

Pennington County Human Services

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August 1, 2014

Kim Anderson
Continuing Care Administration
Department of Human Services
PO Box 64974
St. Paul, MN. 55164-0967

RE: Corrective Action Response to HCBS Waiver Review

Dear Ms. Anderson:

The following action plan will be implemented in response to areas identified as needing correction during the recent DHS HCBS program administrative site visit to Pennington County.

It is the agency's plan to share the contents of the Waiver Review report and corrective action requirements with agency case managers. In addition Pennington County Human Services will;

1. Beginning immediately, case managers will ensure all LTC participants have a LTCC assessment that is current within the past year and included in their case file. Case managers and supervisory staff will develop/update a checklist to aid in documentation requirement to ensure compliance.
2. Beginning immediately, case managers will ensure that all participants have a individual care plan that is current within the past year and included in their case file. Case managers and supervisory staff will develop/update a checklist to aid in documentation requirement to ensure compliance.
3. Beginning immediately, participant case files will include an individual care plan signed and dated by the appropriate parties, within the past year and included in their case file. Case managers and supervisory staff will develop/update a checklist to aid in documentation requirement to ensure compliance.
4. Beginning immediately, case managers will ensure all care plans have the two required signatures and include documentation of participant choice in care planning and services. Case managers and supervisory staff will develop/update a checklist to aid in documentation requirement to ensure compliance.
5. Beginning immediately, case managers will ensure all care plans for all participants in all programs contain required documentation including services to be provided, participant needs, health and safety issues, and outcomes and goals.

- Case managers and supervisory staff will develop/update a checklist to aid in documentation requirement to ensure compliance.
6. Beginning immediately, case managers will include a back-up plan in the care plan of all CCB, EW and DD programs. The Case managers and supervisory staff will develop/ update current back-up plan to include three elements: participant's admitting hospital, emergency contact in event that primary caregiver cannot be reached during an emergency, and back-up staffing plans in event that primary staff are unable to provide needed services.
 7. Beginning immediately, case managers will include a completed OBRA Level One form in participant's case file. Case managers and supervisory staff will develop/update a checklist to aid in documentation requirement to ensure compliance.
 8. Beginning immediately, case managers will ensure that all DD cases have a full team screening document fully completed within the required time frames. Case managers and supervisory staff will develop/update a checklist to aid in documentation requirement to ensure compliance.
 9. Beginning immediately, case managers will ensure that all DD cases have a full team screening document fully completed that includes required signatures and dates. Case managers and supervisory staff will develop/update a checklist to aid in documentation requirement to ensure compliance.
 10. Beginning immediately, case managers will ensure that all BI participant case files include the annual BI assessment and Eligibility Determination forms. Case managers and supervisory staff will develop/update a checklist to aid in documentation requirement to ensure compliance.
 11. Beginning immediately, participant case files will include signed documentation that participants have been informed of their rights. This item will be included in the case file requirement checklist. Case managers will have DHS form 1941 or DHS form 2727 to provide to the client for signature and to be included in the file.
 12. Beginning immediately, case managers will conduct face-to-face visits with participants as required. Case managers and supervisory staff will develop/update a checklist to aid in documentation requirement to ensure compliance. Supervisory staff will monitor monthly.
 13. Develop and Implement a caseload management plan that will assure operational compliance of all waiver programs. Supervisory staff and case managers will monitor monthly.

We will monitor the above corrective actions during quarterly case file reviews.

On behalf of the agency's HCBS case managers and Administrative staff, I want to thank the waiver review team for the involvement and feedback in Pennington County's recent

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program review. If questions arise or further clarification is required, we will be happy to respond.

Sincerely,

Julie Sjostrand, Social Service Supervisor

Copy: Ken Yutrzenka, Director