

September 4, 2013

Please accept this as Nobles County's Home and Community Based Services review audit response letter. Nobles County's waiver review was conducted on July 9th and 10th, 2013.

Corrective Action Requirements

The following area required Nobles County to take corrective action:

Submit the Case File Compliance Worksheet within 60 days of the Waiver Review Team's site visit:

Although Nobles County was not required to submit a Correction Action plan on this item, a prompt response to this item was required. The Case File Compliance Worksheet provided detailed information on areas Nobles County was found to be non-compliant for each consumer case file reviewed. This report required follow up on seven cases. All items were corrected by July 29th, 2013 and verification was submitted to the Waiver Review Team to document full compliance. Nobles County submitted the completed compliance report on July 29, 2013.

Recommendations:

The following recommendations would benefit Nobles County and its HCBS participants:

Effective August 1, 2012, assess vocational skills and abilities for all working age participants:

Nobles County regularly assesses and issues referrals for working age participants regarding vocational and employment opportunities. Because this activity must also be documented, we will discuss how to incorporate this documentation into the assessment process. We may include this information directly on the participant's care plan or another form already utilized by staff.

Consider expanding contracted case management services to help serve participants that live out of the region to cut down on travel time, to cover during staffing shortages, and to provide culturally appropriate services:

Nobles County will explore contracted case management options, including service delivery and cost effectiveness. Additionally, Nobles County may consider developing a protocol for when contracted case management is utilized.

Work with providers and neighboring counties to develop services that support participants in their own homes and reduce reliance on more expensive residential or institutional care:

Nobles County has lower rates of participants served at home than its cohort in the CCB, DD, and elderly programs. Nobles County has strong relationships with local providers and may consider collaborating to develop services. By communicating with current and possibly new providers or by sending out a Request for Proposals (RFP) or Request for Information (RFI),

Nobles County could enhance the in-home support provider network. Nobles County will also review the Waiver Review Initiative website for other ideas/information.

Expand opportunities for use of Consumer Directed Community Supports (CDCS), Family Support Grants (FSG), and Consumer Support Grants (CSG) to help reduce reliance on residential services and reach people in more rural areas of the county:

Nobles County strives to serve people in their environment of choice. At times, remote, rural areas pose challenges for several reasons, often because providers have limited staff to serve these areas. During monthly staff meetings, where cases and challenges are discussed, the possibilities of CDCS, FSG and CSG will be open for consideration to serve these consumers.

When possible, use a single, integrated care plan for CADI participants with mental health needs.

Nobles County already assigns a single case manager which helps streamline services for HCBS program participants. We will review the examples of an integrated care plan format from Blue Earth County and Wabasha County found on the DHS Waiver Review Initiative website. It is a strong possibility that Nobles County will incorporate this method into practice.