

**Quality Management System**

QMS Revision 3

07/01/2020

Compliance Officer

Available and uploaded via electronic copy in Connections Case Management One Drive

for the sole use of Connections Case Management LLC and

shall be reviewed annually and maintained in use until further notice

**Connections Case Management, LLC QMS**

1. Scope

This Quality Management System manual contains policies and procedures that have been developed and implemented at Connections Case Management, LLC and is written to comply with requirements of ISO 9001-2015. QMS is utilized to ensure adherence to all State of Indiana policies, procedures, and publications.

Scope: The effective implementation of Medicaid waiver services as selected by clients in accordance with 460 IAC and DDRS policies and procedures while providing access to community resources, advocating for all clients’ needs, and monitoring implementation of services and supports.

1. Normative References

The following documents, in whole or in part, are normatively referenced in this document and are indispensable for its application. For dated references, only the edition cited applies. For undated references, the latest edition of the referenced document (including any amendments) applies.

1. Terms and Definitions

For this QMS manual, the terms are defined as follows:

-The terms product and service/s may be used interchangeably throughout the manual.

-The term “organization’ will be used to represent Connections Case Management, LLC, Connections Case Management, and/or Connections

-QMS or “Quality Management System” refers to a system that is considered to have the following primary components: quality control, quality monitoring, and quality improvement. Quality control is a function of Indiana Administrative Code 460 and DDRS policies pertaining to Medicaid waiver services. Quality monitoring is focused on utilizing the best means possible to provide a quality service. Quality improvement uses both the quality control and monitoring in a PDCA (plan-do-check-act) method to consistently evaluate, check, and act on the implemented quality standards. The QMS uses these components to achieve consistency in the quality of service delivery.

1. Context of the Organization

4-1. Understanding the Organization and its Context

Connections Case Management, LLC advocates for individuals, educates individual and family member on waiver services and DDRS Policies and Procedures, completes face to face quarterly monitoring and is the fiduciary responsible entity for the State of IN CMS services. Connections Case Management, LLC has determined internal and external issues that are relevant to its purpose and its strategic direction that affect its ability to achieve the intended results of its QMS. Connections Case Management, LLC monitors and reviews information about these external and internal issues using different formats. Please see Issues Matrix.

4-2. Understanding the Needs and Expectations of Interested Parties

Connections Case Management, LLC has determined the relative interested parties to the QMS and their effect or potential effect on the organization’s ability to consistently provide services that meet customer and applicable statutory and regulatory requirements. Connections Case Management, LLC has further determined the requirements of said parties relative to the QMS. The organization shall monitor and review information about interested parties and their relevant requirements at minimum annually. Please see Interested Party Matrix below:

|  |  |  |
| --- | --- | --- |
| **Interested Party** | **Requirements of IP** | **Relative Service** |
| FSSA | 460 IAC and DDRS policies | All case management service delivery |
| Employees/Case Managers | Maintain caseload size and certifications | All case management service delivery |
| Waiver Certified Providers | Monitoring of provider services and documenting outcome | All case management service delivery |
| Owners/Managing Partners | Maintain quality growth and advocacy standards for each client | Case Management  Marketing  Community Relations |
| Community Resources/Providers | Knowledge and utilization of community resources for each client | Case Management-  Advocacy Role |
| Surveyors | Maintain accreditation per 460 IAC | All case management service delivery |
| Clients | Maintain waiver services | Case Management  Upper Management |

4-3. Determining the Scope of the QMS

Connections Case Management, LLC has determined the boundaries and applicability of the QMS considering the following:

-The internal and external issues determined in 4-1 and referred to in Issues Matrix 1

-The requirements of relevant interested parties determined and referred to in 4-2

-the services of the organization

Connections has applied all the requirements of this International Standard within the effective implementation of Medicaid waiver services as selected by clients in accordance with 460 IAC and DDRS policies and procedures while providing access to community resources, advocating for all clients’ needs, and monitoring implementation of services and supports.

The scope of the QMS is available and is maintained as documented information. The scope states the types of services covered and provides justification for any requirement of the International Standard that does not apply to the scope of the QMS. Conformity to the International Standard may only be claimed if the requirements determined as not being applicable do not affect Connections’ ability or responsibility to ensure the conformity of its service and the enhancement of customer satisfaction.

4-4. Quality Management System and its Processes

Connections Case Management LLC has established, implemented, maintained and continually improves the quality management system, including the processes needed and their interactions, in accordance with the requirements of the International Standard. Connections Case Management LLC adheres to all 460 IAC and DDRS policy requirement to provide service delivery and measures quality service based on those regulations. Connections Case Management LLC monitors quality service delivery continually through on time delivery of services, customer satisfaction/reviews, provider feedback, documentation of delivery, and annual review of case management service delivery to each client. To the extent necessary, Connections Case Management LLC maintains documented information to support the operation of its processes and retains documented information to have confidence that the processes are being carried out as planned.

1. Documents and data may be in hard copy or electronic form and dispersed/accessed as such. Processes and documents related to measurement and monitoring are identified as the following: 460 IAC and DDRS Policies, Employee Manual, Operations and Policy Manual
2. These processes shall occur during all case management service delivery, monitored monthly by direct supervision, measured annually by management, and continually improved through ongoing training.
3. 1:1 supervision forms, client surveys/feedback, 90-day/training evaluations, annual evaluations, monthly measurements of on time service delivery, training implementation and tracking, and case note documentation are the criteria and methods needed to ensure the effective operation and control of ongoing case management service delivery
4. Resources are continually available through hard copy or electronic form for all employees, access to direct supervisor/team lead is available during business hours, access to compliance and quality officer is available during business hours
5. Roles and responsibilities are assigned, and authorities determined for these processes
6. Risks and opportunities are determined in accordance with the requirements of 6-1
7. Processes and documentation are evaluated and improved continually per QMS

**Ongoing Case Note Documentation**

**Client Services Process**

**Intake Services Process**

**Hiring Process/CM Process**

1. Leadership

5-1. Leadership and Commitment

Connections Case Management LLC management team will display their leadership and commitment to the QMS and ongoing efforts for improvement by:

-taking accountability for the effectiveness of the QMS

-ensuring that quality policy and quality objectives are established for the QMS and are compatible with the context and strategic direction of the organization

-promoting the use of the process approach and risk-based thinking

-quality management meetings will review the established quality objectives and work towards continual improvement

-completing regular management review meetings

-communicating to all agency employees the importance of meeting state and regulatory guidelines

-communicating to all agency employees the importance of ongoing customer satisfaction

-supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility

The management team will review customer/client and applicable statutory and regulatory requirements to ensure Connections’ ongoing compliance. The management team will review our ongoing measurement tools to determine the risks and opportunities that can affect conformity of services and the ability to enhance customer satisfaction will be determined and addressed. Connections Case Management LLC will continue to maintain and improve case management delivery for each client.

5-2. Policy

Upper Management shall establish, implement, and maintain and quality policy that is appropriate to the purpose and context of the organization and supports its strategic direction. Quality policy shall provide a framework for setting quality objectives, include a commitment to satisfy applicable requirements, and include a commitment to continual improvement of the QMS.

The quality policy shall be available and maintained as documented information, be communicated, understood and applied within the organization and is available to all relevant interested parties, as appropriate. Communication will be in the form, but not limited to, the following:

-email announcements

-monthly newsletters

-scheduled monthly one on one meetings

-information sharing via closed media/Yammer

-ongoing trainings

Quality Policy and Intent: Connections Case Management LLC’s mission is to empower people with disabilities to create purposeful and meaningful lives by connecting clients to services and supports based on everyone’s interests, strengths, and needs with a promise to continually improve our quality management system.

5-3. Organizational Roles, Responsibilities, and Authorities

Upper management shall ensure that the responsibilities and authorities for relevant roles are assigned, communicated and understood within the organization. Case Managers must meet all knowledge and qualifications as outlined in IAC 460-6-5-5 and Connections Case Management LLC Employee Manual. Knowledge base should include but not be limited to: DDRS Manual Summer 2016 Case Management Service Definition 10.3 and meet all internal quality and timeline expectations. Connections Case Management LLC utilizes Compliance Officer who is responsible for ensuring that the quality policy is reviewed during management review process and that it is communicated throughout the organization. Knowledge base should include but not be limited to QMS and ISO 9001 2015 standards, internal audit process, management review form, continual improvement plan execution, corrective action plan implementation and all 460 IAC and DDRS policies and procedures as referenced in Connections Case Management LLC Employee Manual and Operations and Policy Manual.

Please see Organizational Chart with roles and responsibilities below:

**Organizational Chart with Roles and Responsibilities**

1. Planning

6-1. Actions to address risks/opportunities

When planning the QMS, Connections Case Management LLC considered all issues referred to in 4.1 and the requirements referred to in 4.2 and determined the risks and opportunities that need to be addressed to give assurance that the QMS can achieve its intended result(s); enhance desirable effects; prevent/reduce undesired effects; achieve improvement. Connections Case Management LLC shall plan actions to address all identified risks and opportunities and how to integrate and implement the actions into its QMS and evaluate the effectiveness of the identified actions. Actions taken to address risks and opportunities shall be proportionate to the potential impact on the conformity of services. Options to address risks can include: avoiding risks, taking risk to pursue an opportunity, eliminating the risk source, changing the likelihood or consequences, sharing the risk, or retaining risk by informed decision. Further, opportunities can lead to the adoption of new practices, building partnerships, using modern technology and other desirable and viable possibilities to address Connections or clients’ needs. Please see Risk/Opportunity Matrix (Sheet 2).

6-2. Quality Objectives and Planning to Achieve Them

Connections Case Management LLC ensures that quality objectives are established at relevant functions and levels within the organization. Connections also ensure that the quality objects are measurable and follow the processes needed for the QMS. Objectives shall:

-be consistent with the Employee Manual, Operations Manual, and quality policy

-be measurable

-take into account applicable requirements

-be relevant to conformity of services and to enhancement of customer satisfaction

-be monitored

-be communicated

-be updated as appropriate

Connections Case Management LLC shall maintain documented information on the quality objectives. Connections upper management team shall determine what will be done, what resources will be required, who will be responsible, when it will be completed and how the results will be evaluated to achieve its quality objectives. Upper management is responsible for establishing and maintaining the following quality objectives:

|  |  |  |  |
| --- | --- | --- | --- |
| Objectives & Targets | Goal | Actual Qtly Measure | Comments |
| Client in Services | 99% | 100% | LOCSI measurement |
| Client with active CCB | 100% | 99% | CCB ANN plan measurement |
| Case Note Completion | 100% | 99% | Billable case note measurement |
| Client Retention | 97% | 97% |  |
| Client Satisfaction | 4.5 | 4.91 | Annual client Surveys |
| Employee Retention | 80% | 92 % | Loss to another CMCO |
|  |  |  |  |

6-3. Planning of Changes

When Connections Case Management LLC determines the need for changes to the QMS, such changes will be planned, documented, and implemented. Connections’ management is responsible to implement the required activities of change management for any significant process change to the QMS. Examples of “significant” change would be major process/equipment changes, implementation, of new methods/processes, new standard for QMS, etc. Please see Change Control Matrix which includes the following requirements:

-Documentation of the initiated source (DDRS regulations or Internal)

-Reason and/or verification of need for change including development of the process

-Planning and documentation needed for implementation of change published

-Planning of any infrastructure resources and training disseminated with ongoing follow up plan

-Planning and documentation of any new monitoring and measurement requirements of the change

1. Support

7-1. Resources

Connections Case Management LLC will determine and provide the resources needed to implement, maintain. And continuously improve the quality management system. Connections will consider the capabilities of, and constraints on, existing internal resources as well as what need to be obtained from external parties.

Connections will determine and provide the persons necessary for the effective implementation of its QMS and/or the operation and control of its processes. All person performing work meet the 460 IAC requirements for hiring per Operations Manual with a job description for each position including:

-Minimum qualifications for the position;

-Major duties required of the position;

-Responsibilities of the employee, agent, or contractor in the position;

-The name and title of the supervisor to whom the employee in the position must report.

-Managing Owners will review the job descriptions at least annually and update as needed.

-A procedure for conducting reference, employment, and criminal background checks on each prospective owner, director, officer, employee, contractor, subcontractor, or other agent.

-A prohibition against employing or contracting with a person performing any management, administrative, or direct service to an individual on behalf of a provider company convicted of the offenses listed in the DDRS “Employment of Persons with Convictions of Prohibited Offenses and Non-Residency Status” policy.

-Employing or contracting with a person with certain criminal offenses.

-A process for evaluating the job performance of each owner, director, officer, employee, contractor, subcontractor, or other agent performing any management, administrative, or direct service to a client on behalf of Connections Case Management, LLC at the end of the training period and annually thereafter; including a process for feedback from receiving services from the owner, director, officer, employee, contractor, subcontractor, or agent.

-A description of the work-related behavioral criteria used by the provider to initiate substance abuse screenings with its owners, directors, officers, employees, contractors, subcontractors, or other agents.

Connections Case Management LLC will determine, provide, and maintain the infrastructure necessary for the operation of its processes. Connections does not have physical office space for case management activities, all case managers home office and/or are in the field in clients’ homes and provider establishments. Connections maintains files within the 460 IAC and DDRS policies state owned web- based systems. Connections ensures staff have access as needed to all systems in coordination with state liaison.

Connections will determine, provide and maintain the environment necessary for the operation of its processes and to achieve conformity of services. Connections maintains policies in Employee Manual and Operations Manual to communicate all environmental expectations including but not limited to: dress code, non-discriminatory, non-harassing, code of ethics and maintaining a professional environment. Connections is committed to ongoing evaluation, person by person, to address stress-reducing and burnout prevention as needed.

Connections Case Management LLC determined and provides the resources needed to ensure valid and reliable results when monitoring or measuring is used to verify conformity of services to requirements. The organization shall ensure that the resources provided are suitable for the specific type of monitoring and measurement activities being undertaken and are maintained to ensure their continuing fitness for their purpose. Measurement traceability is not a requirement as Connections Case Management does utilize or maintain any measuring equipment.

Connections Case Management LLC has determined the knowledge necessary for the operation of its processes and to achieve conformity of services. When addressing changing needs and trends, the organization shall consider its current knowledge and determine how to acquire or access any necessary additional knowledge and required updates. Connections ensures that all external sources and resources are available to all employees through access to every state web-based system, weekly updates, monthly newsletter, monthly 1:1 meetings with supervisor, ongoing quarterly training, 20 hours of required training annually through state system. See Issues Matrix and Change Control Matrix for measured needs and trends regarding all necessary knowledge and training.

7-2. Competence

Connections Case Management LLC will:

-determine the necessary competence for personnel performing work that affects the performance and effectiveness of the QMS

-ensure that these employees are competent based on appropriate education, training, and experience

-take actions to acquire the necessary competence and evaluate the effectiveness of the actions taken

-retain appropriate documented information as evidence of competence

7-3. Awareness

Connections Case Management LLC will ensure that persons doing work under Connections’ control are aware of:

-the quality policy

-relevant quality objectives

-their contribution to the effectiveness of the QMS, including benefits

-the implications of not conforming with QMS requirements

7-4. Communication

Connections Case Management LLC upper management shall determine the appropriate internal and external communications are established and are relevant to the QMS, including:

-party involved

-when to communicate

-with whom to communicate

-how to communicate

Please see Communication Matrix (sheet 4).

7-5. Documented Information

Connections Case Management LLC’s quality management system documentation includes all documented information required by the International Standard and determined as being necessary for the effectiveness of the QMS this includes the following:

-documented statements and quality policy and objectives per Operations Manual and Employee Manual

-documents, including records determined by Connections to be necessary to ensure the effective planning, operation and control of its processes

Connections Case Management LLC has established and currently maintains an Operations Manual and Employee Manual with quality policies and procedures. When creating and updating documented information, Connections shall ensure appropriate

-identification and description

-format

-review and approval for suitability and adequacy

Connections Case Management LLC documents required by the QMS are controlled and are available and suitable for use, where and when they are needed within the document library and are adequately protected and managed from loss of confidentiality, improper use, loss of integrity, etc. Hard files are kept in a locked filing cabinet and electronic files are maintained in password protected online One Drive.

For control of documented information, Connections shall address the following activities:

-distribution, access, retrieval and use

-storage and preservation, including preservation of legibility

-version control

-retention and disposition

Documented information of external origin determined by Connections to be necessary for the planning and operation of the QMS shall be identified as appropriate, is controlled, and retained as evidence of conformity shall be protected from unintended alterations. The following types of documents are considered controlled QMS documents and are maintained according to the requirements of the QMS:

-Connections Case Management LLC Operations Manual

-Connections Case Management LLC Employee Manual

-Connections Case Management LLC Forms

-Connections Case Management LLC Procedures and Work Instructions

Connections Case Management LLC Operations Manual 2.2 Maintenance of Personnel Records per 460 IAC and DDRS Policies. Please see Controlled Record Matrix for master list.

1. Operation

8-1. Operational Planning and Control

Connections Case Management LLC shall plan, implement, and control the processes needed to meet the requirements for the provision of services and to implement the actions determined by:

-determining the requirements for the services

-establishing criteria for the processes, the acceptance of services

-implementing control of the processes in accordance with the criteria

-determining, maintaining, and retaining documented information to the extent necessary to have confidence that the processes have been carried out as planned and to demonstrate the conformity of services to their requirements

Connections upper management is responsible for planning service provisions and maintaining control of planned changes and review of the consequences of unintended changes. Upper management shall ensure that outsourced processes are controlled where applicable.

8-2. Requirements for Services (Products does not apply)

Connections Case Management LLC communication with clients shall include all 460 IAC and DDRS policies regarding face to face contact, providing information concerning services, handling complaints and inquiries, obtaining feedback, establishing specific requirements for contingency actions, when relevant.

Connections Case Management LLC only offers one service, case management, per 460 IAC and shall meet all requirements per 460 IAC and DDRS Policies per state certification. Connections shall ensure that it can meet the requirements for services and conduct quality service survey of the services provided to each waiver recipient and shall retain all documented information quarterly. Case Record Reviews are completed by BDDS/BQIS and CAPs completed by Operations Team and monitored by QAD. Unsatisfactory results are completed by Operations Team.

See CRR Matrix

See Control Matrix

8-3. Design and Development of Services (Products does not apply)

Connections Case Management LLC shall follow all 460 IAC and DDRS policies per state certification for the service of case management as developed and determined by the State of Indiana and monitored by Connections’ QMS, Operations Manual and Employee Manual and policies.

Identify: Connections Case Management LLC does not design or develop Case Management Process Requirements; all requirements and processes are regulated and housed in State of IN DDRS BDDS Portal. Verify: Compliance with that standard is monitored via Monthly 1:1 Supervision form with a random file reviewed monthly per case manager. Validation: State of IN BDDS completes random case record reviews, see CRR matrix. Service delivery issues or corrective actions are addressed and enforced per Employee Manual Disciplinary Procedure.

See Employee Manual

See Operations Manual

8-4. Control of externally provided processes, products, and services

Connections Case Management LLC may not outsource services related to completing case management processes per 460 IAC and DDRS Policies. Connections does not purchase any products or services for clients served in accordance with State of Indiana Code of Ethics, Non-Solicitation Policy and Standard Code of Conduct policies and procedures.

External Suppliers of services and products will be reviewed as necessary and/or annually and recorded. Results presented at Management Review for deliberation and final approval. All external vendors will engage in a purchase agreement or an invoice approved by CEO.

See Approved Vendor Matrix

See Technology Tracking Matrix

8-5. Production and Service Provision

Connections Case Management shall implement service provision under controlled conditions per 460 IAC and DDRS Policies. Controlled conditions shall include:

-the availability of documented information that defines the characteristics of services to be provided and activities to be performed as well as the results achieved

-the availability and use of suitable monitoring and measuring resources

-the implementation of monitoring and measurement activities at each stage of service delivery

-the appointment of competent person, including any required qualifications per 460 IAC and DDRS

-the implementation of actions to prevent human error

-the implementation of release, delivery, and post-delivery activities

Connections Case Management LLC shall use the State of Indiana web-based systems for reporting and tracking and identifying outputs of service delivery. Connections shall control the unique identification of the outputs based on the reports generated from the state owned and controlled system.

Connections Case Management LLC does not possess, control or maintain customer’s property or external provider property at any time. Intellectual and personal data is controlled and protected in the State of Indiana web-based systems by the State of Indiana Bureau of Developmental Disability Services. Connections does not have any post-delivery activities. Connections will continue to follow changes to policy or law as determined and distributed by FSSA. Connections may not solicit customers/clients and completes onboarding of client file per state regulations.

* 1. Release of Products and Services

Connections Case Management LLC will provide a Customer Satisfaction Survey annually per State of Indiana Bureau of Developmental Disability Services, the survey will be anonymous and will review satisfaction measures per State of Indiana Community of Practice Policies.

See Quality Survey Matrix

8-7. Control of Nonconforming Outputs

Connections Case Management LLC ensures that services which do not conform to the requirements are identified and controlled to prevent its unintended use or delivery. Connections will take appropriate action based on the nature of the non-conformity and its effects in the services detected. Connections will deal with the nonconforming outputs in one or more of the following ways:

-correction

-containment

-informing the client/individual

1. Performance Evaluation

9-1. Monitoring, Measurement, Analysis, and Evaluation

Connections Case Management LLC will determine what needs to be monitored and measured; the methods for monitoring, measuring, analysis and evaluation needed to ensure valid results; when the measuring will be performed, and when the results from monitoring and measuring will be analyzed and evaluated. Connections will evaluate the performance and effectiveness of the QMS and retain the appropriate documentation information as evidence of the results.

Connections Case Management LLC supplies an annual satisfaction survey to individuals per state regulations. Connections shall monitor clients’ perceptions of the degree to which their needs and expectations have been fulfilled and determine the methods for obtaining, monitoring and reviewing this information. Connections will analyze and evaluate appropriate data and information arising from monitoring and measurement, the results shall be used to evaluate:

-conformity of services

-degree of customer satisfaction

-performance and effectiveness of QMS

-if planning has been implemented effectively

-the effectiveness of actions taken to address risks and opportunities

-performance of external providers

-the needs for improvements to the QMS

9-2. Internal Audit

Connections Case Management LLC shall conduct an internal audit annually to provide information on whether the QMS conforms to the Connections’ own requirements for the QMS and the International Standard and is effectively implemented and maintained.

Connections Case Management LLC plans, establishes, implements, and maintains an audit program including the frequency, methods, responsibilities, planning requirements and reporting, which takes in to considerations the importance of the processes concerned, changes affecting the organization and the results of previous audits by:

-defines the audit criteria

-selects auditors and conducts audits to ensure the objectivity and impartiality of the audit process

-ensures the results are reported to relevant management

-takes appropriate correction and corrective actions without undo delay

-retains documented information as evidence of the implementation of the audit program and the audit results

9-3. Management Review

Connections Case Management LLC will conduct at minimum an annual management review to ensure the continuing suitability, adequacy, effectiveness, and alignment with the strategic direction of the organization. The management review is planned and carried out taking into consideration:

-the status of actions from previous management reviews

-changes in external and internal issues that are relevant to the QMS

-information on the performance and effectiveness of the QMS including trends in customer satisfaction and feedback from relevant parties; the extent to which the quality objectives have been met; process performance and conformity of services; nonconformities and corrective actions; monitoring and measurement results; audit results

-the adequacy of resources

-review of external vendors

-the effectiveness of actions taken to address risks and opportunities, please see Risk Matrix

-opportunities for improvement

Documentation of management reviews are retained in meeting minutes. The outputs of the review include decision and actions related to opportunities for improvement, any need for changes to the QMS, and resource needs.

1. Improvement

10-1. General

Connections Case Management LLC will determine and select opportunities for improvement and implement necessary actions to meet client requirements and enhance client satisfaction. Connections will include:

-improving services to meet all State of Indiana requirements as well as to address future needs and expectations

-correcting, preventing, or reducing undesired effects

-improving the performance and effectiveness of the QMS

Connections will use means of one or more of the following, but not limited to corrective actions, continual improvement, breakthrough change, innovation, and re organization.

10-2. Nonconformity and Corrective Action

Connections Case Management LLC ensures that any service that does not comply of conform to the requirements is identified and controlled to prevent unintended use or results. When a nonconformity occurs, including and arising from complaints, Connections shall:

-react to the nonconformity and as applicable, act to control it and deal with the consequences

-evaluate the need for action to eliminate the cause or causes of the nonconformity in that it does not occur elsewhere by reviewing and analyzing the nonconformity, determining the cause of the nonconformity, and determining if similar nonconformities exist or could potentially occur

-implement any action needed

-review the effectiveness of any corrective action plan

-update risks and opportunities determined during planning

-make changes to the QMS

Connections Case Management LLC will take action to eliminate the cause of the nonconformities to prevent any reoccurrence. Any nonconforming services will have corrective action documented including the nature of the nonconformity and any subsequent actions taken and the results of any corrective action.

10-3. Continual Improvement

Connections Case Management LLC will continually improve the suitability, adequacy, and the effectiveness of the QMS. Connections will use the results of the analysis and evaluation and the outputs from the management review to determine if there are needs or opportunities that will be addressed as part of the continual improvement. Please see Continual Improvement Matrix.