Home and Community Based Services Lead Agency Review Corrective Action Plan Template Instructions

What are the Corrective Action Plan requirements?

- Once you have received the final Lead Agency Review report for your county, you have 10 days to submit a Corrective Action Plan (CAP) to DHS.
- Your CAP must address each of the corrective actions identified in the report, including your plan to address that particular issue (Lead agency response).
  - Optional: you may choose to respond to the recommendations outlined in the report.
- Once you've finalized your CAP, please submit it to the Lead Agency Review team via email.
- The Lead Agency Review team will review your CAP for completeness. The final version will be posted to the DHS website.
- Questions or concerns can be sent to the Lead Agency Review team. You can also visit our project website to find shared resources, best practices, and recent findings.

How to use the Corrective Action Plan template

1. Enter your lead agency's name in the “Subject” field.
2. Copy and paste your lead agency’s corrective actions from the final report into Table 1.
3. Enter your responses into Table 1.
4. OPTIONAL: repeat steps 2 and 3 for the recommendations.
5. OPTIONAL: enter in additional comments in the space provided.
6. Enter your name in the “Author” field.
7. Enter the date submitted in the “Publish Date” field.
Home and Community Based Services Lead Agency Review
Corrective Action Plan

Lead Agency: Aitkin County Health & Human Services

Table 1. Lead agency response(s) to corrective action(s)

<table>
<thead>
<tr>
<th>Corrective Action</th>
<th>Lead Agency response</th>
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<tr>
<td>Document all of a person’s needs that were identified in the assessment in the support plan.</td>
<td>On 9-28-16 and 10-12-16 results of Lead Agency Review were discussed with HCBS staff. Support plans found to be noncompliant during the review process were remediated and remediation dates were submitted to DHS Review Team. Statutory requirements for support plans were reviewed with Assessors/Case Managers on the above noted dates. It was reviewed that support plans must include: discussion of and attention to all needs identified during assessment process, health and safety issues, client wishes, goals, outcomes and services needed and to be delivered to meet identified needs. As of 10-12-16, Assessors and Case Managers indicated their understanding of this requirement and ACHHS support plan documentation will be compliant with MN Statute requirements.</td>
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Table 2. Lead agency response(s) to recommendations (optional)
<p>| Develop policies and formats used by staff when utilizing non-enrolled vendors to provide Tier 2 and Tier 3 services. Aitkin County needs to update the policies and procedures for using non-enrolled vendors. It is recommended that staff use the current service purchase agreement and log that is found in the CBMS. It is important to establish clear roles for the people managing the process, such as identifying the steps a case manager must follow. Required documents should be saved in a central place that is easily assessable by all staff. A lead agency’s willingness to use this process allows people access to services that might not be readily available in a small rural area. | ACHHS HCBS Team meets every Wednesday morning. It has been an administrative decision to add Tier2/Tier 3 Vendors as a standing agenda item for potential discussion each Wednesday. This allows Case Managers an opportunity to discuss upcoming vendor/purchasing situations that require corresponding paperwork and tracking. An Accounting Technician regularly attends the HCBS Team meeting. It will be the role of the Accounting Tech to work with the appropriate Case Manager to manage the process, including utilization of the purchase agreement, documentation in the log and the retention of required documents. |</p>
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<th>Update business practices regarding the entry of LTC screening documents into DHS systems and the administrative process for opening new individuals to HCBS waiver programs. MN Statute 256B.0911 requires that assessments be conducted within 20 days of the request. To measure this, DHS pulls data from MMIS LTC screening documents. This data for Aitkin County in calendar year 2015 indicates that for all six HCBS waiver programs, only 62% (21 of 34) were assessed within 20 days of the date of referral. Upon further investigation, Aitkin County was able to demonstrate that it was actually 88% and determine that its processes were causing the data to misrepresent its performance on this measure. Aitkin County should update its business practices around how screening documents are entered, which will not only improve the accuracy of the data it reports to DHS, but reduce unnecessary administrative work.</th>
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<td>The ACHHS intake process has been reviewed and determined to be appropriate. A referral date or disposition date is not set until the client or authorized representative agrees to and accepts an assessment (if caller is different than client or A-rep). ACHHS Assessors make every effort possible to find a mutual agreed upon date to complete the assessment within 20 day required time frame. The ability for an assessor to complete a reassessment (and identify it as such) in the MnCHOICES system will eliminate a reassessment being entered as a new assessment, inadvertently causing the system to calculate inaccurately. MMIS data entry processes, including screening docs, has been reviewed with MnCHOICES policy staff and found to be appropriate.</td>
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**Enhance internal systems and practices as a means to increase support for case management staff.** It is recommended that Aitkin County consider using contracted case management services to cover during staffing shortages, and to serve individuals who live out of the region. Other lead agencies have found that contracted case management in these types of situations is an effective use of case management time and helps reduce some burden for case managers during times of staff shortages or when cases require significant travel. Aitkin County would need to require the contracted case managers to adhere to lead agency practices and maintain case files with documentation of all required paperwork. Other recommendations include having a dedicated assessor, a central intake process that relieves case managers of their backup duties, and creating an organized electronic filing system.

HCBS Supervisors and Administration are investigating the potential for contracted case management that may offer support in situations such as: extended leaves for case managers, clients residing a considerable distance from Aitkin County, caseloads reaching a capacity found to be unreasonable. The benefits, processes, requirements and implications to ACHHS are being explored.
Continue to support or develop training for case managers on creating support plans that demonstrate person-centered planning and thinking by adding critical content to each person’s support plan. The support plan is the one document that all people receive, and it should include personalized and detailed information about their plan of care. In accordance with the Person-Centered Thinking training that lead agency case managers have received, people should be asked about their aspirations, where they want to live, what type of work they want to do, and how they want to spend their free time. Only 26% of all case files reviewed contained information about a person’s dreams or aspirations. Conversely, 94% of all files included information on people’s preferred social or leisure activities and identified their preferred living setting. As noted in Appendix B Quality indicators dashboard and Figure 1 Person-centered practices assessment results for Lead Agency (LA) and other counties, Aitkin County has overall strong practices in place at this time. With some additional efforts towards redefining what it means to provide person-centered services, this lead agency has the potential to become a leader in this area. The lead agency should continue to seek out person-centered training for all their staff and work towards becoming a person-centered agency.

Training and continuing education opportunities are shared frequently amongst the HCBS Team. Webinars and video conferences are often viewed as a group. Several Case Managers have indicated interest in the 2-day training opportunity. Supervisors are supportive of opportunities that allow Assessors/Case Managers to continue their professional growth and that allow for further guidance on the tools that are used for assessment, follow up and support planning. Future review requirements such as addressing employment, volunteering goals and desires have been reviewed and discussed with Assessors/Case Managers. It has been recommended that support plans begin including these future requirements for compliance.