

Meeting Minutes

Certified Professional Guardianship Board

Monday, April 23, 2018
SeaTac Office Center – So. Tower
18000 International Blvd, Ste 1106
SeaTac, WA 98188
9:00 a.m. – 3:00 p.m.

DRAFT Meeting Minutes

Members Present

Judge James Lawler, Chair
Commissioner Rachelle Anderson
Ms. Rosslyn Bethmann
Ms. Annette Cook
Mr. Jerald Fireman
Judge Gayle Harthcock
Mr. William Jaback
Ms. Victoria Kesala
Commissioner Diana Kiesel
Dr. K. Penney Sanders
Ms. Barbara West

Members Absent

Commissioner Diana Kiesel
Ms. Amanda Witthauer

Staff

Ms. Stacey Johnson
Ms. Kathy Bowman
Ms. Carla Montejo
Ms. Kim Rood
Ms. Eileen Schock

Extern: Ms. Maia Crawford-Bernick

Guests: See last page.

1. Meeting Called to Order

Judge James Lawler welcomed all present and called the Certified Professional Guardianship Board's Annual Planning Meeting to order at 9:05 a.m.

Public Comment Period

Members of the public were invited to participate in a moderated discussion with Board members.

Ms. Claudia Donnelly spoke as an advocate for changing guardianship laws with respect to protecting elders from abuse. Ms. Donnelly cited the passing of 2SHB 1402 (2017), prohibiting the restriction of an incapacitated person's or other vulnerable adult's right to communicate, visit, interact, or otherwise associate with persons of the incapacitated person's or vulnerable adult's choosing, and also asked the Board how CPGs, lawyers and AOC staff are notified of new laws that affect guardianships. Commissioner Anderson answered that the Superior Court Judges Association follows the legislature over the year, and judicial conferences are held during spring and fall. Staff noted that AOC has a legislative staff person who disseminates new laws and assures the appropriate departments are informed of changes. Also mandated by 2SHB 1402 (2017), further educational outreach is currently in process with a newly hired education coordinator who will develop and offer training targeted to the legal community and persons working in long-term care facilities.

Ms. Donnelly asked if there was any other guardianship legislation in the works. Judge Lawler responded that it is not within the Board's function to propose legislative change. However, the

Board reviews proposed legislation and may make comment. The Board's role is to look at legislative proposals for how they could affect those subject to guardianship.

Ms. Donnelly's final question was whether the Working Interdisciplinary Network of Guardianship Stakeholders (WINGS) group would continue its work. Staff replied that the WINGS grant has been expended and at this time the Board and AOC will not be continuing facilitation of this stakeholder group. We will participate if a stakeholder wants to facilitate and fund activities.

Grievances

Staff presented the annual Grievance Report, a summary of grievances that were received and closed in 2017. A majority of the grievances received in 2017 were closed for no jurisdiction, involving a Lay Guardian or an out-of-state guardianship, or the Standards of Practice Committee found there was no actionable conduct on the part of the CPG. Staffing is back to two full-time grievance investigators who are moving forward with reducing the number of pending cases.

It was noted by staff that the majority of incoming grievances are concerned with communication and/or financial issues. Methods for reducing the backlog of pending cases have been identified, including mediation and conducting financial reviews. A dialog was opened between the Board and Gary Beagle, President of Washington Association of Professional Guardians (WAPG) about these methods. Staff verified that confidentiality and destruction of document agreements were in place and agreed to draft a Memorandum of Understanding for any outside experts conducting financial reviews. Mr. Beagle provided a written letter and materials for the Board outlining issues recognized by WAPG and recommendations made by the association. Mr. Beagle commented that WAPG is interested in pursuing a mentorship program, and he would like to partner with the Guardianship Institute in exploring funding for that.

A Board member asked what the Board's action plan should be moving forward with the grievance process pertaining to financial audits. Judge Lawler advised it would be best to go first to the SOP Committee for their recommendations for next steps.

Mr. Beagle will send an email blast the 2017 CPGB Grievance Report to WAPG members. WAPG will also refine the list of suggestions, as some issues have been resolved during today's discussion. Mr. Beagle suggested WAPG assist with working through the grievance backlog. Judge Lawler believes there is too much potential for conflict for WAPG to do this work, and Mr. Beagle agreed.

Mindy Blanchard also addressed the Board and invited all members to attend a Guardian Institute conference.

Stacey Johnson, Manager of the Office of Guardianship and Elder Services, Penney Sanders, and Bill Jaback will make a presentation at the upcoming WAPG training.

2. Chair's Report

Approval of Minutes

A motion was made and seconded to approve the March 12, 2018 meeting minutes as written. All were in favor, and the motion passed.

Motion: *A motion was made and seconded to approve the March 12, 2018 minutes. The motion passed.*

Scheduling Conflict May 14, 2018

The perceived scheduling conflict between the CPG Board meeting and the WAPG training on May 14 was raised. Because the next CPG Board meeting will be by Teleconference, those members attending the WAPG training will join the meeting by calling in at 8:00 a.m.

An anticipated DSHS announcement regarding both an increase and a cap to CPG fees was briefly discussed.

3. Break for Working Lunch

4. Executive Session (Closed to Public)

5. Reconvene and Vote on Executive Session Discussion (Open to Public)

On behalf of the Applications committee, Barbara West presented the following applications for Certified Professional Guardian Certification. Members of the Applications Committee abstained.

Motion: *A motion was made and seconded to conditionally approve Dianna Evans' application for certification upon completion of the UW Certification Program. Ms. Rosslyn Bethmann opposed. Dr. K. Penney Sanders abstained. The motion passed.*

Motion: *A motion was made and seconded to conditionally approve Dana Hicks' application for certification upon completion of the UW Certification Program. The motion passed.*

Motion: *A motion was made and seconded to approve Gay Lynn James' application for certification. The motion passed.*

Staff presented the following individual for Administrative Decertification. Members of the Standards of Practice Committee abstained.

Motion: *A motion was made and seconded to Administratively Decertify Kelly Hope for failure to comply with annual recertification and Errors and Omissions insurance requirements. Mr. Bill Jaback abstained. The motion passed.*

6. Wrap Up and Adjourn

Judge Lawler made a suggestion that when sending correspondence requiring registered Certified Mail signature receipt, a second copy of the correspondence be posted via standard US Mail.

The next CPG Board meeting will be held via Teleconference on May 14, 2018 at 8:00 am. The meeting adjourned at 1:30 pm.

DRAFT

Recap of Motions from April 23, 2018 Meeting

Motion Summary	Status
Motion: <i>A motion was made and seconded to approve the March 12, 2018 minutes. The motion passed.</i>	Passed
Motion: <i>A motion was made and seconded to conditionally approve Dianna Evans' application for certification upon completion of the UW Certification Program. Ms. Rosslyn Bethmann opposed. Dr. K. Penney Sanders abstained. The motion passed.</i>	Passed
Motion: <i>A motion was made and seconded to conditionally approve Dana Hicks' application for certification upon completion of the UW Certification Program. The motion passed.</i>	Passed
Motion: <i>A motion was made and seconded to approve Gay Lynn James' application for certification. The motion passed.</i>	Passed
Motion: <i>A motion was made and seconded to Administratively Decertify Kelly Hope for failure to comply with annual recertification and Errors and Omissions insurance requirements. Mr. Bill Jaback abstained. The motion passed.</i>	Passed

Guests

Gary Beagle
Mindy Blanchard
Claudia Donnelly
Karen Newland

DSHS Updated Information Regarding Certified Professional Guardian Payments



RULE-MAKING ORDER PERMANENT RULE ONLY

CR-103P (December 2017) (Implements RCW 34.05.360)

CODE REVISER USE ONLY

OFFICE OF THE CODE REVISER
STATE OF WASHINGTON
FILED

DATE: April 24, 2018

TIME: 9:52 AM

WSR 18-10-024

Agency: Health Care Authority

Effective date of rule:

Permanent Rules

- 31 days after filing.
- Other (specify) June 1, 2018 (If less than 31 days after filing, a specific finding under RCW 34.05.380(3) is required and should be stated below)

Any other findings required by other provisions of law as precondition to adoption or effectiveness of rule?

- Yes No If Yes, explain:

Purpose: The agency is amending and repealing WACs to create a process that allows a Medicaid client to keep more of their income that would have otherwise been paid towards the client's cost care, in order to compensate and reimburse their guardian. The purpose of new section WAC 182-513-1530 is to combine the former WAC sections and modify the existing process into one WAC section.

Citation of rules affected by this order:

New: 182-513-1530
 Repealed: 182-513-1505, 182-513-1510, 182-513-1520
 Amended: 182-513-1515, 182-513-1525
 Suspended:

Statutory authority for adoption: RCW 41.05.021, 41.05.160

Other authority:

PERMANENT RULE (Including Expedited Rule Making)

Adopted under notice filed as WSR 18-04-056 on February 1, 2018 (date).
 Describe any changes other than editing from proposed to adopted version:

Proposed/Adopted	WAC Subsection	Reason
Original WAC # 182-513-1530 Maximum guardianship fee and related cost deductions allowed from a client's participation or room and board on or after June 1, 2018		
Proposed	(2)(b)(i)The total deduction for costs directly related to establishing a guardianship for a client cannot exceed \$1,400.	The agency increased the maximum deduction allowed to establish a guardianship based on stakeholder comments.
Adopted	(2)(b)(i)The total deduction for costs directly related to establishing a guardianship for a client cannot exceed \$1,400 <u>\$1,850</u> .	
Proposed	(2)(b)(iii) The amount of the monthly deduction for guardianship fees cannot exceed \$225 per month.	The agency increased the maximum monthly deduction for guardianship fees based on stakeholder comments.
Adopted	(2)(b)(iii) The amount of the monthly deduction for guardianship fees cannot exceed \$225 <u>\$235</u> per month.	

If a preliminary cost-benefit analysis was prepared under RCW 34.05.328, a final cost-benefit analysis is available by contacting:

Name:
Address:
Phone:
Fax:
TTY:
Email:
Web site:
Other:

**Note: If any category is left blank, it will be calculated as zero.
No descriptive text.**

**Count by whole WAC sections only, from the WAC number through the history note.
A section may be counted in more than one category.**

The number of sections adopted in order to comply with:

Federal statute:	New	___	Amended	___	Repealed	___
Federal rules or standards:	New	___	Amended	___	Repealed	___
Recently enacted state statutes:	New	___	Amended	___	Repealed	___

The number of sections adopted at the request of a nongovernmental entity:

New	___	Amended	___	Repealed	___
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The number of sections adopted on the agency's own initiative:

New	___	Amended	___	Repealed	___
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The number of sections adopted in order to clarify, streamline, or reform agency procedures:

New	<u>1</u>	Amended	<u>2</u>	Repealed	<u>3</u>
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The number of sections adopted using:

Negotiated rule making:	New	___	Amended	___	Repealed	___
Pilot rule making:	New	___	Amended	___	Repealed	___
Other alternative rule making:	New	<u>1</u>	Amended	<u>2</u>	Repealed	<u>3</u>

Date Adopted: April 24, 2018

Name: Wendy Barcus

Title: HCA Rules Coordinator

Signature:



AMENDATORY SECTION (Amending WSR 16-15-042, filed 7/14/16, effective 7/14/16)

WAC 182-513-1515 Maximum guardianship fees and related costs before June 1, 2018. ~~((The superior court may allow guardianship fees and administrative costs in an amount set out in an order.))~~ (1) This section sets the maximum guardianship fees and related costs when:

(a) The court order was entered before June 1, 2018; and

(b) The client under guardianship was receiving medicaid-funded long-term care before June 1, 2018.

(2) For court orders entered ((after June 15, 1998)) before June 1, 2018, where the order establishes or continues a legal guardianship for a ((department client, and requires a future review or accounting; then unless otherwise modified by the process described in WAC 388-79-040:

((1) The amount of)) client:

(a) Guardianship fees ((shall)) must not exceed ((one hundred seventy five dollars)) \$175 per month;

((2) The amount of administrative)) (b) Costs directly related to establishing a guardianship for a ((department)) client ((shall)) must not exceed ((seven hundred dollars)) \$700; and

((3) The amount of administrative costs shall)) (c) Costs to maintain the guardianship must not exceed ((a total of six hundred dollars)) \$600 during any three-year period.

AMENDATORY SECTION (Amending WSR 16-15-042, filed 7/14/16, effective 7/14/16)

WAC 182-513-1525 Procedure for allowing guardianship fees and related costs from client participation ((after September 1, 2003)) before June 1, 2018. (1) ~~((After September 1, 2003, where a client is subject to a guardianship the department shall be entitled to notice of proceedings as described in RCW 11.92.150.~~

~~(2) The notice must be served to the department's regional administrator of the program that is providing services to the client. A list of the regional administrators will be furnished upon request.~~

~~(3) If the fees and costs requested and established by the order are equal to or less than the maximum amounts allowed under WAC 388-79-030, then the department will)) This section describes the procedure for allowing guardianship fees and related costs from client participation when:~~

~~(a) A court order was entered before June 1, 2018; and~~

~~(b) The client under guardianship was receiving medicaid-funded long-term care before June 1, 2018.~~

~~(2) The medicaid agency or the agency's designee, after receiving the court order, adjusts the client's current participation to reflect the amounts, as allowed ((upon receipt by the department of the court order setting the monthly amounts.~~

~~(4) Should fees and costs in excess of the amounts allowed in WAC 388-79-030 be requested:~~

~~(a) At least ten days before filing the request with the court, the guardian must present the request in writing to the appropriate~~

regional administrator to allow the department an opportunity to consider whether the request should be granted on an exceptional basis.

(b) In considering a request for extraordinary fees or costs, the department must consider the following factors:

(i) The department's obligation under federal and state law to ensure that federal medicaid funding is not jeopardized by noncompliance with federal regulations limiting deductions from the client's participation amount;

(ii) The usual and customary guardianship services for which the maximum fees and costs under WAC 388-79-030 must be deemed adequate for a medicaid client, including but not limited to:

(A) Acting as a representative payee;

(B) Managing the client's financial affairs;

(C) Preserving and/or disposing of property;

(D) Making health care decisions;

(E) Visiting and/or maintaining contact with the client;

(F) Accessing public assistance programs on behalf of the client;

(G) Communicating with the client's service providers; and

(H) Preparing any reports or accountings required by the court.

(iii) Extraordinary services provided by the guardian, such as:

(A) Unusually complicated property transactions;

(B) Substantial interactions with adult protective services or criminal justice agencies;

(C) Extensive medical services setup needs and/or emergency hospitalizations; and

(D) Litigation other than litigating an award of guardianship fees or costs.

(c) Should the court determine after consideration of the facts and law that fees and costs in excess of the amounts allowed in WAC 388-79-030 are just and reasonable and should be allowed, then the department will adjust the client's current participation to reflect the amounts allowed upon receipt by the department of the court order setting the monthly amounts.

(5) In no event may a client's)) under WAC 182-513-1380, 183-515-1509, or 183-515-1514.

(3) A client's participation cannot be prospectively or retroactively reduced to pay guardianship fees and related costs incurred:

(a) Before ((the effective date of)) the client's long-term care medicaid eligibility effective date; ((or))

(b) During any ((subsequent)) time ((period)) when the client was not eligible for((7)) or did not receive long-term care services; or

(c) After the client has died. ((There is no client participation towards DDD certified and contracted supported living services under chapter 388-820 WAC, so the department has no responsibility to reimburse the client for guardianship fees when those fees result in the client having insufficient income to pay their living expenses.

~~(6) If))~~

(4) The fees and costs allowed by the court at the final accounting must not exceed the amounts advanced and paid to the guardian from the client's participation if:

(a) The court, at a prior accounting, ((has)) allowed the guardian to receive guardianship fees and related costs from the client's ((monthly income)) participation in advance of services rendered by the guardian((7)); and

(b) The client dies before the next accounting((7, the fees and costs allowed by the court at the final accounting may be less than,

~~but may not exceed, the amounts advanced and paid to the guardian from the client's income.~~

~~(7) Guardians must furnish the regional administrator with complete packets to include all documents filed with the court and with formal notice clearly identifying the amount requested)).~~

NEW SECTION

WAC 182-513-1530 Maximum guardianship fee and related cost deductions allowed from a client's participation or room and board on or after June 1, 2018. (1) General information.

(a) This section sets the maximum guardianship fee and related cost deductions when:

(i) A court order was entered on or after June 1, 2018; or

(ii) The client under guardianship began receiving medicaid-funded long-term services and supports on or after June 1, 2018.

(b) This section only applies to a client who is:

(i) Eligible for and receives institutional services under chapter 182-513 WAC or home and community-based waiver services under chapter 182-515 WAC, and who is required to pay participation under WAC 182-513-1380, 182-515-1509, or 182-515-1514; or

(ii) Eligible for long-term services and supports under chapter 182-513 or 182-515 WAC, and who is required to pay only room and board.

(c) All requirements of this section remain in full force whether or not the agency appears at a guardianship proceeding.

(d) In this section, the agency does not delegate any authority in determining eligibility or post-eligibility for medicaid clients.

(i) Under the authority granted by RCW 11.92.180, the agency does not deduct more than the amounts allowed by this section from participation or room and board.

(ii) The eligibility rules under Title 182 WAC remain in full force and effect.

(e) The agency does not reduce a client's participation or room and board under this section for guardianship fees or related costs accumulated during any month that a client was not required to pay:

(i) Participation under WAC 182-513-1380, 182-515-1509, or 182-515-1514; or

(ii) Room and board under chapter 182-513 or 182-515 WAC.

(f) If the client has another fiduciary, payee, or other principal-agency relationship and the agent is allowed compensation, any monthly guardianship fee approved under this section is reduced by the agent's compensation.

(2) Maximum guardianship fee and related cost deductions.

(a) The maximum guardianship fee and related cost deductions under this section include all guardianship services provided to the client, regardless of the number of guardians appointed to a client during a period of time, or whether the client has multiple guardians appointed at the same time.

(b) Maximum guardianship fees and related cost deductions are as follows:

(i) The total deduction for costs directly related to establishing a guardianship for a client cannot exceed \$1,850;

(ii) The total deduction for guardianship-related costs cannot exceed \$1,200 during any three-year period; and

(iii) The amount of the monthly deduction for guardianship fees cannot exceed \$235 per month.

(3) For people under subsection (1)(b)(i) of this section - Participation deductions.

(a) After receiving the court order, the agency or its designee adjusts the client's current participation to reflect the deductions under WAC 182-513-1380, 182-515-1509, or 182-515-1514.

(b) The amounts of the participation deductions are the amounts under subsection (2) of this section, or the court order, whichever are less.

(c) For clients who pay room and board in addition to participation, if the client's amount of participation is insufficient to allow for the amounts under subsection (2) of this section, then, regardless of any provision of chapter 182-513 or 182-515 WAC, the client's room and board will be adjusted to allow the amounts under subsection (2) of this section.

(4) For people under subsection (1)(b)(ii) of this section - Room and board deductions.

(a) The agency adjusts the client's room and board after receiving the court order, regardless of any provision of chapter 182-513 or 182-515 WAC.

(b) The amounts of the room and board deductions are the amounts under subsection (2) of this section, or the court order, whichever are less.

REPEALER

The following sections of the Washington Administrative Code are repealed:

WAC 182-513-1505	Purpose.
WAC 182-513-1510	Definitions.
WAC 182-513-1520	Procedure to revise award letter after June 15, 1998, but before September 1, 2003.

Memo Re: Utilizing Community Partners to Assist with Financial Audits

Certified Professional Guardianship Board

ADMINISTRATIVE OFFICE OF THE COURTS

Callie T. Dietz
State Court Administrator

May 7, 2018

Memorandum for Certified Professional Guardian Board

From: Stacey Johnson, Manager

Subject: Utilizing Community Partners to Assist with Financial Audits

Concern

At the 2018 Annual Planning meeting, Mr. Gary Beagle expressed concern regarding the utilization of students to conduct financial audits. Mr. Beagle was particularly concerned with adherence to confidentiality and the qualifications of the students to perform such tasks. One board member also expressed concern regarding oversight of the students and the scope of work involved in the partnership with WSU.

Background

In an effort to expedite the review of financial audits, the Office of Guardianship and Elder Services (OGES) partnered with WSU's Carson School of Business for auditing assistance. The following process was outlined by OGES and WSU:

Diversion Financial Audit Process

- A. **Educational Institute expresses an interest in participating**
 1. Share the following documents with the Responsible Instructor for his or her review
 - a. Audit Partnership Agreement
 - b. Diversion Instruction Letter
 - c. Diversion Volunteer Application
 - d. Diversion Volunteer Agreement
 - e. Diversion Background Check Letter
 - f. Diversion Fingerprint Card Instruction
 - g. Diversion Confidentiality Agreement
 - h. Diversion Document Destruction Agreement

B. Educational Institution Agrees to Participate

1. AOC creates a partnership agreement for the institution and creates an electronic file
2. The Responsible Instructor sends the Audit Partnership Agreement to Students
3. Student contacts AOC
4. AOC sends interested student the Diversion Instruction Letter, the Volunteer Application, the Volunteer Agreement, the Confidentiality Agreement and the Document Destruction Agreement
5. Student sends completed Volunteer Application to AOC
6. AOC reviews application approves and mails fingerprint card and letter
7. Students get fingerprinted
8. AOC receives a clean background check
9. AOC e-mails guardianship accounting documents and instructions via WA secure e-mail

Professor Kathleen Harris requested that OGES provide 12 cases for her graduate class to review. Professor would provide oversight of her students work and would personally audit Mr. Beagle's materials due to the complexity of this case. There is not an MOU or contract on file. However, OGES is able to produce evidence of the students' and Professor's completed volunteer application materials.

Currently Investigators, Eileen Schock and Carla Montejo, are reviewing the work of the students. The students have completed the audits provided to them, but Professor Harris is currently waiting on documentation to complete Mr. Beagle's audit.

Impact

The AOC, Board, and CPGs are burdened with a backlog of grievances. Utilizing partners that specialize in accounting, such as accredited institutions, increase the efficiency of reviewing grievances that require financial audits. Without assistance reviewing the audits the backlog of grievances will likely continue to increase. Collaboration with education institutions offer appropriate expertise and oversight without the added additional cost to the AOC, guardians under review, and Board. It is mutually beneficial for the students assigned to the review to gain practical skills and experience with the oversight of their competent and experienced instructors.

Current need

The Supreme Court delegated primary responsibility to the Board to investigate professional guardians when a complaint is filed and sanction professional guardians when appropriate. There is currently a backlog of grievances going back to 2014. Since the implementation of the RCW 11.88.120, establishing a guardianship complaint procedure for the superior courts, the number of grievances have increased significantly. There was a 60% increase from 2015 to 2016. In 2017, 70 new grievances were opened. There were 34 grievances resolved in 2017 and it is of note that 28 of those were closed due to no jurisdiction. The most common grievance filed is in regards to financial matters. This is

also one of the most time consuming to investigate due to the financial audits. There are currently two investigators working to resolve 150 open grievances. Without the Board exercising their authority to utilize all available and appropriate tools, the grievance count is likely to continue to rise, and guardians will continue to be frustrated by lengthy waits for resolutions.

Alternatives Explored

Alternatives to collaborating with educational institutions include; hiring a financial consultant at the cost of the guardian, seeking approval and provisions from the Supreme Court to hire additional Investigators, continue to allow the current Investigators to work through the grievances to the best of their capacity.

There is currently enough work and enough grievances to support at least one more Investigator and utilize the financial expertise of the local business schools. However, there are cost barriers to hiring additional staff.

The AOC and CPG Board have deemed it unacceptable not to intervene to address the backlog of grievances.

It is assumed that CPGs would reject the imposition of assigning fees associated to their required financial audits. However, this is an option that the Board may wish to offer in lieu of utilizing the free services offered through the educational institutions.

Recommendations

It is the recommendation of the Office of Guardianship and Elder Services that the CPG Board continue to utilize partnerships with agencies and institutions that have been accredited as experts in their field by reliable sources. An example of a reliable source is a credentialing or licensing organization. The provision of this collaboration will increase efficiency and decrease cost of services to the AOC, CPG Board, and Certified Guardians. The AOC will be responsible to ensure that the volunteers are appropriately screened based on the criteria outlined under background. AOC will also implement MOUs with the partner agency to solidify the agreement and scope of work.

Grievance Status Update

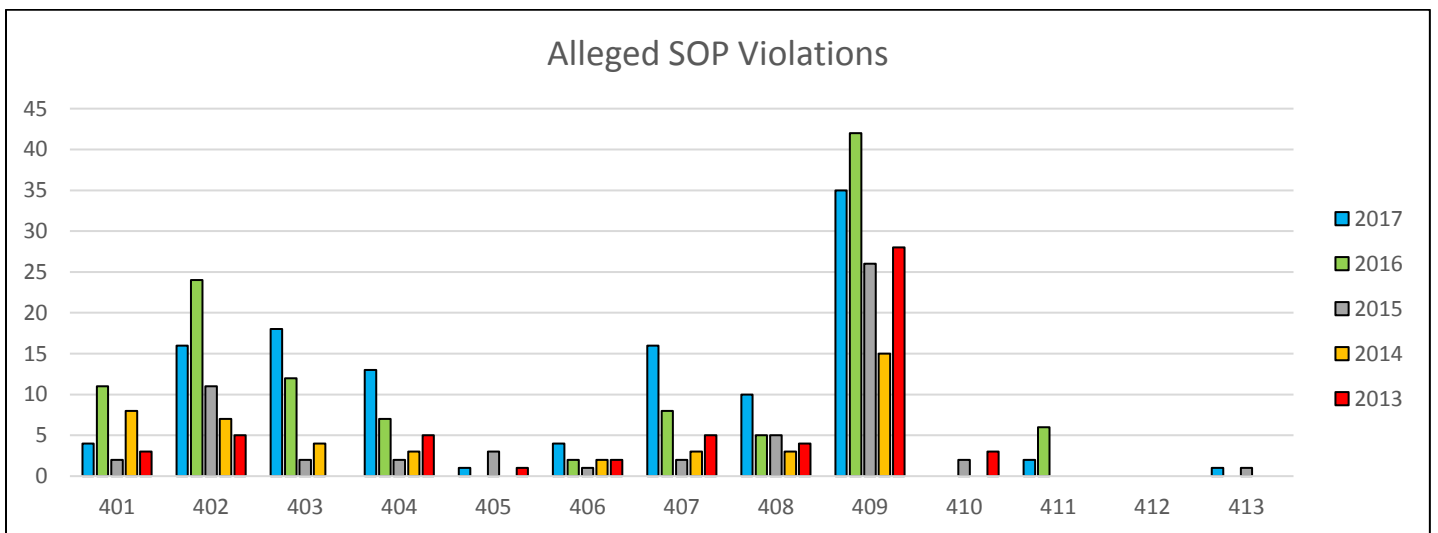
Certified Professional Guardians Grievance Status

April 30, 2018

Grievance Status by Year Received	2018	2017	2016	2015	2014	2013	2012	Total
Open Grievances as of March 30, 2018	17	62	40	15	7	2		143
New Grievances:	7							7
Voluntary Surrender Pending:		3	1		1			5
ARD Pending:		1	3					3
Complaint/Hearing Pending:				2		1	1	4
Grievances Resolved [this reporting period]:	[2]			[1]				[3]
Open Grievances April 30, 2018	22	62	40	14	7	2		147

Grievance Resolutions:	2018	2017	2016	2015	2014	2013	2012	Total
Dismissal – No Jurisdiction	2							2
Dismissal – No Actionable Conduct								
Dismissal – Insufficient Grievance								
Dismissal – Administrative								
Terminated – CPG Death								
Voluntary Surrender								
ARD – No Sanction								
ARD - Admonishment				1				1
ARD - Reprimand								
ARD - Suspension								
Administrative Decertification								
Decertification								
Total Resolved Grievances April 30, 2018	2			1				3

Grievance Resolutions 2013-2018	2018	2017	2016	2015	2014	2013	Total
Dismissal – No Jurisdiction	9	28	20	13	17	13	100
Dismissal – No Actionable Conduct		6	23	16	16	22	83
Dismissal – Insufficient Grievance			1				1
Dismissal – Administrative					2	1	3
Terminated – CPG Death				2			2
Voluntary Surrender		3	12	2	10	10	37
ARD – No Sanction						1	1
ARD - Admonishment				1			1
ARD - Reprimand			1	2		1	4
ARD - Suspension							
Administrative Decertification		1	2	13	11	3	30
Decertification						3	3
Total Resolved Grievances 2013 - 2018:	9	38	59	49	56	54	265



400 Standards of Practice Regulations

- 401 Guardian’s Duty to Court
- 402 Guardian’s Relationship to Family and Friends of Incapacitated Person and to Other Professionals
- 403 Self-Determination of Incapacitated Person
- 404 Contact with the Incapacitated Person
- 405 General Decision Standards
- 406 Conflicts of Interest
- 407 Residential Decisions
- 408 Medical Decisions
- 409 Financial Management
- 410 Guardian Fees and Expenses
- 411 Changes of Circumstances/Limitation/Termination
- 412 Sale or Purchase of Guardianship Practice
- 413 Responsibilities of Certified Public Guardian Agencies