Beltrami County Health and Human Services Response to DHS Waiver Review June 2014



To: DHS Waiver Review

Continuing Care Administration

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From: Dan Brouse, Social Services Program Manager

Date: June 10, 2014

Re: 2014 Beltrami County Waiver Review

Beltrami County Health and Human Services would like to thank the Department of Human Services for the opportunity to respond to the recommendations and corrective actions outlined in the Waiver Review Report. The review acknowledged areas of our strength and highlighted areas where further improvements are needed. Below are our updated implementation plans for improving services highlighted under recommendations and corrective actions. We will work on achieving these goals and will continue to monitor our progress.

Corrective Action:

Develop and implement a caseload management plan that will assure operational compliance of all waiver programs, while still allowing staff to maintain relationships with participants.

Plan:

- •Beltrami County Health and Human Services is in the process of streamlining the use of electronic forms to allow case managers to be more efficient in their work;
- •A tickler management system will be employed providing notification to case managers;
- •An additional Social Services manager will be employed to provide additional oversight of programs and HCBS requirements;
- •Two Adult Services intake social workers will provide organized case file and case assignment with program manager approval;
- •Annual assessment packets organized and maintained by case aides;
- •Case managers will use a case file checklist to ensure all files are compliant with program requirements. Case file check lists will be monitored by Adult Services Program Manager;
- •The Adult Services lead worker will have a reduced case load to allow for internal case file audits and case consultations;
- •Case aides and lead worker will maintain current DHS forms related to HCBS waiver requirements;
- •HCBS Quality Assurance committee will convene quarterly;
- •Case managers will be expected to access assessment packets and distribute to HCBS participant or legal representative at time of assessment and obtain required signatures;
- •Internal audit will be conducted by Adult Services lead worker and Adult Services program manager.

Corrective Action:

Beginning immediately, ensure that all participants have a signed and dated individual care plan that is current within the past year included in their case file.

Plan:

- •Each case manager must ensure that all care plans are current, signed and dated by the case manager and participant or their legal representative;
- •A tickler management system will provide notification to assigned case manager when care plans are due;
- •Documentation through SSIS that efforts to obtain guardian signatures occurred;
- Case file checklists will be employed for each HCBS waiver recipient;
- •Internal audit will be conducted by Adult Services lead worker and Adult Services program manager.

Corrective Action:

Beginning immediately, ensure that each participant case file includes signed documentation that participant's acknowledge a choice in care planning and services.

Plan:

- •Case managers will provide HCBS participants with a DHS form 2727 at time of initial application and annually thereafter;
- •Choice questions in care plans will be reviewed with HCBS participants on an annual basis;
- •Internal audit will be conducted by Adult Services lead worker and Adult Services program manager.

Corrective Action:

Beginning immediately, ensure that each participant case file includes signed documentation that participants have given informed consent to release private information.

Plan:

- •Each HCBS waiver participant case file will include signed documentation that participants or legal representative have given informed consent to release private info;
- •Case file checklists will be employed for each HCBS waiver participant;
- •Internal case file checklists will be monitored and reviewed by Adult Services lead worker and Adult Services program manager;
- •Internal audit will be conducted by Adult Services lead worker and Adult Services program manager.

Corrective Action:

Beginning immediately, ensure that each participant case file includes signed documentation that participants have been informed of their right to appeal on an annual basis. It is required that all HCBS participants have completed documentation of their right to appeal included in the case file.

Plan:

- •Case managers will assure that all HCBS participant case files include signed documentation that participants have been informed of their right to appeal on an annual basis;
- •DHS form 1941 'Your Appeal Rights' and DHS form 2727 will be provided to HCBS waiver participant and signatures obtained on an annual basis;
- •Case file checklists will be reviewed and monitored by assigned case manager, lead worker and social service program manager;
- •Internal audit will be conducted by Adult Services lead worker and Adult Services program manager.

Corrective Action:

Beginning immediately, include a back-up plan in the care plan of all CCB and DD program participants.

Plan:

- •An emergency back-up plan will be included for all CCB and DD program participants and updated annually;
- •Case file checklists will be employed;
- •The back-up plan will include three elements:
 - 1) The participant's preferred consulting hospital;
 - 2) Emergency contact in event that primary caregiver cannot be reached during an emergency; and
 - 3) Back-up staffing plans in event that primary staff are unable to provide needed services;
- •Internal audit will be conducted by Adult Services lead worker and Adult Services program manager.

Corrective Action:

Beginning immediately, case managers must conduct face-to-face visits with participants as required in the federally approved DHS waiver plans.

Plan:

- •All waiver participants must have a documented face-to-face visit by the case manager at least two times per year;
- Case managers will monitor visit dates and schedule visits 30 days prior to required date to accommodate any rescheduling needs;
- •Participants of DD waiver must be visited at least once every 6 months, CCB participants two times a year;
- •Case managers will document face-to-face contact using SSIS and case file checklists. Beltrami County Health and Human Services will explore accessing contracted case management for recipients residing in metro areas.
- •Internal audit will be conducted by Adult Services lead worker and Adult Services program manager;

Corrective Action:

Beginning immediately, ensure that all DD cases have a full-team screening document completed within the required time frames that includes the three required signatures and dates.

Plan:

- •All participants of DD waiver services will have a full team screening document fully completed with the required time frames that includes the three required signatures:
- •A DD waiver case file checklist will be employed;
- •A tickler management system will provide notification to assigned case manager when screenings are due;
- •Internal audit will be conducted by Adult Services lead worker and Adult Services program manager.

Corrective Action:

Beginning immediately, complete the ICF/DD Level of Care forms for all participants in the DD program.

Plan:

- •Each DD case manager will maintain the ICF/DD level of care forms (DHS 4147A) in the HCBS participant file and update it annually;
- •DHS 4147A forms will be included in DD waiver annual review packet and DD case file checklist;
- •Internal audit will be conducted by Adult Services lead worker and Adult Services program manager.

Corrective Action:

Beginning immediately, ensure that case files include the annual BI Assessment and Eligibility Determination form for all BI participants.

Plan:

- •Each HCBC BI participant case file will include annual BI assessment and eligibility determination form (DHS 3471);
- •Required signatures will be obtained annually;
- •The BI form (DHS 3471) will be included in the CCB case file checklist;
- •Internal audit will be conducted by Adult Services lead worker and Adult Services program manager.