offers opportunities for individuals to work at various community businesses. The current licensing and certification review was based on a sampling of individuals who receive services from VEA through contracts with DDS.

As an organization, VEA demonstrated success in meeting licensure requirements for services and supports in the areas of environmental safety, workforce competency and personal safety. An onsite

review of the three day supports locations found the environments were clean and well-maintained and appliances were in good repair. Review of agency's systems for maintaining workforce competency found that the agency's tracking system was effective in ensuring that all training requirements were completed. The system tracked all staff training, including new mandated trainings in universal precautions and procedures for preventing virus transmission. Additionally, emergency backup plans were in place for each individual and all incident and restraint reports were submitted within the required timelines.

In the area of healthcare, healthcare protocols were in place for individuals with significant health conditions, and medication was administered in compliance with Medication Administration Program (MAP) policies.

As an additional positive finding in licensing, it was noted that VEA continued to maintain effective data collection systems to track ISP objectives, behavioral data, and individuals' participation in onsite and community-based activities, as well as time worked. The consistent data allowed VEA to determine how well individuals were doing overall in their services, and whether any changes were needed. Staff were knowledgeable about each individual's ISP, assisted with goal implementation, and consistently tracked all required data on a daily basis.

Within certification domains, positive practices were found in the areas of choice and control, and communication. VEA staff regularly solicited input from individuals individually and in group settings about upcoming activities and daily schedules. Staff used this input to plan upcoming skill groups, leisure activities, and community outings. Individuals' daily schedules had a block of time when they could engage in preferred on-site activities individually or with others. In addition, individuals provided feedback on employee evaluations and had ongoing opportunities to inform the agency about their satisfaction with services through regular discussions with staff.

In addition to the positive findings outlined above, the survey also identified some licensing areas in need of further attention. In the area of personal safety, fire drills need to be conducted within the approved staff ratio in accordance with the approved safety plan. For healthcare, individuals receiving behavior modifying medications must have an accompanying medication treatment plan in place. Within the context of human rights, the human rights committee needs to maintain regular attendance of all members, including those with required expertise, and fulfill its responsibilities in promoting and protecting the rights of individuals who receive services. Additionally, restrictive practices intended for one individual that affect all individuals served at a location need to have a written rationale and have provisions so as not to unduly restrict the rights of others. With regards to the ISP, the agency needs to ensure required ISP assessments as well as provider support strategies are submitted to DDS within the established timelines. In addition, individuals need to be assessed to identify assistive technology that may be of benefit to maximize their independence in work or day activities.

Within areas subject to certification within community-based day supports, individuals could benefit from further support to explore community activities that will promote greater community involvement, developing connections and building relationships. For individuals on the track to employment, the agency needs to develop methods to assist individuals with exploring job interests as well as assessing skills and support needs. Additionally, comprehensive career plans need to be written in a manner that outlines the training and supports needed to accomplish the identified job goals. The agency also needs to develop a mechanism to provide information to individuals on the impact of earned income on benefits and entitlements. Individuals should also have a formal opportunity to provide feedback on the hiring of support staff across service types.

Organizationally, the agency needs to develop a strategic plan through which service improvement goals are identified, benchmarks are set, and progress tracked with adjustments being made as necessary.

As a result of the review, VEA will receive a Two-Year License for Employment and Day Supports, with a service group score of 89%. This service group is Certified with a Mid-cycle Progress Report with an overall score of 63% of certification indicators met. Follow-up will be conducted by OQE within 60 days on all licensing indicators that received a rating of Not Met.

#### **LICENSURE FINDINGS**

|   | Met / Rated | Not Met / Rated | % Met |
|---|-------------|-----------------|-------|
| Organizational  | 9/10        | 1/10            |       |
| Employment and Day Supports                                 | 50/56       | 6/56            |       |
| Community Based Day Services<br>Employment Support Services |             |                 |       |
| Critical Indicators   | 8/8         | 0/8             |       |
| Total   | 59/66       | 7/66            | 89%   |
| 2 Year License  |             |                 |       |
| # indicators for 60 Day Follow-up                           |             | 7               |       |

#### Organizational Areas Needing Improvement on Standards not met/Follow-up to occur:

| Indicator # | Indicator   | Area Needing Improvement   |
|-------------|---|--|
| L48         | The agency has an effective Human Rights Committee. | The agency's human rights committee lacked regular attendance in three roles for the majority of meetings, to include one with required expertise. Additionally, procedures for quorum were not followed when quorum was not present, and human rights training materials and processes, and agency policies/procedures with regards to human rights were not reviewed.  VEA needs to support its human rights committee to meet attendance requirements and to fulfill its responsibilities in promoting and protecting the rights of individuals who receive services. |

#### Employment/Day Areas Needing Improvement on Standards not met/Follow-up to occur:

| Indicator<br># | Indicator | Area Needing Improvement  |
|----------------|-----------|---|
| L7             | required. | In one of three locations reviewed, fire drills were not being conducted in accordance with the Emergency Evacuation Safety Plan. The agency needs to ensure individuals are able to evacuate in a timely manner within the staffing ratio approved by DDS. |

| L56            | Restrictive practices intended for one individual that affect all individuals served at a location need to have a written rationale that is reviewed as required and have provisions so as not to unduly restrict the rights of others. | At one location, there was a restriction on access to toilet paper that did not have a written rational and there was no mitigation plan in place for those impacted by the restriction. When a restriction is necessary to protect individuals' health or safety, the agency needs to ensure that there is a written rational, the restriction is reviewed by the human rights committee and that plans are in place to mitigate the impact of restrictions on those individuals who do not require them. |
|----------------|---|--|
| L63            | Medication treatment plans are in written format with required components.  | For the one individual receiving medication requiring a medication treatment plan, there was no plan on-site. The agency needs to ensure that medication treatment plans are in place for medications prescribed to control individuals' behaviors. This includes identifying the behaviors for treatment in observable and measurable terms, specific procedures to minimize risks of taking the medication, clinical indications for adjusting the medication, and frequency of data collection.         |
| L86            | Required assessments concerning individual needs and abilities are completed in preparation for the ISP.  | For nine of thirteen individuals reviewed, ISP assessments were not submitted to DDS within 15 days prior to the ISP. The agency needs to ensure that ISP assessments are submitted to DDS within 15 days prior to the ISP.  |
| L87            | Support strategies necessary to assist an individual to meet their goals and objectives are completed and submitted as part of the ISP.   | For eight of thirteen individuals reviewed, provider support strategies were not submitted to DDS within 15 days prior to the ISP. The agency needs to ensure that provider support strategies are submitted to DDS within 15 days prior to the ISP.   |
| L94<br>(05/22) | Individuals have assistive technology to maximize independence.   | For nine of fourteen individuals reviewed, support needs and the potential benefits of assistive technology had not been assessed. The agency needs to ensure that all individuals are assessed to identify assistive technology to maximize independence and provide these supports when a need is identified.  |

## **CERTIFICATION FINDINGS**

|   | Met / Rated | Not Met / Rated | % Met |
|---|-------------|-----------------|-------|
| Certification - Planning and Quality Management | 1/6         | 5/6             |       |
| Employment and Day Supports                     | 25/35       | 10/35           |       |
| Community Based Day Services                    | 11/15       | 4/15            |       |
| Employment Support Services                     | 14/20       | 6/20            |       |
| Total   | 26/41       | 15/41           | 63%   |
| Certified with Progress Report                  |             |                 |       |

#### Planning and Quality Management Areas Needing Improvement on Standards not met:

| Indicator # | Indicator   | Area Needing Improvement   |
|-------------|---|--|
| C2          | The provider analyzes information gathered from all sources and identifies patterns and trends.                           | The agency did not analyze data collected from external or internal sources, including review of incident reports, medication occurrence reports, or results of investigations, to establish patterns and trends for service improvement. The agency needs to develop effective methods of analyzing data for patterns and trends. Goals for service improvement need to be developed and prioritized through this analysis. |
| C3          | The provider actively solicits and utilizes input from the individuals and families regarding satisfaction with services. | The agency did not utilize input gathered from guardians and involved families on service satisfaction. The agency needs to develop a process for compiling input received from guardians and families on service satisfaction and overall service quality that can be utilized to inform goals for service improvement.   |
| C4          | The provider receives and utilizes input received from DDS and other stakeholders to inform service improvement efforts.  | The agency was not utilizing information obtained through meetings with DDS and other stakeholders to make changes or develop service improvement goals. The agency needs to develop a method to compile and analyze input from DDS and stakeholders and utilize in a manner which supports their efforts towards service improvement.   |

| C5 | The provider has a process to measure progress towards achieving service improvement goals.                                       | The agency did not implement effective methods of internal evaluation to identify goals for service improvement. In addition, data on service quality collected from satisfaction surveys and DDS licensing reviews was not used to establish service improvement goals. Effective methods of internal evaluation must be developed, and data collected from these sources, including satisfaction surveys, should be used to inform and prioritize service improvement goals. The agency needs to implement a course of action in improving the quality of its services, using benchmarks established to measure progress. |
|----|---|---|
| C6 | The provider has mechanisms to plan for future directions in service delivery and implements strategies to actualize these plans. | The agency did not have a strategic plan in place. The agency needs to develop a strategic plan to include measurable benchmarks for strategic planning goals as well as effective methods of tracking progress and accomplishment of strategic goals and initiatives or need for mid-course adjustment if necessary.   |

## Community Based Day Services- Areas Needing Improvement on Standards not met:

| Indicator # | Indicator  | Area Needing Improvement  |
|-------------|--|---|
| C7          | Individuals have opportunities to provide feedback at the time of hire / time of the match and on an ongoing basis on the performance/actions of staff / care providers that support them. | Three of the seven individuals reviewed did not have the opportunity to provide formal input on the hiring of the staff who support them. The agency needs to develop mechanisms for incorporating individuals' input into the process of hiring the staff who support them.  |
| C42         | Individuals are involved in activities that connect them to other people in the community.   | Two of the seven individuals reviewed were not supported to become involved in activities that would connect them with people on their community. The agency needs to assist individuals with identifying areas of interest that would promote greater community involvement. |
| C43         | Staff act as bridge builders to support individuals to develop, sustain, and enhance relationships with others.  | Two of seven individuals reviewed had not been supported to develop or maintain relationships with others. The agency needs to provide opportunities for all individuals to expand their  |

|     |  | network of social contacts and personal relationships.   |
|-----|--|--|
| C44 | Staff have effective methods to assist individuals to explore their job interests if appropriate.  | None of the three individuals reviewed had been supported to explore their job interests. The agency needs to regularly assess individuals' job interests and explore those interests identified for individuals.  |
| C7  | Individuals have opportunities to provide feedback at the time of hire / time of the match and on an ongoing basis on the performance/actions of staff / care providers that support them. | Two of the seven individuals did not have the opportunity to provide formal input on the hiring of the staff who support them. The agency needs to develop mechanisms for incorporating individuals' input into the process of hiring the staff who support them.  |
| C22 | Staff have effective methods to assist individuals to explore their job interests.   | For the six individuals reviewed, the agency did not demonstrate it had effective methods to assess and explore individuals' job interests. The agency needs to regularly assess individuals' job interests and explore those interests identified for individuals.  |
| C23 | Staff utilize a variety of methods to assess an individual's skills, interests, career goals and training and support needs in employment.   | None of the six individuals reviewed had been assessed to identify their work-related strengths, skills, or needs for training. The agency needs to develop an effective means of assessing individuals' strengths and skills related to their job interests.  |
| C24 | There is a plan developed to identify job goals and support needs.   | None of the six individuals reviewed had comprehensive career plans in place that identified their specific job goals, strengths, and support needs. The agency needs to develop a mechanism for consistently providing individuals with a written plan reflecting their job goals and support needs.  |
| C26 | Career planning includes an analysis of how an individual's entitlements can be managed in a way that allows them to work successfully in the community.                                   | None of the six individuals reviewed had been supported to understand how their current and future earnings may affect their entitlements and there was no mechanism in place to share this information with family or guardians. The agency needs to provide individuals, their guardians, and families with information on the potential impact of employment earnings on entitlements and other benefits. |

| C35 | Individuals are given feedback on job performance by their employer. | Two of three individuals reviewed had not been provided feedback from the employer on their job performance. The agency needs to ensure individuals are receiving regular feedback on their job performance and |
|-----|--|---|
|     |  | that feedback is given in a manner commensurate with other employees.   |

#### MASTER SCORE SHEET LICENSURE

## Organizational: VALLEY EDUCATIONAL ASSOCIATES

| Indicator # | Indicator               | Met/Rated | Rating(Met,Not<br>Met,NotRated) |
|-------------|-------------------------|-----------|---------------------------------|
| ₽ <b>L2</b> | Abuse/neglect reporting | 4/4       | Met                             |
| L3          | Immediate Action        | 5/5       | Met                             |
| L4          | Action taken            | 3/3       | Met                             |
| L48         | HRC                     | 0/1       | Not Met(0 % )                   |
| L65         | Restraint report submit | 7/7       | Met                             |
| L66         | HRC restraint review    | 7/7       | Met                             |
| L74         | Screen employees        | 1/1       | Met                             |
| L75         | Qualified staff         | 1/1       | Met                             |
| L76         | Track trainings         | 4/4       | Met                             |
| L83         | HR training             | 4/4       | Met                             |

## **Employment and Day Supports:**

| Ind.#           | Ind.                      | Loc. or<br>Indiv. | Emp.<br>Sup. | Cent.<br>Based<br>Work | Com.<br>Based<br>Day | Total<br>Met /<br>Rated | Rating               |
|-----------------|---------------------------|-------------------|--------------|------------------------|----------------------|-------------------------|----------------------|
| L1              | Abuse/neglect<br>training | I                 | 6/7          |                        | 7/7                  | 13/14                   | Met<br>(92.86 %)     |
| L5              | Safety Plan               | L                 |              |                        | 3/3                  | 3/3                     | Met                  |
| <sup>₽</sup> L6 | Evacuation                | L                 |              |                        | 3/3                  | 3/3                     | Met                  |
| L7              | Fire Drills               | L                 |              |                        | 2/3                  | 2/3                     | Not Met<br>(66.67 %) |
| L8              | Emergency Fact<br>Sheets  | I                 | 5/6          |                        | 6/7                  | 11/13                   | Met<br>(84.62 %)     |

| L9<br>(07/21)    | Safe use of equipment      | I | 7/7 | 7/7 | 14/14 | Met              |
|------------------|----------------------------|---|-----|-----|-------|------------------|
| L10              | Reduce risk interventions  | I | 1/1 | 1/1 | 2/2   | Met              |
| <sup>₽</sup> L11 | Required inspections       | L |     | 3/3 | 3/3   | Met              |
| <sup>₽</sup> L12 | Smoke detectors            | L |     | 3/3 | 3/3   | Met              |
| <sup>₽</sup> L13 | Clean location             | L |     | 3/3 | 3/3   | Met              |
| L14              | Site in good repair        | L |     | 2/2 | 2/2   | Met              |
| L15              | Hot water                  | L |     | 3/3 | 3/3   | Met              |
| L16              | Accessibility              | L |     | 3/3 | 3/3   | Met              |
| L17              | Egress at grade            | L |     | 3/3 | 3/3   | Met              |
| L18              | Above grade egress         | L |     | 1/1 | 1/1   | Met              |
| L20              | Exit doors                 | L |     | 3/3 | 3/3   | Met              |
| L21              | Safe electrical equipment  | L |     | 3/3 | 3/3   | Met              |
| L22              | Well-maintained appliances | L |     | 3/3 | 3/3   | Met              |
| L25              | Dangerous substances       | L |     | 3/3 | 3/3   | Met              |
| L26              | Walkway safety             | L |     | 3/3 | 3/3   | Met              |
| L28              | Flammables                 | L |     | 3/3 | 3/3   | Met              |
| L29              | Rubbish/combustibles       | L |     | 3/3 | 3/3   | Met              |
| L30              | Protective railings        | L |     | 1/1 | 1/1   | Met              |
| L31              | Communication method       | I | 7/7 | 7/7 | 14/14 | Met              |
| L32              | Verbal & written           | I | 7/7 | 7/7 | 14/14 | Met              |
| L37              | Prompt treatment           | I | 7/7 | 7/7 | 14/14 | Met              |
| ₽ L38            | Physician's orders         | I | 2/2 | 7/7 | 9/9   | Met              |
| L39              | Dietary requirements       | I | 1/1 | 2/2 | 3/3   | Met              |
| L44              | MAP registration           | L |     | 3/3 | 3/3   | Met              |
| L45              | Medication storage         | L |     | 3/3 | 3/3   | Met              |
| <sup>₽</sup> L46 | Med. Administration        | I |     | 6/6 | 6/6   | Met              |
| L49              | Informed of human rights   | I | 6/7 | 7/7 | 13/14 | Met<br>(92.86 %) |
| L50<br>(07/21)   | Respectful Comm.           | I | 7/7 | 7/7 | 14/14 | Met              |
| L51              | Possessions                | I | 7/7 | 7/7 | 14/14 | Met              |

| L52                            | Phone calls                  | I | 7/7 | 7/7 | 14/14  | Met                  |
|--------------------------------|------------------------------|---|-----|-----|--------|----------------------|
| L54<br>(07/21)                 | Privacy                      | I | 7/7 | 7/7 | 14/14  | Met                  |
| L56                            | Restrictive practices        | I | 0/4 | 0/2 | 0/6    | Not Met<br>(0 %)     |
| L57                            | Written behavior plans       | I | 4/4 | 7/7 | 11/11  | Met                  |
| L60                            | Data maintenance             | I | 4/4 | 7/7 | 11/11  | Met                  |
| L61                            | Health protection in ISP     | I | 2/2 | 3/3 | 5/5    | Met                  |
| L62                            | Health protection review     | I |     | 1/1 | 1/1    | Met                  |
| L63                            | Med. treatment plan form     | I |     | 0/1 | 0/1    | Not Met<br>(0 %)     |
| L77                            | Unique needs training        | I | 6/7 | 6/7 | 12/14  | Met<br>(85.71 %)     |
| L78                            | Restrictive Int.<br>Training | L |     | 2/2 | 2/2    | Met                  |
| L79                            | Restraint training           | L |     | 3/3 | 3/3    | Met                  |
| L80                            | Symptoms of illness          | L |     | 3/3 | 3/3    | Met                  |
| L81                            | Medical emergency            | L |     | 3/3 | 3/3    | Met                  |
| <sup>№</sup> L82               | Medication admin.            | L |     | 3/3 | 3/3    | Met                  |
| L84                            | Health protect.<br>Training  | I | 2/2 | 3/3 | 5/5    | Met                  |
| L85                            | Supervision                  | L |     | 3/3 | 3/3    | Met                  |
| L86                            | Required assessments         | I | 3/6 | 1/7 | 4/13   | Not Met<br>(30.77 %) |
| L87                            | Support strategies           | I | 3/6 | 2/7 | 5/13   | Not Met<br>(38.46 %) |
| L88                            | Strategies implemented       | I | 7/7 | 7/7 | 14/14  | Met                  |
| L91                            | Incident management          | L |     | 3/3 | 3/3    | Met                  |
| L93<br>(05/22)                 | Emergency back-up plans      | I | 7/7 | 7/7 | 14/14  | Met                  |
| L94<br>(05/22)                 | Assistive technology         | I | 3/7 | 2/7 | 5/14   | Not Met<br>(35.71 %) |
| #Std.<br>Met/# 56<br>Indicator |                              |   |     |     | 50/56  |                      |
| Total<br>Score                 |                              |   |     |     | 59/66  |                      |
|                                |                              |   |     |     | 89.39% |                      |

#### **MASTER SCORE SHEET CERTIFICATION**

## **Certification - Planning and Quality Management**

| Indicator # | Indicator                        | Met/Rated | Rating        |
|-------------|----------------------------------|-----------|---------------|
| C1          | Provider data collection         | 1/1       | Met           |
| C2          | Data analysis                    | 0/1       | Not Met (0 %) |
| C3          | Service satisfaction             | 0/1       | Not Met (0 %) |
| C4          | Utilizes input from stakeholders | 0/1       | Not Met (0 %) |
| C5          | Measure progress                 | 0/1       | Not Met (0 %) |
| C6          | Future directions planning       | 0/1       | Not Met (0 %) |

## **Community Based Day Services**

| Indicator # | Indicator                                     | Met/Rated | Rating            |
|-------------|---|-----------|-------------------|
| C7          | Feedback on staff / care provider performance | 4/7       | Not Met (57.14 %) |
| C8          | Family/guardian communication                 | 7/7       | Met               |
| C13         | Skills to maximize independence               | 7/7       | Met               |
| C37         | Interpersonal skills for work                 | 4/4       | Met               |
| C38 (07/21) | Habilitative & behavioral goals               | 3/3       | Met               |
| C39 (07/21) | Support needs for employment                  | 3/3       | Met               |
| C40         | Community involvement interest                | 6/7       | Met (85.71 %)     |
| C41         | Activities participation                      | 7/7       | Met               |
| C42         | Connection to others                          | 5/7       | Not Met (71.43 %) |
| C43         | Maintain & enhance relationship               | 5/7       | Not Met (71.43 %) |
| C44         | Job exploration                               | 0/3       | Not Met (0 %)     |
| C45         | Revisit decisions                             | 4/4       | Met               |
| C46         | Use of generic resources                      | 7/7       | Met               |
| C47         | Transportation to/ from community             | 7/7       | Met               |
| C51         | Ongoing satisfaction with services/ supports  | 7/7       | Met               |

#### **Employment Support Services**

| Indicator # | Indicator                                     | Met/Rated | Rating            |
|-------------|---|-----------|-------------------|
| C7          | Feedback on staff / care provider performance | 5/7       | Not Met (71.43 %) |
| C8          | Family/guardian communication                 | 7/7       | Met               |
| C22         | Explore job interests                         | 0/6       | Not Met (0 %)     |
| C23         | Assess skills & training needs                | 0/6       | Not Met (0 %)     |
| C24         | Job goals & support needs plan                | 0/6       | Not Met (0 %)     |
| C25         | Skill development                             | 6/6       | Met               |
| C26         | Benefits analysis                             | 0/6       | Not Met (0 %)     |
| C27         | Job benefit education                         | 6/6       | Met               |
| C29         | Support to obtain employment                  | 5/6       | Met (83.33 %)     |
| C30         | Work in integrated settings                   | 3/3       | Met               |
| C31         | Job accommodations                            | 5/5       | Met               |
| C32         | At least minimum wages earned                 | 5/5       | Met               |
| C33         | Employee benefits explained                   | 5/5       | Met               |
| C34         | Support to promote success                    | 5/5       | Met               |
| C35         | Feedback on job performance                   | 1/3       | Not Met (33.33 %) |
| C36         | Supports to enhance retention                 | 5/5       | Met               |
| C37         | Interpersonal skills for work                 | 7/7       | Met               |
| C47         | Transportation to/ from community             | 7/7       | Met               |
| C50         | Involvement/ part of the Workplace culture    | 3/3       | Met               |
| C51         | Ongoing satisfaction with services/ supports  | 7/7       | Met               |