Introduction-what NARA will talk about

• Key Indicator System – NARA Consultative Support Plan –

• NARA provided/will provide:
  o Consultative support services related to the development and implementation of the key indicator project
  o Reviewed data analysis and provided feedback on developed tools & procedures
  o Staff training
  o Post-project evaluation
Definitions

• **Full Inspection**: Is a review of all pieces of legislation.
• **Focused Inspection**: A review of the key indicators (26 pieces of legislation)
• **Inspecting Coding Guide**: Checklist for compliance with the 26 pieces of legislation
Why Study and Measurement Systems?

• The ‘science and art’ as it relates to regulatory administration and licensing functions;
• Measurement is a new key element in our “information age”;
• Basis for:
  o design and implementation of information systems; (SCIENCE)
  o Conducting on-site inspections including making observations, interviewing and completing investigations.
The Key Indicator methodology evolved from a request by the United States Federal Government, the Department of Health, Education and Welfare (HEW) in 1977 to come up with an abbreviated or short form of their Federal Interagency Day Care Requirements (FIDCR). Staff from the department approached Dr Richard Fiene and Dr Susan Aronson, both of whom were working on a new program monitoring and evaluation system in Pennsylvania called the Child Development Program Evaluation (CDPE). At a meeting in Washington DC, Dr Fiene proposed the idea taken from the tests and measurement field of how to utilize key indicators to make predictions to a larger assessment instrument.
Brief History KIS (cont)

• In 1979 - 1984, Dr Fiene received a large research grant to develop his ideas more fully and several publications.

• Five states (Pennsylvania, Michigan, New York, California, and West Virginia) began testing the key indicator methodology during this period and the original outcome validation study was conducted in 1987.

• During the 1990’s, several other states became interested in the methodology, in particular the risk assessment portion of the methodology.
Brief History of KIS (cont)

• In 2000, the National Association for Regulatory Administration (NARA) asked Dr Fiene and Karen Kroh to write a chapter explaining the methodology for the NARA Licensing Curriculum.

• In 2013, Dr Fiene created the Research Institute for Key Indicators (RIKI) in order to consolidate all research being done on key indicators and risk assessment since a great deal of work was being done at that point (http://rikinstitute.com). In 2015, NARA and RIKI formed an exclusive partnership on the future development and dissemination of the methodologies which had expanded into a formalized method of differential monitoring.
 Brief History of KIS (cont)

• Since that time, NARA has been taken over more of the development and dissemination of the methodologies (https://www.naralicensing.org/key-indicators).

• **Science**
  • The key indicator and risk assessment methodologies are tried and tested methods borrowed from the tests and measurement as well as program evaluation fields. Both methodologies are statistically based and have been refined and tested over 40 years since being originally proposed by Dr Richard Fiene in 1977.
  
• The methodologies have been validated or are being validated repeatedly over the years in the US
Brief History of KIS (cont)

• Measures, Outputs and Outcome validation studies have been performed on the methodologies to make certain that they are working as they should
Key Indicator System

• **What is a Key Indicator System for Licensing?**
• A shortened version of a more comprehensive licensing inspection instrument designed to measure compliance with a smaller number of rules, while predicting high compliance with all the rules.

• Key Indicator Systems are a kind of **targeted measurement tool.** Targeted measurement tools are licensing inspection instruments that increase the **effectiveness and efficiency** of a regulatory oversight agency without producing recurring operational work. In other words, targeted measurement tools maximize performance.
Differential Monitoring
Definitions-Differential Monitoring

• **Differential Monitoring**: Uses all three types of measurement tools to determine the frequency and scope of routine inspections.

• **BC Provincial Risk Assessment Tool**: A review of the facility history and compliance to determine the frequency of inspections based on the facilities risk score.

• **Key Indicator**: Key indicators are the regulations that were identified as “good predictors” that can statistically predict overall compliance.

• **Quality Indicator Regulations**: In addition to the “good predictors”, Fraser Health identified a subset of existing regulations to predict the overall quality of care provided by a licensed setting.
Understanding Key Indicator Methodology

• Sort licensing data into high and low groups based on facility compliance
• A comparison is then made between the compliance of the high and low group with each rule.
• Apply **Fiene Key Indicator Coefficient** formula to determine if the rule is a “key indicator” or not
• Select a set of Key Indicators based on regulations which obtain the best coefficient values
How did Fraser Health analyze the data?

• In 2017, the Population Health Observatory was requested to identify specific regulations which are reliable key indicators based on Dr. Fiene’s formula. The following data was analyzed:
  o Two most recent Routine inspections
  o Facilities operating for less than two years were excluded
  o Reliable Key Indicator regulations were identified for both child care and residential care programs

• FH Population Health Observatory reran the data in March of 2019 to finalize the key indicators for the focused inspection
Current Inspection Format

- All licensed facilities receive an annual Routine Inspection
- Provincial Risk Assessment Tool determines risk category:
  - The Risk Assessment Tool is comprised of two parts: Part A - the Inspection Risk Assessment which is based on the comprehensive routine compliance inspection (the current/point in time inspection) and Part B - the Operational History Assessment (previous 3 years of operation). Both Parts A & B must be completed to create a Facility Risk Score
    - LOW
    - MODERATE
    - HIGH
- Additional discretionary follow up inspections are conducted by LO’s
Now the New Format: Key Indicator Licensing Inspection System

• All facilities are not treated equally; qualifying facilities will receive a focused inspection using key indicators.

• **Criteria***
  • A low risk rating for 2 consecutive years
  • At least 2 full routine inspections have been conducted after issuance of licence
  • No open investigations levelled at “moderate” or “high” potential risk
  • No high or moderate risk complaints have had substantiated related contraventions within the last 12 months
  • No high or moderate risk reportable incidents have had substantiated contraventions within the last 12 months
  • No enforcement activity against the Licensee within the last three years (e.g. suspension, conditions attached, or removal of exemption)
Now the New Format: Key Indicator Licensing Inspection System (cont)

• Key Indicator Licensing Inspection Procedures and Tools
  o Qualifying criteria
  o Focused Inspection Coding Guide
  o Inspection Flow Chart

• Non-Qualifying facilities receive a full routine inspection

• Qualifying facilities receives a full routine inspection every three years in addition to their annual focused inspection.
Question:

• How are stars like false teeth?
Answer:

- They both come out at night
Checks & Balances

- The facility needs to meet the criteria
- A focused inspection can be expanded to a full routine. For example:
  - If a critical hazard has been identified
  - If 2 more key indicator regulations are contravened
- A full inspection will be conducted every 3 years.
- The random indicators are selected annually
- The Population Health Observatory runs a revised report every 3 years to obtain the reliable key indicators
Managing Risk

• Managing Risk
  o Whether the project is implementing a new technology or a new process, risk plays a major factor in whether the business stakeholders will move forward with the proposed change.
  o The reality is that every “company” is different and there is some level of risk in implementing something new.
  o The pilot project can be used as an opportunity to implement the solution in a limited capacity where the impact of difficulty is limited.
  o Once a pilot project is executed, the risks that were identified at the beginning of the project can be evaluated in terms of the actual solution being implemented. (this will be addressed by your team-practice consultants)
The Benefits of Key Indicator Systems

• The regulatory oversight agency is able to spend more time monitoring and providing technical assistance to noncompliant providers by spending less time in compliant programs.

• Providers benefit from shorter inspections by maintaining compliance.

• Persons in care enjoy a higher degree of health and safety protection.

• The public is assured that strong licensing continues even if resources are reduced.
The Benefits of Key Indicator Systems

**Compliments** but does not replace the current licensing program.

Intended to improve upon the strictly checklist systems.
The Benefits of Key Indicator Systems

• The licensing indicator system uses a tool designed to measure compliance with a small number of regulations that predicts compliance with all the regulations.

• The indicator regulations are selected based upon the statistical methodology, designed for this specific purpose. If a facility is in complete compliance with all the regulations selected and measured in the licensing indicator tool, high compliance with all the regulations is statistically predicted.
Post-project Evaluation

• NARA will be helping/assisting Fraser to validate the key indicator approach in which we are comparing comprehensive licensing reviews with the results obtained through abbreviated inspections via the key indicators
Change Management

- Understand, commit to, accept, and embrace changes
- Evangelize Change
  - Change is Hard!
    - The biggest hindrance to change in any organization is the people within it.
    - Regardless of how much you ‘sell’ the solution with statistics and qualitative benefits, there are always those that will only ‘believe it when they see it’
    - As such this can be a great approach to appeasing the dissenters of the organization and bringing them along as supporters
“Never doubt that a small group of thoughtful, committed citizens can change the world. Indeed, it is the only thing that ever has.” - Margaret Mead.
TRUST

• What is Trust?
  
  o firm belief in the reliability, truth, ability, or strength of someone or something
  
  o have confidence; hope
  
  o Is both an emotional and logical act
  
  o Predictability
    ▪ Trust means being able to predict what other people will do and what situations will occur. If we can surround ourselves with people we trust, then we can create a safe present and even better future..
  
  o We Feel Trust
Trust the Science

The key indicator and risk assessment methodologies are tried and tested methods borrowed from the tests and measurement as well as program evaluation fields. Both methodologies are statistically based and have been refined and tested over 40 years since being originally proposed by Dr Richard Fiene in 1977.
Science (cont)

- The methodologies have been validated or are being validated repeatedly over the years in the US (Pennsylvania, Washington, and Head Start) and Canada (Ontario and Saskatchewan). Standards, Measures, Outputs and Outcome validation studies have been performed on the methodologies to make certain that they are working as they should. For the interested reader, please go to the Research Institute for Key Indicators (RIKIIlc) (http://rikinstitution.com) for additional information and the studies that have been done over the years.
Question:

What do you call sad coffee?
Answer: Depresso
How to Determine if KIS is Working?

- showing an increase in number of inspection per month (or quarter, or what-have-you) since abbreviated inspections allow for more work to be done.
- demonstrating that more TA was able to be provided by freeing up inspector time.
- demonstrating that they were able to spend more time monitoring or assisting struggling or worrisome providers.
- showing an increase in provider satisfaction with the licensing experience due to shorter inspections and recognition of their quality through eligibility and successful indicator inspections.
How to Determine if KIS is Working?

• A measure of post-inspection process steps (e.g. time to create an inspection report, time between creation of report and transmission to the provider, time between transmission of the report to receipt of a corrective action plan, time between receipt of a corrective action plan and measuring compliance with plan), should show the times decrease

• More administrative time to devote to training, policy development, new initiatives, etc.
Illusion
Q: What is the “Worst Case Scenario” in an indicator/focused inspection?

A: The inspection is ultimately conducted as it normally would be.
Ensuring Health and Safety

- Your Data was analyzed over a period of years
- Team of Individuals researched and developed Policy
- Adding random rules to safeguard the integrity of the system and preserve ethical response by providers
- Can move to a full survey
- Remember the reason for the system
- Trust the Science
- Trust the Art
Some Final Words

Accept the Science
Embrace the NEW
Ask Questions
Trust your Gut
Thank you!

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-and of course-Dr. Rick Fiene