

Dakota County' Action Plan to Waiver Review (Dec 2014) Corrective Action Items:

- 1. Ensure that each participant case file includes signed documentation that participants have been informed of their right to appeal on an annual basis:**
 1. Dakota County Community Living Services plans:
 - 1.1 Prior to April 1, 2015 staff provided "Right to Appeal" information at the annual Reassessments. Receipt of appeal information was documented on the DHS 'Application for Title XIX Home and Community based Waiver services/AC' or on a lead agency signature page.
 - 1.2 After April 1, 2015, staff will provide appeal information at the time of assessment/reassessment and document the receipt of right to appeal information in both the DHS 'Application for Title XIX HCBS Waiver/AC' Form and on the DHS form CSP/CSSP.
 - 1.3 Dakota County Social Services monthly audit tool will include compliance review relative to reviewing and documenting receipt of appeal rights at assessment.

- 2. Ensure that each participant case file includes signed documentation that participants have been informed of the lead agency's privacy practices in accordance with HIPAA and MN Statutes on an annual basis:**
 2. Community Living Services plans:
 - 2.1 Prior to April 1, 2015 staff provided HIPAA & data privacy practices information at the annual Reassessments. Receipt of HIPAA and data privacy practices information was documented on a lead agency signature page. After April 1, the DHS CSP/CSSP will be used to document receipt of HIPAA and data privacy practices information.
 - a. Staff will provide HIPAA and data privacy practices information; and
 - b. Staff will document information given in (DHS) CSP/CSSP form.
 - 2.2 Dakota County Social Services monthly audit tool will include compliance review relative to receipt and documentation of HIPAA and data privacy information being given at re-assessment.

- 3. Ensure that case files include a completed CAC Application and Reassessment Support Plan that is signed and dated within the past year.** It is required that the primary physician signs the form to certify the level of care needed to confirm eligibility for the CAC waiver program.
 - 3.1 This requirement is on case manager's checklist for CAC.
 - 3.2 Staff have been re-informed of this requirement and need to affirm that MD has signed/returned document.
 - 3.3 Supervisors for CAC service authorizations will be pended until MD signed form is in OnBase.

- 4. Ensure that each working-age participant's case file includes documentation that vocational skills and abilities have been assessed.**
 - 4.1 For current participants---
 - a. In 2015 staff will receive information, training and support related to assessment of vocational skills and abilities.

- b. If documentation on vocational skills/abilities is not present, staff will assess and document each participant's vocational skills and abilities.
 - c. For current participants who will be having 'legacy reassessment' prior to MnCHOICES reassessment, staff will include the vocational skill/ability information into adapted LTC assessment form or CSSP/ISP.
- 4.2 As Dakota County implements MnCHOICES tool with annual re-assessments, this will be documented in both the MnCHOICES data base and in the CSP/CSSP.
- 4.3 CLS is in process of implementing twice a year SSIS documentation regarding participants' employment data. This will remind staff of Dakota County' commitment to 'employment first' policies and best practice.
- 5. Ensure that all participants have a signed and dated individual care plan that is current with the past year included in their case file.**
 - 5.1 In spring 2015, all case managers will be reminded of their responsibility to complete CSSP/ISP within 365 days of last care plan and assure signature.
 - 5.2 SMARTS tool is being adapted to include a field indicating the date of last signed care plan (this will ensure we can distinguish between Service Authorization date spans).
 - 5.3 The Social Services monthly audit tool will include a compliance review relative to the care plan timeline and participant's signature.
- 6. Ensure that case files include the annual BI Assessment and Eligibility Determination form for all BI participants.**
 - 6.1 For current clients having 'legacy' reassessment, staff have been trained regarding the need for this assessment/eligibility determination form to be completed and signed by participant/guardian.
 - 6.2 As MnCHOICES reassessments are completed, the assessment process will accomplish the intentions of this corrective action.
- 7. Case File Compliance worksheet**—Completed/compliant per request on Feb 9, 2015.
- 8. Non-enrolled Vendor Compliance worksheet**—Completed/compliant per request on Feb 9, 2015.

Additional Comments regarding Specific Dakota County Recommendations:

- 1. Create tools to be used consistently across the waiver programs to document provider performance and participant satisfaction.**

Dakota County does concur with the recommendation and is in process of identifying staffing resources to align with tracking providers' performance and participants' satisfaction.

Previous to provider enrollment/licensing moving to the State, Dakota County managed and evaluated our contracted providers in a systematic manner for the full range of issues from

satisfaction to licensing concerns. 2014 was the first year of State enrollment/licensing, and the county role for quality assurance of provider performance in an aggregate manner (vs. case manager monitoring individuals' provider experiences) has been less clear. As State-led regional Quality Councils are established (with clear roles & funding), counties can more effectively develop systems for gathering performance trends. The information collected can then be rolled into regional/state venues that will provide more reliable information regarding providers who serve clients in multiple counties.

2. Dakota County has reserves in the DD Waiver aggregate and is able to provide additional services to participants in these programs.

Dakota County agrees with the fiscal analysis that at end of FY '13 DD had a 8% balance and CCB had a 5% (FY '14) and 7% (FY '13).

We recognize that by the State's broader definition of "waiting list", there are many individuals eligible and on the wait list for DD waiver services. In Dakota County, we ensure a thorough intake and assessment process for each person who is eligible for the DD Waiver, closely monitor how each individual's needs are being met, and monitor when those needs are being adequately met through other State or local services. At the time of the review, all individuals with health and safety needs that were not being met by state or local services were receiving DD Waiver Services. For CCB waivers, at the time of the review, all individuals on the state's wait list were in process of being re-screened. There were no individuals remaining on the CCB wait list after the screening process.

Dakota County is in process of expanding our DD and CCB waiver funding priorities to ensure they reflect the MN Olmstead Plan, the Minnesota Employment First Policy, and the CMS HCBS Rule, so that people are able to receive services in the most integrated setting.