

# **Ohio Department of Developmental Disabilities**

**John L. Martin, Director**  
**Kathryn Haller, Deputy Director**  
**Kelly Miller, Assistant Deputy Director**

## **OFFICE OF PROVIDER STANDARDS AND REVIEW**

**DIVISION OF  
LEGAL AND OVERSIGHT**

### **ANNUAL REPORT**

**January 1, 2011 – December 31, 2011**

**The mission of the Ohio Department of Developmental Disabilities is continuous improvement of the quality of life for Ohio's citizens with developmental disabilities and their families.**

## TABLE OF CONTENTS

### OFFICE OF PROVIDER STANDARDS AND REVIEW

Ensuring Positive Outcomes	3
Types of Compliance Reviews	4
2011 Review Totals	5
Most Common Areas of Non-Compliance Statewide	6
Training provided in 2011	7
Compliance Reviews of Licensed Settings	8 - 9
License Terms	10
Development	11
Compliance Reviews of Non-Licensed Settings	12 - 13
Adult Day Services	14
Compliance Reviews of County Boards of DD	15
Adverse Outcomes	16
Medicaid Fraud	
Suspension, Revocation and Abeyance	
Agency Sanctions	17 - 18
Independent Provider Sanctions	19 - 20
Comparable Sanction Data 2007 - 2011	21
Offenses Resulting in Sanctions	22

# Ensuring Positive Outcomes

The Office of Provider Standards and Review strives to ensure that Ohio citizens with disabilities experience outcomes that reflect that they are healthy, safe and satisfied with their waiver services from Ohio Providers. **The following ten points exhibit the focus of our review process to make sure that those outcomes are met.**

- 1) The provider assures that training/certification requirements are met.
- 2) The provider assures that background check requirements are met.
- 3) The provider assures services are implemented in accordance with the ISP.
- 4) The provider meets waiver assurances such as free choice of provider, ISP development and Protective Level of Care/Level of Care.
- 5) The provider assures physical environments meet the needs of individuals and federal, state and local requirements.
- 6) The provider assures that UI/MUI requirements are met.
- 7) The provider promotes dignity and protects the rights of individuals served.
- 8) Individuals are satisfied with the services they receive.
- 9) Individuals are able to access needed or desired services.
- 10) Individuals are able to resolve disputes with providers.

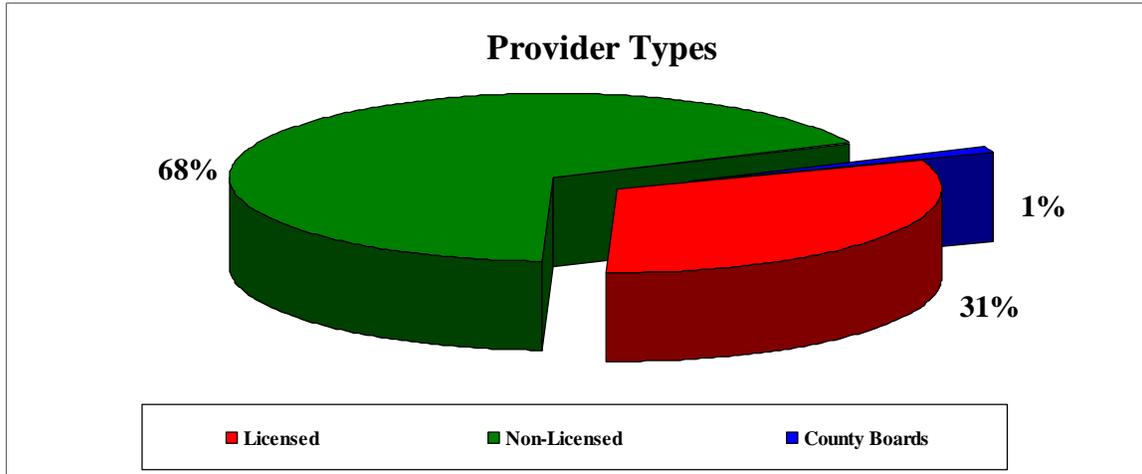
## Types of Compliance Reviews

OPSR conducts compliance reviews in licensed waiver funded settings, unlicensed waiver funded settings, licensed Intermediate Care Facilities for the Intellectually Disabled (ICFs/DD), and County Board settings. **In order to ensure consistency, the review process and tools used are the same in all settings.**

- **Compliance Review** – a regularly scheduled review of a provider conducted prior to the end of the provider’s term license, accreditation term or at least once every 3 years for non-licensed waiver settings. The review is conducted utilizing the single review tool.
- **Special Compliance Review** – an unscheduled review, which occurs due to identified concerns such as complaints, Major Unusual Incidents or adverse outcomes identified by other entities such as the Ohio Department of Health or the Ohio Department of Job and Family Services.
- **New to the System Review** – a compliance review that occurs within one year of a new waiver provider’s initial submission of waiver billing.
- **Feasibility Review** – a review conducted prior to the licensing of a new facility to ensure compliance with physical environment standards.
- **Initial Reviews**– a review conducted within 45 days of the opening of a newly developed residential facility. Initial reviews result in a 1-year term license.
- **Plan of Compliance Verification** – a follow-up, performed either on-site or as a desk review to ensure that the provider has implemented the Plan of Compliance submitted in response to a compliance review.

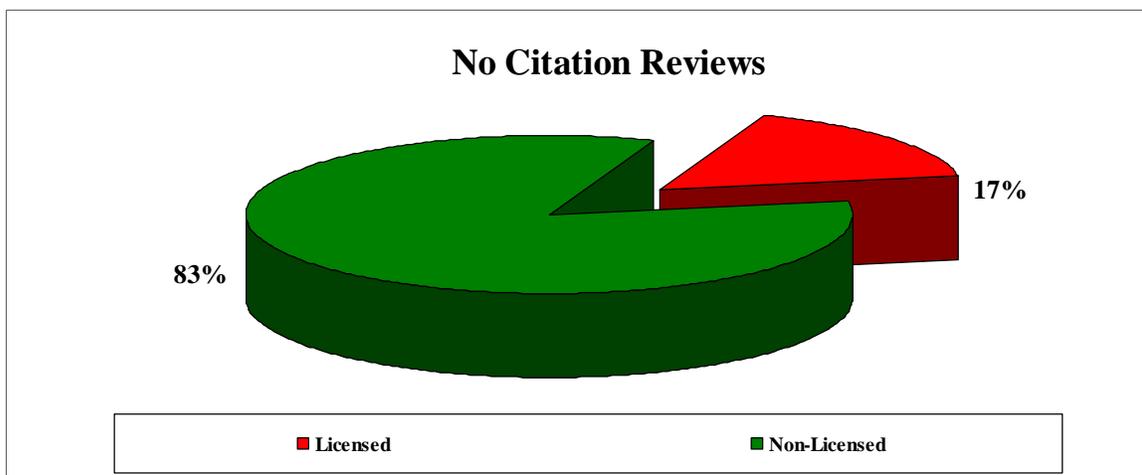
# 2011 Review Totals

The Office of Provider Standards and Review is made up of a staff of 42 employees, 29 of which are the Review Specialists who conduct the reviews. In 2011, the office conducted a total of 1,710 reviews throughout the state.



Licensed Settings (both Waiver Funded & ICF/DD)	534
Non-Licensed Waiver Settings	1,158
County Board of Developmental Disabilities	<u>18</u>
<b>Total Reviews</b>	<b>1,710</b>

DODD is proud to recognize that of the 1,710 reviews conducted in 2011, 843, or 49%, of the reviews resulted in No Citations to the provider.



Licensed Settings (both Waiver Funded & ICF/DD)	141
Non-Licensed Waiver Settings	702
<b>Total Reviews</b>	<b>843</b>

## **MOST COMMON AREAS OF NON – COMPLIANCE STATEWIDE**

### **Independent Providers Top Citations**

- Did the provider have annual MUI training?
- Did the provider have annual training on the Rights of Individuals with DD?
- Did the Provider have current CPR certification?
- Does the waiver service delivery documentation for all waiver services include all the required elements?

### **Agency Providers (including County Boards as service providers)Top Citations**

- Did the Provider staff have a Nurse Aide Registry check completed prior to direct contact with individuals?
- Is the Service Plan being implemented as written?
- Did the Provider maintain a log of unusual incidents which includes;
  - Name of the individual
  - Description of the incident
  - Identification of injuries
  - Time/Date of incident
  - Preventative measures
- Did the provider staff have an abuser registry check completed prior to direct contact with individuals with DD?
- For direct service staff, hired after 10/1/09, did the staff person receive initial training prior to providing services with individuals that included:
  - Overview of serving individuals with developmental disabilities
  - Overview of basic principles and requirements of providing HCBS waiver services
  - Initial Rights Training
  - Initial MUI Training
  - Universal Precautions

### **ICFDD Providers Top Citations**

- Is the IP implemented as written?
- Medications, treatments and dietary orders are being followed?
- Are the interior and exterior and grounds of the building maintained in good repair and in a clean and sanitary manner?
- Did the ICF/DD staff complete a BCII check on staff prior to direct contact with individuals?
- Is there evidence that the ICF/DD notified the county board about the below listed incidents within 4 hours of discovery?
  - Abuse
  - Exploitation
  - Misappropriation
  - Neglect
  - Suspicious/Accidental Death
  - Media Inquiry

# Trainings Provided by OPSR in 2011

In 2011, OPSR staff provided training to the field on various topics. In all, 672 constituents received training throughout the state.

TOPIC	LOCATION	DATE	# IN ATTENDANCE	TRAINERS
<b>Provider Compliance</b>	Columbus Developmental Center	01/05/11	5	OPSR STAFF
	Lucas County Board of DD	04/14/11	15	
	Summit County Board of DD	05/13/11	3	
	Columbus Developmental Center	06/14/11	2	
<b>Provider Certification</b>	Clermont County Board of DD	03/28/11	20	OPSR STAFF
<b>Review Process</b>	Lucas County Board of DD	06/14/11	8	OPSR STAFF
	Alvis House	08/25/11	47	
	Miami County Board of DD	09/21/11	29	
	APSI	12/06/11	10	
<b>Documentation Requirements/ Audits</b>	Aladdin Shrine in Columbus Webinar	09/14/11	50	OPSR & AUDITS STAFF
		10/25/11	40	
<b>Accreditation Process</b>	Ashland County Board of DD	03/15/12	15	OPSR STAFF
	Cuyahoga County Board of DD	04/19/11	20	
	OACB Spring Conference	05/19-20/11	20	
	Montgomery County Board of DD	06/30/11	15	
	Ashland County Board of DD w/OACB staff	07/18/12	12	
	OACB Winter Conference	12/2/11	25	
<b>Money Management</b>	OACB Spring Conference PAR Conference	05/19-20/11	20	OPSR & MUI STAFF
		10/07/11	65	
<b>Behavior Support</b>	Delaware County Board of DD	02/23/11	10	OPSR STAFF
<b>Guardianship/ Service Plans</b>	OACB SSA Forum in Columbus	08/25/11	241	OPSR STAFF

# OPSR Annual Report

## Compliance Reviews of Licensed Settings

**Waiver Funded Licensed Facilities** – A residential facility operated by a certified HCBS waiver provider, which is licensed by the Ohio Department of Developmental Disabilities and serves individuals with disabilities enrolled in an HCBS waiver program. The Ohio Revised Code, Section 5123.19, mandates reviews of all facilities licensed by the department. The review results in the licensee being issued a license to operate the facility. A facility may receive a 1, 2 or 3-year license based on the outcome of the review.

**Intermediate Care Facility for the Developmentally Disabled (ICF/DD)** – A residential facility, which is licensed by the Ohio Department of Developmental Disabilities and certified by the Ohio Department of Health. The Ohio Revised Code, Section 5123.19, mandates reviews of all facilities licensed by the department. The review results in the licensee being issued a license to operate the facility. A facility may receive a 1, 2 or 3-year license based on the outcome of the review.

**In 2011, there were 1,101 licensed facilities in operation.**

**Those facilities were categorized as:**

**10 Developmental Centers**

**415 ICF/DD Facilities**

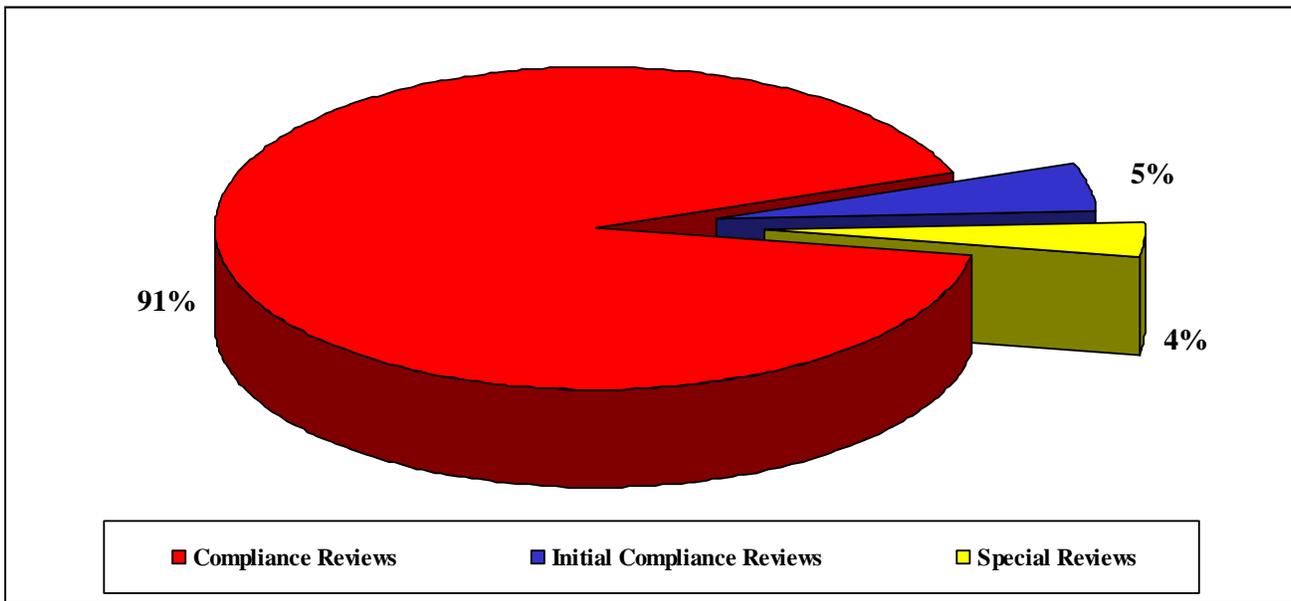
**676 Non-ICF/DD Facilities**

# OPSR Annual Report

## Compliance Reviews of Licensed Settings

Between January 1, and December 31, 2011, the department conducted 534 compliance reviews in licensed settings.

Of the 534 compliance reviews conducted during 2011, 489 were regular compliance reviews, 26 were initial reviews, and 19 were special reviews.

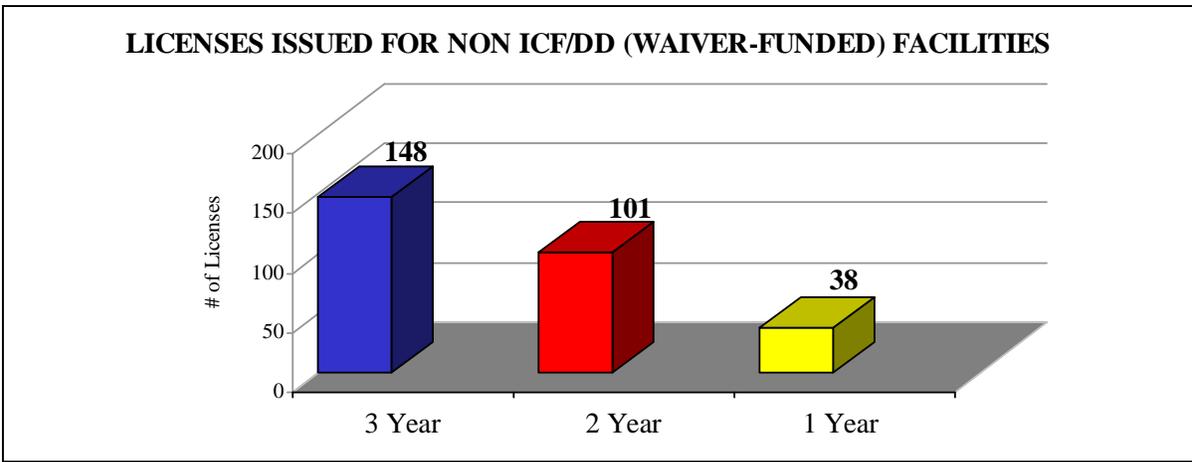
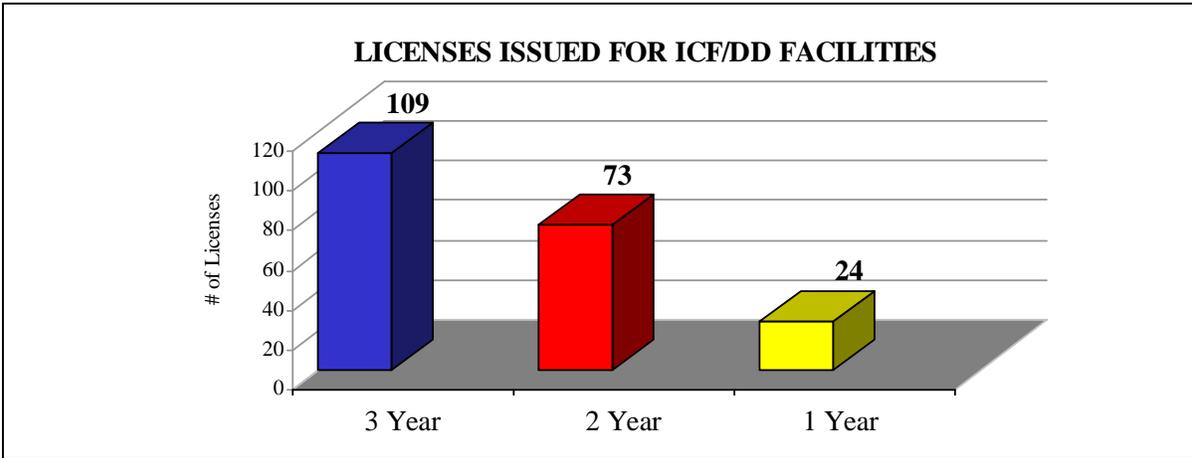


Compliance Reviews *	489
Initial Reviews*	26
Special Reviews	<u>19</u>
Total	534

\* Result in term licenses.

# LICENSE TERMS

Licenses issued for term between January – December 2011:

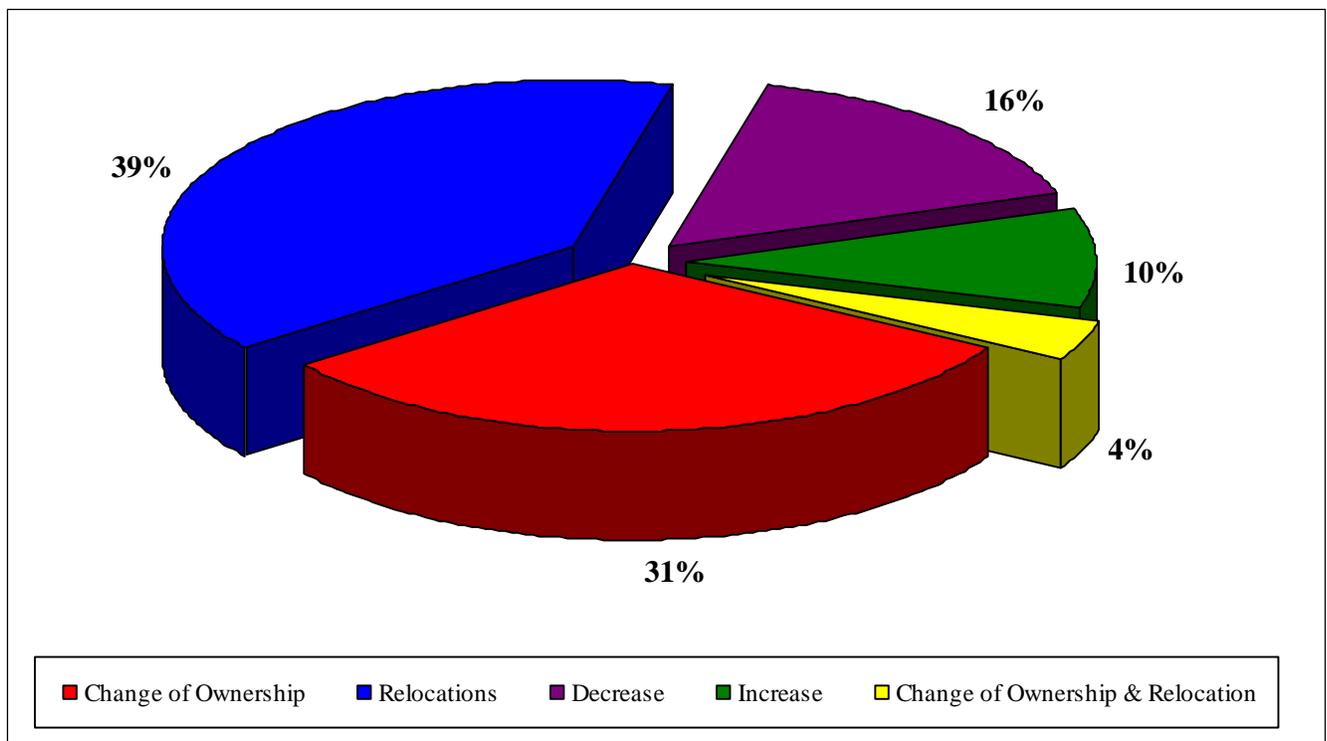


3 Year	257
2 Year	174
1 Year	62
<b>Total</b>	<b>493</b>

License terms are determined based on the results of Compliance Reviews. A facility undergoing an Initial Review will only be issued a one year term license.

## DEVELOPMENT

The State of Ohio has capped the maximum number of licensed beds available in the state. There are no new beds available for development, but existing beds can undergo changes such as relocation, change of ownership and increases and decreases in the capacity of a facility. The Ohio Department of Developmental Disabilities is committed to the vision of community based services for individuals with developmental disabilities and has worked hand in hand with providers to assist in the evaluation of development proposals. In 2011, OPSR processed 51 of these types of developments. For each development that resulted in the licensed beds being moved to another location, DODD is required to complete a feasibility review to ensure that the new facility meets the physical environment requirements outlined in the Ohio Administrative Code. In 2011, OPSR completed 19 feasibility reviews.



<u>Action Table</u>	
Relocations (entire facility relocates to a new location)	20
Change of Ownerships	16
Decrease in Capacity	8
Increase in Capacity	5
Change of Ownership & Relocation	2
<b>Total</b>	<b>51</b>

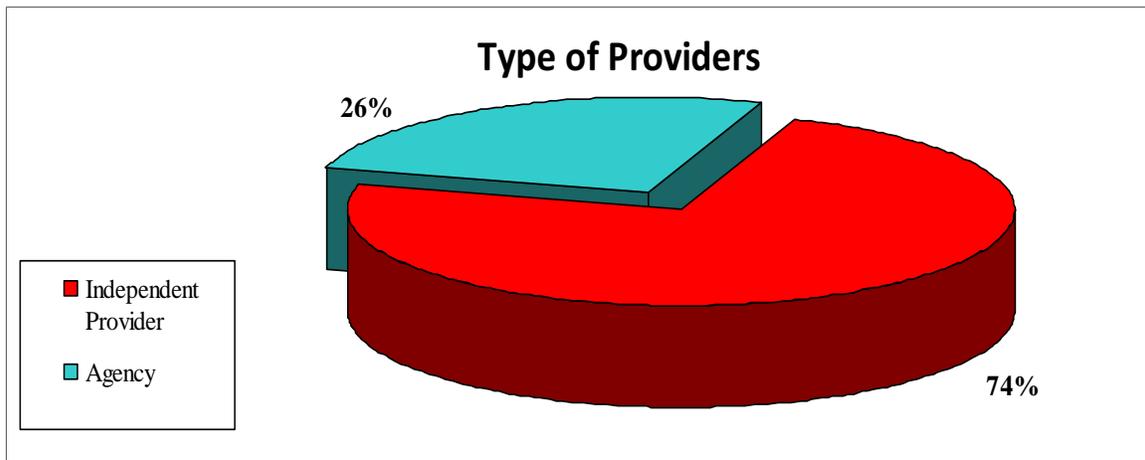
# OPSR Annual Report

## Compliance Reviews of Community-Based Waiver Services

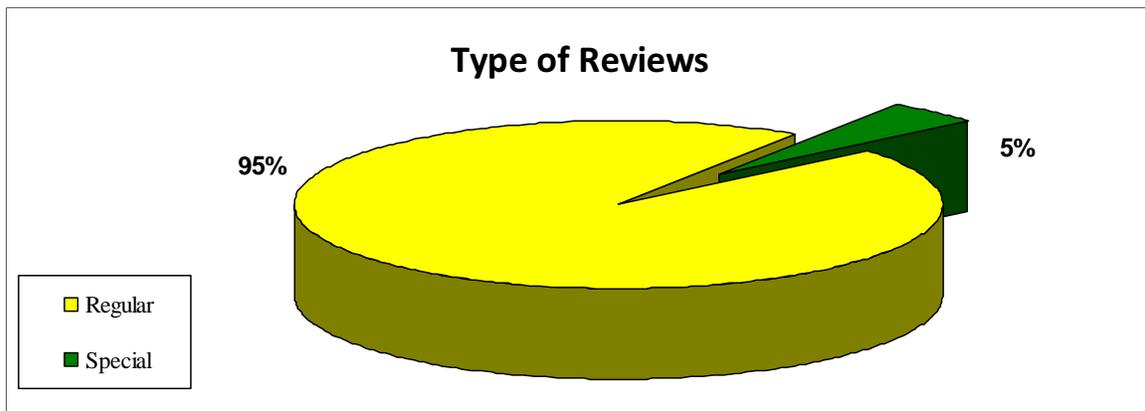
A variety of HCBS Services are provided in communities, homes and family homes of waiver recipients. Certified HCBS Waiver Providers deliver Homemaker Person Care, Transportation, Adult Day Services and ancillary services such as Environmental Modifications, Social Work, Nutrition and Adaptive Equipment.

Compliance reviews for HCBS providers are conducted by Ohio Department of Developmental Disabilities and by the County Boards of Developmental Disabilities. Ohio Administrative Code 5123:2-9-08 requires certified HCBS providers to be reviewed once during the period of certification to ensure compliance with continuing certification standards of the services provided.

In 2011, the department conducted **1,158 regular and special compliance reviews** of both Agency and Independent Providers in non-licensed settings. In 2011, there were 659 newly certified providers subject to review within the year after first billing. Of that total, 607 were reviewed, of which 92% were conducted within the year. Forty-two providers were revoked or relinquished their certification.



Agency Reviews	305
Independent Provider Reviews	853

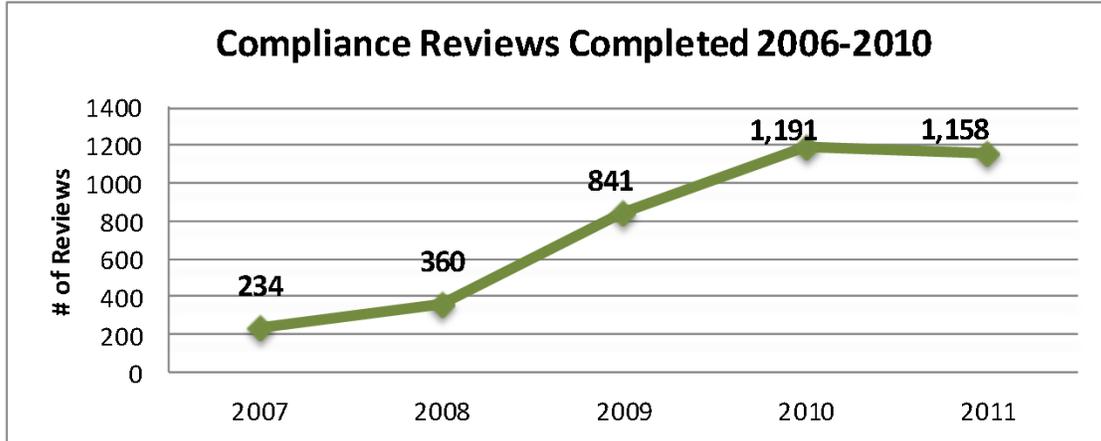


Regular Reviews	1,104
Special Reviews	54

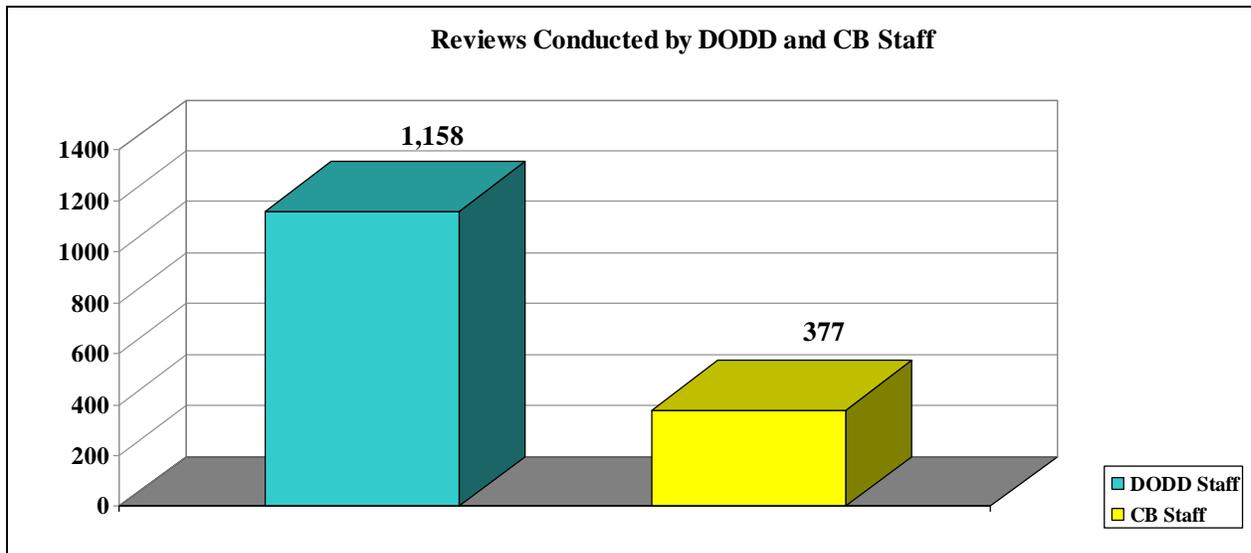
# OPSR Annual Report

## Compliance Reviews of Community-Based Waiver Services

The chart below highlights the increase in the number of compliance reviews community-based waiver services from 2006 through 2011.



In addition to the 1,158 reviews conducted by DODD review staff, there were 377 Provider Compliance reviews conducted by County Board staff around the state in 2011.



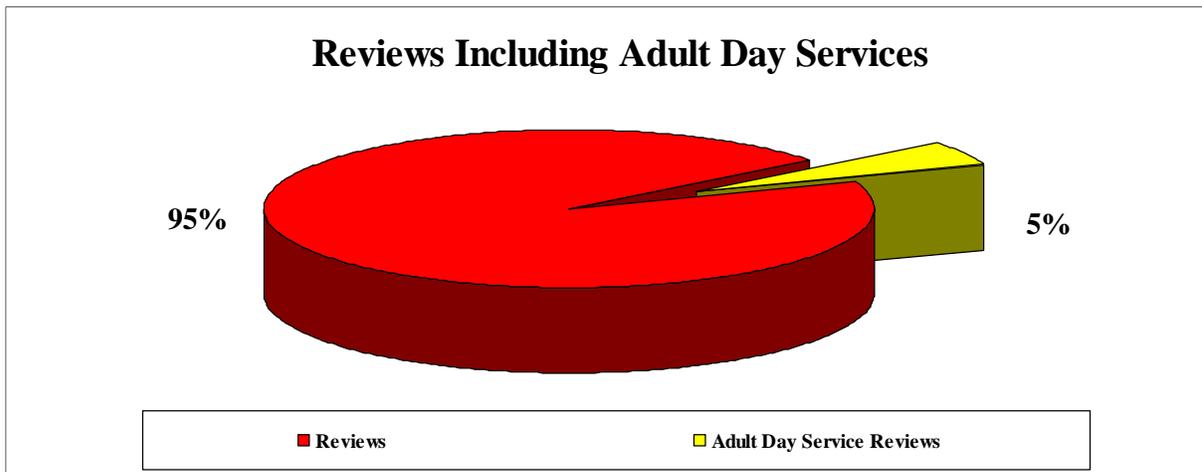
Reviews conducted by DODD staff	1,158
Reviews conducted by CB staff	<u>377</u>
	1,535

## Adult Day Services

Adult Day Service includes Adult Day Support, Vocational Habilitation, Supported Employment and Non-Medical Transportation. These services have provided individuals in Ohio with greater options for day services and employment; the opportunities and creative service ideas continue to grow.

In 2011, OPSR conducted 1,158 reviews. Of that total, 61 included a review of providers who **exclusively** deliver Day Services. Issues discovered during reviews of Adult Day Services in 2011 identified the following trends:

- Service plan does not clearly identify service needs, supervision levels or outcomes.
- Physical Environment.

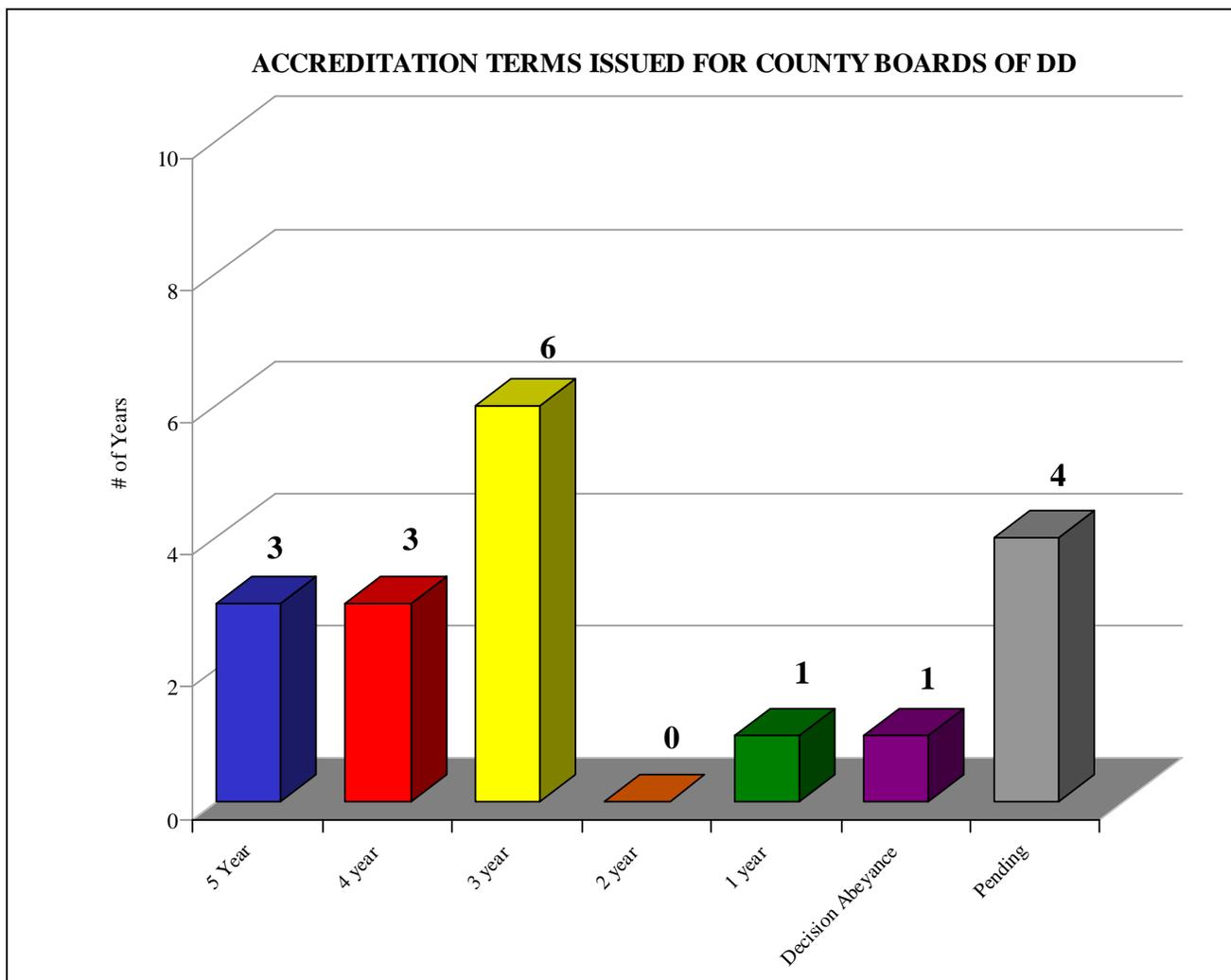


# OPSR Annual Report

## Compliance Reviews of County Boards of DD

**County Boards of DD** – the county boards have administrative oversight responsibilities for the delivery of services to individuals with disabilities in each county of the state. In addition to administrative oversight, a County Board of DD may also be a certified HCBS waiver provider of adult day services to individuals with developmental disabilities within the county. The administrative oversight of the delivery of services is reviewed for all County Boards of DD and for those County Boards which are also certified as an HCBS waiver provider. The County Board undergoes the same review process as a any certified provider of waiver services.

Eighteen counties were reviewed in 2011. The results of those surveys are as follows:



# **ADVERSE OUTCOMES**

## **Medicaid Fraud**

The Ohio Department of Developmental Disabilities is committed to identifying and eliminating fraud. We view it as our collective responsibility to safeguard the limited resources available to Ohio Medicaid recipients. Providers are responsible for ensuring that Medicaid billings are accurate and that they are only billing for services for which they are authorized through the Individual Service Plan (ISP) and have provided. The County Boards and Councils of Government (COGs) provide local oversight and monitoring to ensure services are provided in accordance with the plan. Additional oversight is provided by the Department. The Department receives referral information regarding possible fraudulent activity and presents it to the Office of the Attorney General through bi-weekly Medicaid Fraud Control Unit Meetings.

In 2011, seven DODD certified providers were convicted of Medicaid fraud, which is a 30% decrease from the previous year when ten DODD certified providers were convicted of Medicaid fraud. Additionally, DODD made 12 referrals to the Attorney General's Office for possible fraudulent activities. A conviction of Medicaid fraud results in revocation of the provider's certification and/or license.

## **Suspension, Revocation and Abeyance**

The Department of Developmental Disabilities is committed to educating providers of the standards that must be followed and assisting them in maintaining compliance with rules through technical assistance and support. However, in some cases when good cause exists, the Department may initiate sanctions against a provider. Suspension or revocation proceedings of a provider's certification(s) or license(s) may be initiated if the Department finds one or more of the following:

- Substantial violation(s) of applicable requirements when violation(s) present a risk to an individual's health and welfare
- A pattern of non-compliance with either plans of compliance that have been accepted by the county board or those plans of compliance that the department has approved in accordance with this rule
- A pattern of continuing non-compliance with applicable requirements
- A licensed provider has had their license revoked by the licensing authority
- Other good cause, including misfeasance, malfeasance, nonfeasance, confirmed abuse or neglect, financial irresponsibility, or other conduct the director determines is injurious to individuals being served
- Placement on the Abuser Registry
- Conviction of Medicaid Fraud

## AGENCY SANCTIONS – JANUARY 1 – DECEMBER 31, 2011

The following charts identify sanctions imposed on **Agency Providers** (for both *licensed settings* and providers of waiver services in *non-licensed settings*), as well as **Independent Waiver Providers**. They are separated by ‘Suspension Issued Only’, ‘Suspension & Revocation Issued’ and ‘Revocation Issued Only’ for both groups.

### SUSPENSION ISSUED ONLY

<u>Provider</u>	<u>Suspension Imposed</u>	<u>Suspension Lifted</u>
<i>The following Agency Suspensions were <u>resolved</u> in 2011 - total: 19</i>		
New Option Dayhab	07/14/10	02/24/11
Complete Home Health Services, Inc.	09/01/10	06/28/11
Marli Cline Homes, Inc	09/09/10	04/28/11
Agape Care Services	11/29/10	02/24/11
Alternative Residential Treatment, Ltd	12/16/10	06/15/11
Whittington-Clark Associates, LLC	01/10/11	06/28/11
Highest Expectations, LLC	01/19/11	04/05/11
New Millenium Home Health, LLC	02/03/11	02/17/11
Access Provider Services, LLC	02/11/11	06/28/11
Whitehaven Farm, LLC	03/17/11	04/21/11
Wilson Residential Services	04/15/11	06/22/11
Wilson Residential Services/2nd Street Home	04/15/11	06/22/11
Wilson Residential Services/Green Street Home	04/15/11	06/22/11
Caretenders of Cleveland dba Almost Family Medlink of Ohio	05/10/11	12/08/11
Hearts of Hope Institute, Inc.	06/22/11	09/13/11
Caring Supported Independence	06/28/11	12/01/11
Anne Grady Corp.	08/18/11	09/22/11
Your Independence, Inc.	08/18/11	11/10/11
Respite Connections, Inc.	09/15/11	10/20/11
<i>The following Agency Suspensions were <u>pending</u> as of 12/31/11 - total: 11</i>		
High Hopes Home #3	03/24/10	
High Hopes Home #4	03/24/10	
High Hopes Home #5	03/24/10	
Granger Home #1	05/03/10	
Granger Home #2	05/03/10	
Adult Latch Key	08/17/10	
McKinney Homes, Inc.	10/11/11	
MKW Respite Connections, Inc.	11/14/11	
New Hope and Horizons	11/14/11	
Creative Living Solutions	12/06/11	
Ford Care Services	12/20/11	

# AGENCY SANCTIONS – JANUARY 1 – DECEMBER 31, 2011

## SUSPENSION & REVOCATION INITIATED

<u>Provider</u>	<u>Suspension/Revocation Imposed</u>	<u>Suspension Lifted</u>	<u>Revocation Withdrawn</u>
<i>The following Agency Certifications Suspension was <u>lifted</u> in 2011 - total: 1</i>			
Potter Family Home	06/28/10 / 09/2/10	01/05/11	09/20/10
<i>The following Agency Revocation was <u>withdrawn</u> in 2011 - total: 1</i>			
Inter Responsive in Situ - IRIS I	02/23/11	*	04/07/11
* Suspension still in effect on 12/31/11			

<u>Provider</u>	<u>Suspension/Revocation Imposed</u>	<u>Revocation Adjudicated</u>
<i>The following Agency Suspensions &amp; Revocations were <u>adjudicated</u> in 2011 - total: 7</i>		
Community Choices & Opportunities	10/26/10	02/25/11
A-Ever Ready Transportation, Inc.	11/05/10	03/25/11
Common Courtesy Transportation LLC	01/05/11	05/13/11
Shelda Corporation	01/10/11	07/26/11
True Providers	01/12/11	03/25/11
Turner Home Care Staffing	02/04/11 - 06/23/11	12/07/11
Loveless Hardwood Flooring LLC	03/10/11	05/13/11
<i>The following Agency Suspensions &amp; Revocations were <u>pending</u> as of 12/31/11 - total: 7</i>		
Victory Day Hab	07/27/10	
Evergreen Health Care Serv, Inc	12/01/10	
Alternative Residential Treatment, Ltd (ART)	12/16/10	
Caring Hands of Stark	05/03/11	
Gary Granger Agency	05/10/11	
Flanders Group Home	06/22/11	
Lawrence Loving Hands Staffing Agency, Inc. & Lawrence Day Hab	07/05/11	

## REVOCATION INITIATED ONLY

<u>Provider</u>	<u>Revocation Imposed</u>	<u>Revocation Adjudicated</u>
<i>The following Agency Revocation was <u>adjudicated</u> in 2011 - total: 1</i>		
Adult Latch Key, Inc.	02/11/11	05/13/11
<i>The following Agency Revocations were <u>pending</u> as of 12/31/11 - total: 6</i>		
Granger Home #1	05/10/11	
Granger Home #2	05/10/11	
High Hopes Homes	06/27/11	
High Hopes Homes #3	06/27/11	
High Hopes Homes #4	06/27/11	
High Hopes Homes #5	06/27/11	

# INDEPENDENT PROVIDER SANCTIONS – JANUARY 1 – DECEMBER 31, 2011

## SUSPENSION ISSUED ONLY

<u>Provider</u>	<u>Suspension Imposed</u>	<u>Suspension Lifted</u>
<i>The following Independent Provider Suspensions were <u>lifted</u> as of 12/31/11 - total: 2</i>		
Shelly Miller-Perkins	11/18/10	03/15/11
Hamidou Fofana	09/20/11	10/05/11
<i>The following Independent Provider Suspension was <u>pending</u> as of 12/31/11 - total: 1</i>		
Hervie Jackson	06/13/11	

## SUSPENSIONS & REVOCATIONS INITIATED

<u>Provider</u>	<u>Suspension/Revocation Imposed</u>	<u>Certifications Revoked</u>
<i>The following Independent Provider Suspensions &amp; Revocations were <u>adjudicated</u> in 2011 - total: 31</i>		
Rochelle Brown	09/08/10	02/25/11
Frederick Burks	09/14/10	05/13/11
Linda Holbrook	10/12/10	03/09/11
Dona Rhodes	10/12/10	03/25/11
Sheria Russ	10/26/10	02/22/11
Bethany Peters	11/05/10	03/25/11
Renee Blackmon	11/05/10	02/22/11
Robert Thielmeyer	11/08/10	02/22/11
Suiping Ma	11/19/10	02/22/11
Lily Lee	11/19/10	02/22/11
Jason Brown	11/19/10	02/22/11
Eric Birnesser	12/10/10	03/09/11
Jody Danes	01/31/11	03/25/11
Mark Geygan	01/19/11	05/13/11
Julie Mayle	01/19/11	05/13/11
Diane Collins	01/26/11	05/13/11
Demarlah Perkins	01/31/11	03/25/11
Mary Jane Blackwell	02/01/11	03/25/11
Jade Mihelarakis	02/01/11	05/13/11
Madonna Fambrough	02/11/11	05/13/11
Kelly Winchell	02/15/11	07/05/11
Felicia Lucas	03/10/11	08/31/11
April Johnson	04/15/11	07/26/11
Jacqueline Shoemake	04/26/11	07/26/11
Starla King	04/26/11	07/26/11
Trazell Garner	05/02/11	09/01/11
Nora Coleman	05/10/11	07/26/11
Karen Lint	05/10/11	10/18/11
Lucia Koon	06/03/11	07/26/11
Tina Copley	07/15/11	10/18/11
Carolyn Parker	07/15/11	10/18/11

# INDEPENDENT PROVIDER SANCTIONS – JANUARY 1 – DECEMBER 31, 2011

## SUSPENSIONS & REVOCATIONS INITIATED (continued)

<u>Provider</u>	<u>Suspension/Revocation Imposed</u>	<u>Relinquished Certifications</u>
<i>The following Independent Provider <u>relinquished</u> their Certifications in 2011 - total: 1</i>		
Tanya Reed	10/20/10	03/31/11

<u>Provider</u>	<u>Suspension/Revocation Imposed</u>	<u>Suspension Lifted/Revocation Withdrawn</u>
<i>The following Independent Provider Sanctions were <u>resolved</u> in 2011 - total: 2</i>		
John Gagner	12/10/10	01/25/11
Alfred Perry	01/19/11	03/02/11

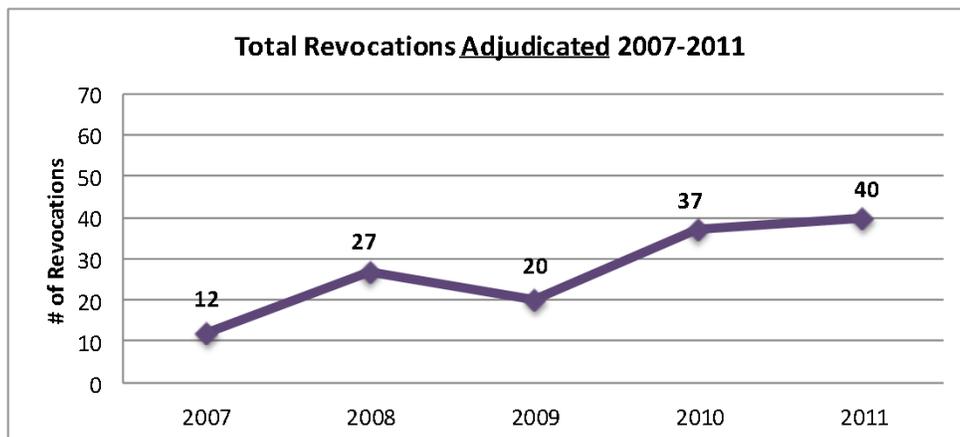
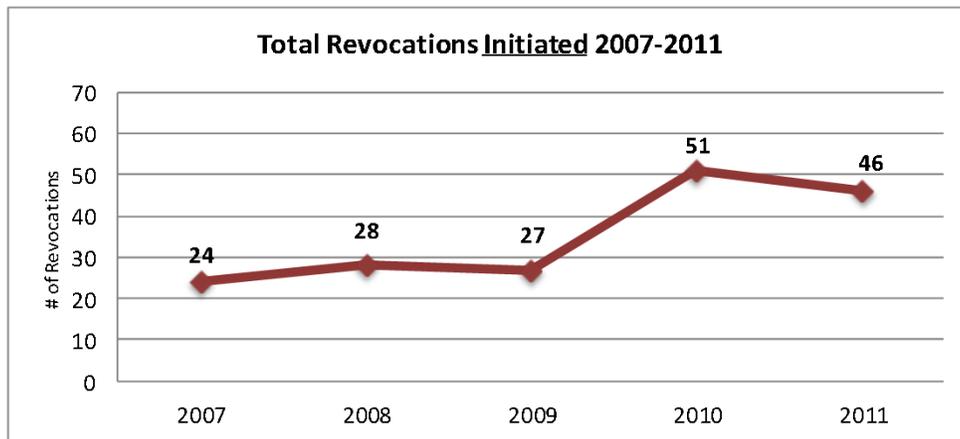
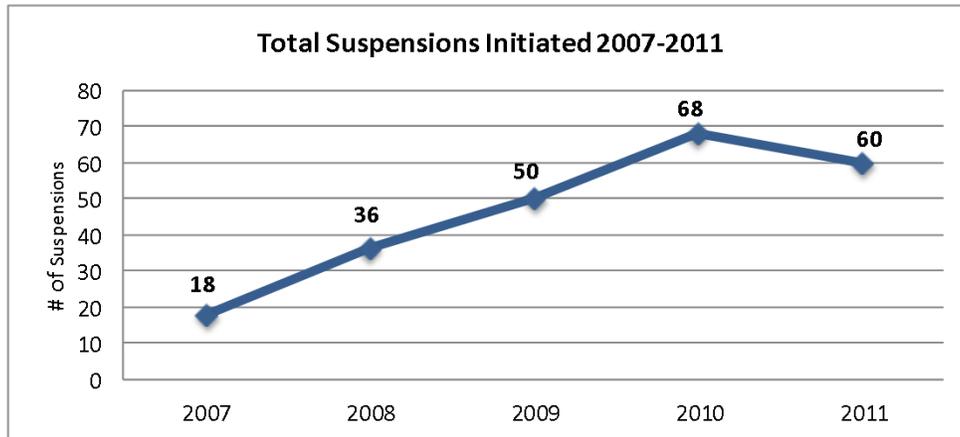
<u>Provider</u>	<u>Suspension/Revocation Imposed</u>	<u>Certifications Revoked</u>
<i>The following Independent Provider Suspensions &amp; Revocations were <u>pending</u> as of 12/31/11 - total: 9</i>		
Sharon Haas	02/01/11	
Demetrius Boyd	5/9/11 - 9/1/11	
Penny Barnes	06/07/11	
Marcia Patton	06/13/11	
Mickey Harris	07/08/11	
Christina Albus	07/15/11	
Christopher Sanders	08/25/11	
Christina Douglas	11/01/11	
Zachary McDavid	12/06/11	

## REVOCATIONS INITIATED ONLY

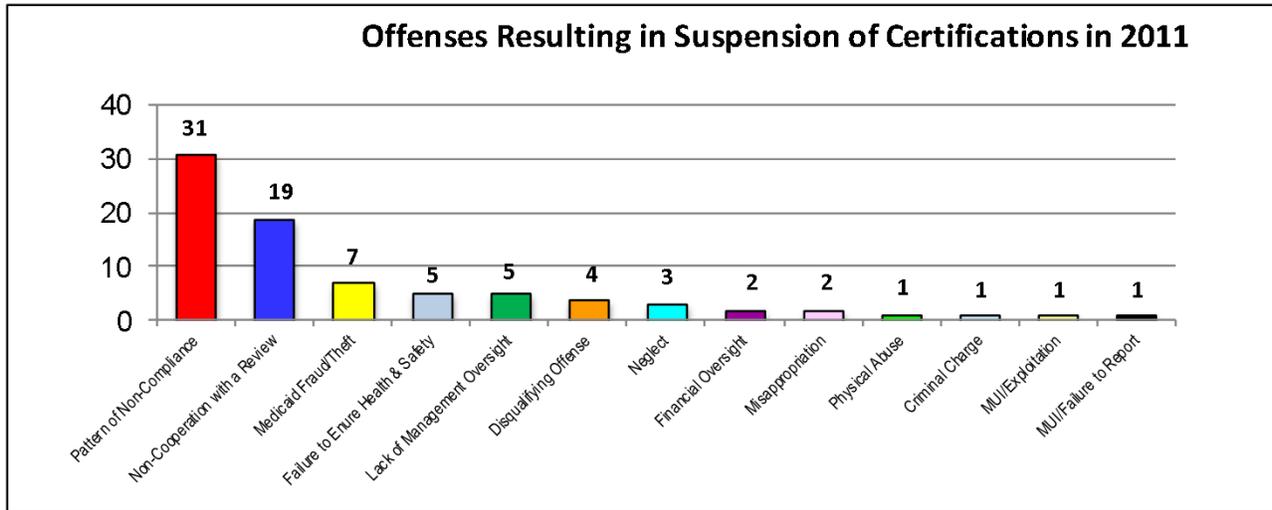
<u>Provider</u>	<u>Revocation Imposed</u>	<u>Revocation Adjudicated</u>
<i>The following Independent Provider Revocations were <u>adjudicated</u> in 2011 - total: 2</i>		
Crystal Abrams	12/13/2010	02/14/11
Kendra Holiman-Jackson	12/29/2010	03/25/11
<i>The following Independent Provider Revocation was <u>pending</u> as of 12/31/11 - total: 1</i>		
Mark Crisp	07/20/11	

## Comparable Sanction Data 2007 - 2011

In 2011, OPSR *initiated* 60 suspensions of certifications and/or licenses and 46 revocation notifications. Forty revocations were *adjudicated*. The charts below show the sanction statistics over the past five years.

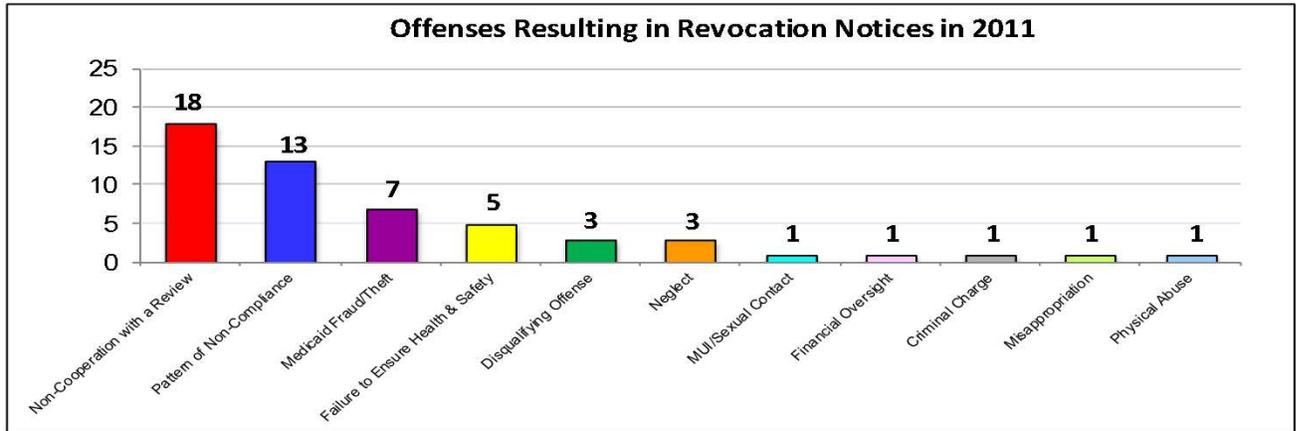


## Offenses Resulting in Sanctions in 2011



Pattern of Non-Compliance	31
Non-Cooperation with a Review	19
Medicaid Fraud/Theft	7
Failure to Ensure Health & Safety	5
Lack of Management Oversight	5
Disqualifying Offense	4
Neglect	3
Financial Oversight	2
Misappropriation	2
Physical Abuse	1
Criminal Charge	1
MUI/Exploitation	1
MUI/Failure to Report	1
<b>TOTAL</b>	<b>82*</b>

\* Fifteen providers were issued suspensions due to multiple offenses



Non-Cooperation with a Review	18
Pattern of Non-Compliance	13
Medicaid Fraud/Theft	7
Failure to Ensure Health & Safety	5
Disqualifying Offense	3
Neglect	3
MUI/Sexual Contact	1
Financial Oversight	1
Criminal Charge	1
Misappropriation	1
Physical Abuse	1
<b>TOTAL</b>	<b>54*</b>

\* Nine providers were issued revocation notices due to multiple offenses