In March 2016, the Minnesota Department of Human Services (DHS) conducted a site visit to Wabasha 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.
Corrective Action Plan - Wabasha County

Home and Community-Based Services Lead Agency Review - March 2016

Recommendations

#1) Adopt a support plan template to create a document that is meaningful and person-centered for all individuals, including those accessing the Elderly Waiver through South Country Health Alliance. During the discovery and assessment process, case managers and assessors should use this as an opportunity to ask people about their dreams, where they want to live and work, and how they want to spend their free time. All of this should be embedded in the support plan and used, in part, to establish meaningful and customized goals. The support plan should also state how those goals will be monitored and by whom to ensure providers are helping each individual realize those goals and dreams. While several of the lead agency’s templates would benefit from enhancements, the one most needing improvement is the one the lead agency is required to use under its contract with South Country Health Alliance. Wabasha County and other members in the alliance must demand updates to the template to better meet DHS’s newly announced person-centered planning requirements. It is also recommended Wabasha County use the DHS-6791B whenever possible, as a review of case files indicated that this template is resulting in a more person-centered and useful plan for people and providers.

Wabasha County's Response: The County agrees and is in the process of reviewing all templates. The County will discuss the need to make changes that better meet person-centered planning requirements with South Country Health Alliance (SCHA).

#2) Take advantage of newly designed Person-Centered Planning and Thinking training opportunities, and once all staff have been trained, develop a plan for how they will apply the learnings in their day to day work. Wabasha County should increase its efforts to seek out person-centered training for their staff and work towards redefining what it means to provide person-centered services. Face-to-face person-centered trainings are also available through DHS’s training partner, the Institute on Community Integration, while on-demand trainings are available through the College of Direct Supports. Once staff have attended the trainings, they should discuss as a team how they can put the training into action on a daily basis. This may involve changes in its agency practices, changes in how it works with other community partners, and changes in how it drafts HCBS support plans.

Wabasha County's Response: The County agrees with this recommendation. All HCBS staff are encouraged to attend relevant trainings and are made aware of available training dates. The County would encourage DHS to work with SCHA to develop a Person-Centered Plan. At this time the County is required to use a SCHA Care Plan which does not meet the requirements of a Person-Centered Plan.

#3) Provide staff in the Home and Community Bases Services unit with additional supports. LTSS programs in Minnesota have undergone a significant number of major changes in recent years, and case managers in many counties are struggling to keep up. Additional supports are needed to assist staff in keeping up with the program changes and managing the
administrative tasks associated with the waiver programs, particularly for case managers working with the disability waivers. With caseloads for staff increasing, they do not have the time to dedicate to training in new staff, attending regional trainings, or reviewing program changes in depth. While nurse case managers working in the EW, AC, and CAC programs have the support of case aide, the social workers working with the DD, CADI, and BI programs do not. Additional support from a case aide could assist with entering screening documents and service agreements, maintaining documents and charts, both paper and electronic, and entering data into the Rate Management System – all of which are billable tasks reimbursed to the county from DHS. In addition, moving all staff to a single system of record keeping, such as PHDoc will promote consistency and reduce training needs.

**Wabasha County's Response:** The County agrees and has made a personnel request to add a case aide position that will be dedicated to half-time HCBS support.

#4) **Work with local vocational providers, schools, and families to increase community-based competitive employment opportunities for people on the DD and CCB waivers.** The State’s Olmstead Plan establishes benchmarks for all counties to increase the number of people with disabilities earning income through community based competitive employment. Wabasha County’s benchmark will be to move three people per year into competitive employment. Wabasha County has close partnerships with local providers and other stakeholders in the community. It also has a large portion of individuals on the DD waiver who are teens or transition age youth (20% of the DD waiver program is age 13 to 22), and more likely to be interested in community-based job. Wabasha County can capitalize on its good relationships with schools and vocational providers to encourage them to offer the services and supports that individuals coming of age will want. Families may also be able to assist with this by making connections with local businesses they own or work for. It is recommended Wabasha County continue working with providers to reduce their use of center-based employment and develop more opportunities that result in higher wages to better meet the emerging demands of its community members.

**Wabasha County's Response:** The County agrees and will initiate conversations with our local providers.

**Corrective action requirements**

#1) **Include details about the person’s services in the support plan.** For each service in an individual’s support plan, the following information must be included per MN Statute 256B.0915 and MN Statute 256B.092: service provider name, service type, service frequency and service cost (unit amount, monthly cost, and annual cost). Overall, 35% of cases reviewed across all programs did not contain all of the required service information. This includes: nine of 12 DD, three of six BI, and four of 10 CADI cases. This information is the minimum required to ensure people are informed about the services they will be receiving.

**Wabasha County's Response:** The County agrees. Following the Lead Agency Review, staff were individually trained on the need to include service details in their support plans. The case manager worksheet template will be shared with staff so it may be utilized when needed. Staff
may also use DHS 6791B which includes the service details information. We do expect that this issue will be completely resolved once MnCHOICES is fully implemented.

#2) Complete LTSS MnCHOICES assessments within 20 days of referral. MN Statute 256B.0911 requires that assessments be conducted within 20 days of the request. For people who newly opened to a waiver program in calendar year 2015, 17% were not assessed within this time frame. This includes 25% of new CADI participants and 33% (three of nine) for DD. Completing assessments and eligibility determinations within 20 days helps ensure prompt access to those needing services.

Wabasha County's Response: The County agrees. Following the Lead Agency Review, staff were individually re-trained on timelines requirements for completing assessments. One problem area we discovered was inconsistency regarding the MnCHOICES referral date. This was being entered as the date we received the client call as opposed to the date the client accepted the screening. That inconsistency has since been corrected and intake staff have been re-trained on the process.

#3) Complete the BI Waiver Assessment and Eligibility Determination form (DHS-3471) annually for all individuals not assessed via MnCHOICES. It is a requirement of the federally approved BI waiver plan that this form be completed by the lead agency and signed by the person. Overall 50% or three of six of BI cases reviewed did not contain this form. The BI Waiver Assessment and Eligibility Determination form verifies eligibility for this specialized waiver program.

Wabasha County's Response: The County agrees. Following the Lead Agency Review, staff were individually re-trained on use of form DHS-3471. We do expect that this issue will be completely resolved once MnCHOICES is fully implemented.