In August 2015, the Minnesota Department of Human Services (DHS) conducted a site visit to Itasca County to evaluate its Home and Community Based Service (HCBS) programs for the Lead Agency Review. This review examines how HCBS waivers are being used to meet the needs of community members, monitors compliance with federal and state requirements, and promotes collaboration between lead agencies and DHS.

The review process identified areas of non-compliance, which has required this lead agency to implement changes for remediation. The lead agency’s response must address all corrective actions identified in the report, and may address the recommendations outlined in the report. Reports can be found on the DHS HCBS lead agency review website.

For accessible formats of this publication or assistance with additional equal access to human services, write to dhs.leadagencyreviewteam@state.mn.us, call 800-327-3529, or use your preferred relay service.
In August of 2015 Itasca County Health and Human Services participated in a site visit as a part of the Lead Agency Review Evaluation. This review of the Home and Community Based Service (HCBS) programs resulted in a number of recommendations and three areas in which corrective action is required. At this time, due to the recent retirement of our Public Health Supervisor, we will address some recommendations that we are able to immediately work towards. However, not all will be addressed as we feel that the agency needs time to get our new supervisor in place before addressing a plan to move forward on all of these recommendations. It should be noted that the once the Public Health Supervisor is hired, that person and the Social Services Supervisor will meet and develop a plan and strategies to address the non-addressed recommendations for persons receiving HCBS programs.

Recommendations

Recommendations are developed by the Lead Agency Review Team, and are intended to prompt improvements in the lead agency’s administration of HCBS programs. The following recommendations could benefit Itasca County and people receiving services.

Itasca County Page 18 Response to

Provide additional supports for case managers and assessors. Itasca County Public Health is working on increasing the knowledge base of their case managers by educating them on resources such as policy quest and the Minnesota Health Care Program Manual. They have also been given a new tool to guide their care coordination of managed care clients. Care Coordinators have taken on lead roles in areas such as Customized Living Tools and keeping on top of changes form bulletins and the staff who have taken these roles on will train and provide updates and supports to their team members.

Consider expanding the use of contracted case management. This will be re-visited and re-considered upon hiring of a Public Health Supervisor and after training has occurred.

Expand community based employment opportunities. When staff are hired and trained, we will revisit the assignment of a HCBS team member or supervisor to participate in the Itasca Strategic Alliance group as well as engage with any other employment groups that might be able to better assist in provision of employment opportunities for our disabled populations.

Integrate mental health expertise within CADI case management team to strengthen service delivery. Because Itasca County contracts out their Targeted Case Management, this type of decision will require higher level decision making about whether we continue to support agencies who provide this service and/or also whether or not Itasca County is in a position to hire staff to accommodate this recommendation. The Itasca County Board decides on hiring of new staff, and currently there is a soft hiring freeze in place – especially for non-funded positons. Although we understand this position could generate revenue, this requires some higher level planning and decision-making. We will continue to consider the recommendation and re-visit into the future. We will continue to offer mental health training opportunities to our staff to increase their knowledge in working with this population.
Develop a formal process and tools to document and monitor provider performance across all HCBS programs. The HCBS teams have developed a client survey to monitor provider performance. This will be given/sent to clients beginning in 2016.

Request additional allocations to serve the people on your wait lists in the CCB and DD programs. Both the Public Health Division Manager and the Social Services Supervisor requested additional allocations to manage the wait lists for both DD and CADI/CAC/BI Waivered programs.

Ensure that the support planning process and the support plan itself are person centered. Itasca County is transitioning to utilization of the DHS CSP/CSSP which will be based on person-centered planning.

Corrective Action Requirements

Correction actions are issued when it is determined that a pattern of noncompliance exists regarding one or more HCBS program requirements. A corrective action plan must be developed and submitted to DHS, outlining how the lead agency will bring all items into full compliance. The following are areas in which Itasca County will be required to take corrective action. Because some corrective action items were previously issued at past reviews, Itasca County should review past submissions to ensure the corrective action plan will result in a compliant result.

ITASCA County Page 19 Response to

Complete LTSS MN Choice assessments within 20 days of referral. Itasca County has reviewed some of the specific cases where it was shown that MN Choice Assessments were completed beyond the 20 days after referral. In some instances, there were errors in entry into MMIS, therefore showing there were delays in assessment completion when in actuality, and clients were screened within 20 days of referral. Errors were also found with the conversion of cases from the CADI/CAC/BI wait list to the waiver, errors were made on dates entered into MMIS, resulting in assessments that appeared to have been completed late. When MN Choices rolled out into Itasca County, we had 1 certified assessor for the first month while another assessor was on maternity leave. Since that time, we have had 2 full time MN Choice assessors and our county board has recently authorized the hiring of a third assessor. The hiring should remediate late completion of assessments. We continually monitor referral numbers coming into the county and evaluate staffing needs in accordance.

Include details about person’s services in the support plan. All of the HCBS programs will be utilizing the DHS CSP/CSSP forms in edocs from this point forward with the exception of the Developmental Disabilities Unit who will continue to use the Itasca County ISP format for approximately 50% of their cases. The DD Unit is working on a two year transition plan to the CSP/CSSP DHS format. All details including service provider name, service frequency, service cost (unit amount, monthly cost and annual cost) are currently on the DHS CSP/CSSP format and have been added as a line item to the Itasca County ISP format. This will ensure that all persons are informed regarding the services they are receiving.
Document that each person has been informed of their appeal rights on an annual basis. The Itasca County Home and Community Based Services team (HCBS) has given appeals rights on an annual basis, but there has not been a consistent form with the varying programs that our HCBS service team works in. At one time, the annual receipt of appeal rights was on the release of information, but in 2014, it was removed; with the implementation of MNCHOICES, appeal rights are addressed on the Community Support Plan (CSP) and on the Coordinated Services & Supports Plan (CSSP); at the time of this writing, the HCBS staff has met with the HIPAA director/compliance officer and will be discussing options, including added appeal rights to the release of information. It should also be noted the DD unit has the appeal rights on the sign off page of the Itasca County ISP. Again it should be noted that persons receiving HCBS programs will have an annual CSP/CSSP which will include their appeal rights. Appeal rights are available on the Comprehensive Care Plan utilized for managed care clients.