In July 2016, the Minnesota Department of Human Services (DHS) conducted a site visit to Nobles 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.
Home and Community Based Services Lead Agency Review Corrective Action Plan

Lead Agency: Nobles County

Table 1. Lead agency response to corrective action

<table>
<thead>
<tr>
<th>Corrective Action</th>
<th>Lead Agency response</th>
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<tbody>
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<td>All of a person’s assessed needs are required to be documented in the support plan. MN Statute requires that a support plan documents all of a person’s needs that were identified in the assessment. Services are to be developed and delivered to meet all of a person’s needs.</td>
<td>Nobles County will develop a template to be used as needed by certified assessors/case managers to assist with compliance of this requirement. Beginning Oct 1 – Dec 31, 2016, this requirement along with the use of the template will be reviewed with staff during unit meetings. Between Jan 1 – July 31, 2017, support plans will be reviewed randomly by the supervisor to monitor compliance and any additional training/education needs.</td>
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Lead agency response(s) to recommendations:

Continue to work with providers and neighboring counties to develop services that support people in their own homes and reduce reliance on more expensive residential or institutional care. Nobles County has a lower rate of people served at home compared to its cohort counties. Nobles County will be deliberate in seeking to develop alternatives to residential services in an effort to support people living as independently as possible.

Continue to increase community-based employment opportunities to ensure people with disabilities have choices for competitive, meaningful and sustained employment. Nobles County’s benchmark will be moving three people per year to community-based employment. Nobles County will continue to strengthen its partnerships with providers interested in developing community-based employment opportunities to reduce reliance on center-based employment.

Add Critical Content to each individual’s support plan to make it more person-centered. It is important for Nobles County to set expectations for the quality and content of support plans to create consistency across the lead agency. Nobles County will continue to seek out person-centered training for assessors/case managers as we advance our work towards person-centered planning.
Consider using contracted case management services to provide culturally appropriate services, to cover during staffing shortages, and to serve individuals who live out of the region.  
51% of the people on MA in Nobles County are Caucasian, which has made assessments and providing case management challenging. Contracted case management in these types of situations can help Nobles County to respond to changes in the diversity of people served by the waiver programs.

Consider utilizing non-enrolled venders to provide Tier 2 and Tier 3 services to increase access to needed HCBS services.
Nobles County waiver recipients could benefit from having access to tier 2 and tier 3 services, especially for transportation or home modifications.

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Date Submitted: 10/3/2016