



COUNTY OF STEARNS

DEPARTMENT OF HUMAN SERVICES

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September 10, 2014

Robert F. Meyer, Director
Fiscal Analysis and Performance Management
Continuing Care Administration
Minnesota Department of Human Services
540 Cedar St
St Paul, MN 55101

Dear Mr. Meyer:

Attached please find the response of Stearns County to the recommendations/corrective action plan requirements based on the waiver review in June 2014. Stearns County appreciates the thorough thoughtful review of our services. Our thanks to you and the waiver review team.

Sincerely,

Janet Reigstad

Janet Reigstad
Community Supports Division Director
Phone: 320-656-6125
FAX: 320-656-6460

cw
Attachment

cc: Mark Sizer, Human Services Administrator

Stearns County Human Services**DHS Waiver Review June 2014****Response: Recommendations and Corrective Action Plan Requirements****1. Include details about the participant's services in the care plan**

Stearns County is in the process of fully implementing MnCHOICES, including the required new Community Support Plan/Community Services and Supports Plan (CSP/CSSP). We anticipate DHS has designed this tool to include all necessary information about services.

2. Adopt strategies to reduce current caseloads

Stearns County has initiated the process to review options for decreasing the current caseload. Stearns County plans to actively research potential options over the next few months, such as hiring additional staff, redeploying current staff, limiting work with managed care organizations, and contracting with private providers of case management services.

3. Continue to expand community employment opportunities for individuals with disabilities, particularly in the area of community-based employment in the CCB and DD programs

Stearns County plans to invite Tony Gantenbein, Vocational Policy Consultant with the DHD Disability Services Division to meet with Stearns County management/staff to further discuss/develop recommendations regarding employment. Stearns County plans to convene individual meetings with vocational providers to discuss strategies for expanding community based opportunities. Stearns County plans to perform research with other counties/providers that have demonstrated high rates of community employment.

4. Consider expanding the exception to case banking in the elderly programs to all HCBS waiver programs.

Case banking is a strategy employed to assist with high caseloads and improve the ability of staff to do work accurately and consistently and meet deadlines. However, delays are still experienced. Stearns County plans to continue to review and address how the specific needs of waiver participants can best be met. This review would include determining any feasible strategies to assist clients in ensuring they submit complete applications/reapplications.

5. Consider developing additional practices to provide support and oversight to case managers.

Stearns County plans to implement periodic meetings with all waiver case managers across units/waiver programs to ensure increased consistency in knowledge and interpretation of waiver regulations. Stearns County plans to recommend to the Regional Resource Specialist convening one regional meeting to discuss/clarify all waiver programs with staff (not separate DD and CCB meetings).

6. Continue and expedite your work with providers to develop services that support participants in their own homes and reduce reliance on more expensive residential care. Expand this effort to include all waiver programs.

Stearns County's plan is to use lessons learned in our Alternatives to Foster Care grant project, which currently focuses on persons with Developmental Disabilities, to apply to the broader waiver population.

7. Use consistent practices and formats across the waiver programs to document provider performance and participant feedback.

Stearns County plans to work with staff input to develop a template of questions to ask/items to document in electronic narrative following face-to-face visits with waiver participants.

Corrective Action Requirements:

1. Beginning immediately, ensure that case files include the annual BI assessment and eligibility determination form for all BI participants.

Staff (who work with the BI waiver) were reminded of this requirement in June 2014 following the waiver review. Staff will again receive training at unit meeting by September 30, 2014. This requirement will be added to the BI waiver reassessment checklist by September 30, 2014 to ensure all requirements are met. Supervisor will reinforce this requirement with applicable staff during individual monthly conferences over the next months.

2. Beginning immediately, ensure that case files include the current Related Condition Checklist for all DD participants with a related condition

Staff (who work with the DD waiver) were reminded of this requirement in June 2014 following the waiver review. Staff will again receive training on this at unit meeting by September 30, 2014. By September 30, 2014, a DD waiver reassessment checklist will be developed to include this item. Supervisor will reinforce this requirement with applicable staff during individual monthly conferences over the next months.

3. Beginning immediately, ensure that case files include a completed CAC application and Reassessment Support Plan that is signed and dated within the past year.

Staff (who work with the CAC waiver) were reminded of this requirement in June 2014 following the waiver review. Staff will again receive training at unit meeting by September 30, 2014. By September 30, 2014, a CAC reassessment checklist will be developed to include this item. Supervisor will reinforce this requirement with applicable staff during individual monthly conferences over the next months.

4. Beginning immediately, 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 Minnesota Statutes.

Staff (who work with all waivers) were reminded of this requirement in June following the waiver review. Staff will again receive training on this at unit meetings by September 30, 2014. This requirement will be added to waiver reassessment checklists by September 30, 2014.

Supervisor will reinforce this requirement with applicable staff during individual monthly conferences over the next months.

Stearns County recognizes this issue will also be resolved by full implementation of MnCHOICES and the CSP/CSSP plan that requires client acknowledgement of receiving this information with the annual reassessment.

5. 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.

Staff (who work with waivers) were reminded of this requirement following the waiver review in June 2014. Staff will again receive training on this at unit meetings by September 30, 2014. This requirement will be added to waiver reassessment checklists by September 30, 2014.

Supervisor will reinforce this requirement with applicable staff during individual monthly conferences over the next months.

Stearns County recognizes this issue will also be resolved by full implementation of MnCHOICES and the CSP/CSSP plan that requires client acknowledgement of receiving this information with the annual reassessment.

6. Beginning immediately, ensure that LTC screening for CCB programs occur within 20 days of referral. As of August 1, 2012, MN Statute requires that LTCC assessments be conducted within 20 days of the request.

A Stearns County review of this concern shows that in actuality, 28 out of 30 assessments (93%) of LTCCs were completed within 20 days of referral – with referral being defined as the date the client indicates willingness to participate in the assessment. It is the understanding of Stearns County this will be the criteria for determining the referral date within MnCHOICES. Stearns County's understanding is that although the initial LTCC with a client is completed within 20 days of referral, that by coding the client as placed on the planning/wait list, and then later when the client is taken off the list and to put on the waiver and a reassessment LTCC is completed, the system is pulling the second assessment date instead of the first. Therefore, it appears Stearns is not in compliance. Stearns has initiated further research to understand this issue, and will implement training with staff to ensure correct coding so we receive credit for LTCCs completed within the statutory timeframe.

7. Beginning immediately, ensure that each working-age participant's case file includes documentation that vocational skills and abilities have been assessed.

Stearns County understands the MnCHOICES assessment tool will include vocational related questions. Stearns County is working to fully implement MnCHOICES as soon as possible. Meanwhile, during unit meetings prior to September 30, 2014, staff will be informed of the need to document assessment of vocational skills and abilities by making a note on the LTCC tool or within the SSIS electronic case note for the LTCC. Supervisor will reinforce this requirement with applicable staff during individual monthly conferences over the next months.

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

Staff (who work with waiver programs) were made aware of this requirement following the waiver review in June 2014. Staff will again receive training on this at unit meeting prior to September 30, 2014. Supervisor will reinforce this requirement with applicable staff during individual monthly conferences over the next months.

- 9. Beginning immediately, ensure that all care plans include information documenting the participant's need for 24-hour supervision for all EW participants using customized living services.**

Staff (who work with the EW program) were informed of this requirement in June 2014 following the waiver review. Staff will again receive training on this by September 30, 2014. Supervisor will reinforce this requirement with applicable staff during individual monthly conferences over the next months.

- 10. Submit the Case File Compliance Worksheet within 60 days of the Waiver Review Team's site visit.**

Stearns County completed and submitted the worksheet by the deadline of August 5, 2014.