

**SIERRA COUNTY
IN-HOME SUPPORTIVE SERVICES
QUALITY ASSURANCE/QUALITY IMPROVEMENT PLAN**

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Submitted by:
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IHSS Quality Assurance/Quality Improvement Plan FY 2015-2016

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I. Background

The Governor's 2004/2005 State Budget included provisions for the In-Home Supportive Services (IHSS) Quality Assurance/Quality Improvement Initiative. This initiative and the subsequent health and human services' budget trailer bill SB 1104 put in place funding for new State and County Quality Assurance (QA) staff, the IHSS/Personal Care Services Program (PCSP) training program, and systems changes.

The goal of the initiative is to improve the quality of IHSS/PCSP service need assessments, enhance program integrity, and to detect and prevent program fraud and abuse. This plan was written using the following All County Information Notices (ACIN) and All County Letters (ACL) as references: ACIN I-69-04, ACIN I-64-05, ACIN I-24-05, ACL 10-39, and ACL 13-110.

II. Mission, Goals, and Objectives

The mission of the IHSS QA Program is to assist and support the IHSS staff of Sierra County to authorize and provide IHSS services in a uniform, effective, and accurate manner for the benefit of program recipients.

The goals of the IHSS QA Program are to ensure Federal and State regulations, as well as policies and procedures, have been applied correctly, required documents are present, and the need for services is well documented in order to maintain program integrity. This includes activities for fraud detection and prevention in the provision of supportive services. The Sierra County Anti-Fraud investigations are provided by the Sierra County Sheriff's Office through an MOU. This plan is published as a separate document.

The objective of the IHSS QA Program is to help provide services to senior or disabled individuals so they may remain safely in their home. with oversight by CDSS and California Department of Health Care Services (DHCS), and to Sierra County Health and Human Services in the form of statistical summaries obtained from Reviews of IHSS cases. Any problems which appear to be systemic will be identified and a Quality Improvement (QI) plan developed to address them. When CDSS determines a county is out of compliance, CDSS will issue a Quality Improvement Action Plan (QIAP) request. In response, the county must include how and when an issue will be resolved.

III. Quality Assurance Overview

Currently there are three IHSS social worker positions. Two IHSS social worker positions are filled at this time with one vacant position. The IHSS social worker completes all intakes, initial assessments, and reassessments. This social worker also facilitates referrals to the Nevada-Sierra Regional IHSS Public Authority in Grass Valley, California, for all IHSS Registry and Non-Registry Provider enrollment activities. These activities include, but are not limited to: background checks and provider orientation. During the 2015-2016 Fiscal Year, Sierra County will identify one IHSS QA worker. The IHSS QA worker will review the assessments and case work of the IHSS social workers and evaluate for case compliance and appropriateness.

In FY 2015-2016, Desk Reviews will be completed on all case files including those terminated or denied during that year, 6 Unannounced Home Visits, and 1 Targeted Case Review will be conducted. Desk Reviews and Target Case Reviews will be conducted on-site at the Sierra County Loyalton IHSS office. Cases are chosen at random for Unannounced Home Visits. Sierra county will create standardized County forms that will be utilized by the QA worker which allows review of the same components, and interpret findings uniformly.

The IHSS QA worker completes Reviews of selected IHSS cases. The purpose of Reviews is to provide information for consistent case management and program uniformity, as well as assure compliance with State and County IHSS regulations. This process also identifies need for staff training and policy clarification. Additionally, the Desk Review, the Unannounced Home Visit, and any necessary follow-up confirm the information in the case record accurately reflects the client's circumstances.

A Desk Review must include: a sample of terminated and denied cases, validation of case file information by recipient contact; and verify:

- Required forms are present, completed, and contain appropriate signatures,
- A dated Notice of Action form in the case file for the current assessment period,
- Need for each service and hours authorized is documented,

Unannounced Home Visits include:

- A sub-sample of Desk Reviews to confirm the assessment is consistent with the recipient's needs for services, and

- The applicable Federal and State laws and policies have been followed in the assessment process.

The objective of the Targeted Desk Review is to focus on singular topics to ensure compliance with current policy and/or procedures.

As mentioned above, the IHSS QA worker will also review a sample of terminated cases and denied applications. The purpose of these Reviews is to validate the termination or denial is consistent with regulations and the County has taken all necessary steps prior to terminating the case or denying the application. Necessary steps include, but are not limited to: making appropriate contacts to obtain required information and providing assistance when needed.

As Reviews are completed, they are submitted to the adult services supervisor to go over QA results which may include recommended correction and improvement activities. The adult services supervisor and the IHSS social worker staff all Case File Reviews. If additional correction and improvement activities are necessary, a plan of action is created. If all parties are in agreement with the findings, and necessary correction and improvement activities have been accomplished, the Review process is considered complete. If an issue cannot be resolved, it will be elevated to the Assistant Director of Health and Human Services for resolution.

Targeted Case Reviews differ from routine, scheduled Desk Reviews in that rather than a focus on the recipient receiving the correct services at a level which allow him/her to remain safely in his/her home, the focus is limited to single issues identified by the IHSS QA worker. Examples of Targeted Reviews may include any of the following:

- Timely Assessments and Reassessments
- Provider Enrollment Form
- Voluntary Services Form
- Paramedical Services Form
- Protective Supervision Cases
- Hours Exceed Guidelines
- Able and Available Spouse
- Services for Children
- Proration Calculations
- Provider 300+ Paid Hours Report
- No Timesheet Activity Report
- Specific Service categories

- Any area leading to overall improvement

Specific problematic areas will be targeted for special review, to assure all cases in a specific class are following current policies and procedures. The IHSS cases are either found to be in compliance or not in compliance. The adult services supervisor receives the Reviews directly and is responsible for assuring future compliance.

A 1.0 FTE QA Worker position and a 0.5 FTE staff position for Anti-Fraud Investigation have been allocated by the State. Sierra County will not be claiming 1 FTE. It is our expectation a .6 FTE will be able to complete at a minimum of 25 desk reviews and a minimum of 5 home visits in the FY 2015-2016. The working title of the IHSS QA worker has not been determined at this time. The Sierra County pay scale typography for the QA worker position has not been identified. The IHSS QA worker will report directly to the adult services supervisor. The Anti-Fraud Investigation will be contracted through the Sierra County Sheriff's Office.

IV. Discovery Methodology

Sierra County will collect data from the following sources in order to assess the quality of ongoing operations and services provided to Community First Choice Option (CFCO), Personal Care Services Program (PCSP), IHSS Plus Option, and IHSS Residual recipients:

- Supervisory review of cases of all applications and reassessments
- Quality Assurance Reviews conducted by the IHSS QA worker
- Information received from State monitoring activities
- Case Management, Information and Payrolling System (CMIPS II) reports
- Review of complaints/fair hearing outcomes
- Consumer/Partner Input
 - IHSS Public Authority
 - Direct consumer input
- Fraud Detection and Prevention Activities
 - Anti-Fraud allegations will be referred to the Sierra County Sheriff for remediation.

V. Remediation Process

Sierra County will utilize the data received through the processes outlined in the discovery methodology to identify and correct problems/errors detected. Problems/errors will fall into two categories: individual case or systemic.

Individual Case Problems/Errors

Errors discovered through either the supervisory or QA Review process will be brought to the assigned social worker's attention by the adult services supervisor after reviewing the QA Monitoring Case Review Checklist. If an action is needed, the case file is returned to the assigned social worker along with the QA Monitoring Case Review Checklist describing necessary changes. The social worker will make corrections using the QA Monitoring Case Review Checklist. Should no action be necessary but a procedural issue has been discovered, the adult services supervisor will determine if this is an issue the assigned social worker is struggling with or if it is a systemic problem/error which includes all staff. The adult services supervisor's response will be based on this determination. Although it may be identified as an individual social worker struggle, should the issue continue, formalized training may be provided to all social workers.

Systemic Problems/Errors

Should problems/errors be found across staff and/or the frequency of the error is high, the issue will be brought to the attention of both the adult services supervisor and the Assistant Director of Health and Human Services by the QA worker for review. The QA worker will provide recommendations for corrective action. The corrective action may include training, and/or Departmental policy and procedure development or revision. If necessary, California Department of Social Services IHSS may be contacted to request clarification of State policy or procedure.

VI. County Response to Critical Incidents

Sierra County defines a critical incident as any incident/event which presents an immediate threat to the health and/or safety of a recipient and requires County intervention. Critical Incidents may include but are not limited to: serious injuries caused by accident, medication error/reaction, abuse or neglect. In addition, this includes any potentially harmful natural or man-made event that threatens a recipient's life, health, or ability to remain safely in their own home. Examples of this type of critical incident include but are not limited to: fire, earthquakes, floods, extreme weather conditions, power outages and hazardous material spills.

Countywide incidents are managed by Sierra County Office of Emergency Services. Sierra County Department of Health and Human Services is a part of this network. IHSS maintains a disaster preparedness list of impaired recipients and will provide it to first responders.

Personal events in a recipient's life that may result in physical, emotional, or financial harm, or may negatively affect their ability to remain independent are considered critical incidents. Sierra County has a social worker designated as on call 7 days a week and a 24-hour emergency number available to receive and act on emergency reports. Should a critical incident of this nature be discovered, it shall immediately be reported to the on duty social worker. Whenever applicable, the social worker will coordinate with local law enforcement to ensure the recipient's safety.

Critical incidents will be documented through the use of a tracking sheet (See Attachment A). This tracking sheet will include the date, time, and a summary of the incident. This sheet will be kept in the recipient's IHSS case and a copy will be provided to the QA worker for data collection. Critical incidents will also be reported to Adult Protective Services (APS) or Child Protective Services (CPS) as noted on the Critical incident tracking sheet.

VII. Data Matches

WIC Section 12305.71 (c) (1) requires County QA staff will be in receipt of, resolve, and respond appropriately to claims Data Match discrepancies or to other State level QA and program integrity information indicating potential overpayments and/or underpayments for supportive services.

State QA staff receives a report from the State Controller's Office, which is then sent to the County with a cover letter and appropriate forms for reporting investigation findings. The County IHSS QA worker will be responsible for the follow up investigation and completion of the State QA reporting forms.

The IHSS QA worker will be responsible for investigation and completion of forms sent to the County regarding all data matches. The IHSS QA worker may perform the following activities in investigating the Data Match discrepancies:

- Verify the individual match is not deceased and an incorrect Social Security number was entered into CMIPS. Then ensure it is corrected.
- Meet with the individual match (recipient or provider) and view their photo ID and Social Security card to verify the match is not deceased.

- Verify the individual match is deceased, an overpayment occurred, and overpayment recovery action has been initiated.
- Verify the individual match is deceased, an overpayment occurred, and a fraud referral has been made to the Sierra County Sheriff. It will be indicated to whom a fraud referral was made, whether to the County IHSS social worker, Department of Health and Human Services Fraud Investigator (Sierra County Sheriff), or District Attorney.

VIII. Third-Party Liability

WIC Section 12305.71 (c) (1) requires County QA staff implement procedures to identify potential sources of third-party liability for supportive services. Examples of third-party liability resources include Workers' Compensation insurance, Long-Term Care insurance, Victim Compensation Program payments, and civil judgments/pending litigations.

The County IHSS QA worker may become knowledgeable of the existence of third-party sources while performing routine QA activities including but not limited to: Targeted Reviews, Desk Reviews, and Unannounced Home Visits. The IHSS QA worker will immediately document in writing pertinent information and forward to the adult services supervisor and assigned IHSS social worker when any third-party sources are found. The County IHSS QA worker will also immediately notify the State of California, Department of Health Care Services, Third Party Liability, at 916-650-0430. Department of Health Care Services will tell the County IHSS QA worker how and where to submit the necessary documentation concerning third-party liability issues.

IX. Person-Centered Planning

Consumer Rights and Responsibilities

Recipients are provided with the following forms at application and renewal:

- Publication 13, Your Rights Under California Welfare Programs,
- Individual Emergency Back-up Plan (SOC 827) or Individualized Back-Up Plan and Risk Assessment (SOC 864),
- An information sheet regarding the IHSS program outlining the recipient's role, and
- Recipient/Employee Responsibility Checklist (SOC 332).

These forms are reviewed with the recipient by the IHSS social worker.

Whenever possible, the forms are provided to the recipient in their preferred

language. Additional forms and materials in other languages are readily available via the internet and CDSS site.

Sierra County Health and Human Services maintains a Memorandum of Understanding (MOU) with Spanish bilingual contractors to assist individuals whose primary language is Spanish. Other than those who speak Spanish, individuals whose first contact with the Department is in person are immediately offered the “I speak...” card in order to identify their primary language. If the individual fails to self-identify his or her primary language, a language line is utilized to identify the primary language and for translation of interpreter services available and appointment scheduling.

The use of interpreters and other language forms is documented in the IHSS social worker’s narrative. Need for special accommodations due to disability or special language needs are noted in/on the physical case record.

Access to Advocacy/Alternative Community Resources

Recipients are referred to the services as needed or requested. Currently there is no formal referral process for adult services. There is no advocacy group/program available in Sierra County. Sierra County will develop a protocol for assisting individuals in identifying natural supports and resources.

Contacting the Assigned Social Worker

Information on how to contact their assigned social worker is provided to recipients through the following:

- All applications and renewal packets include a cover letter which provides information on how to contact IHSS.
- All notices provided to the recipient have the assigned social worker’s identifying information listed.
- At the home visit, the assigned social worker provides the recipient with their business card and instructs the recipient how to contact them.
- Recipients may contact either the Loyalton or Downieville Health and Human Services office to inquire about their assigned social worker and how to contact them.

Accessing Back-up Options for Care

Recipients are encouraged to develop their own back-up plans. Generally during the assessment/reassessment process, the IHSS social worker assists the recipient in completing the Individual Emergency Back-Up Plan (SOC 827). The

Individualized Back-Up Plan and Risk Assessment (SOC 864) is completed for all IHSS recipients. Sierra County has a social worker designated as on call 7 days a week and a 24-hour emergency number available to receive and act on emergency reports. The Sierra County on duty social worker responds to emergency situations during normal work hours. The on call social worker responds to emergency situations after hours.

X. Quality Improvement Measures

Identified Improvements

Potential areas for quality improvement will be identified through Quality Assurance activities including, but not limited to:

- Desk Reviews,
- Unannounced Home Visit Reviews,
- Targeted Case Reviews,
- Identification of critical events,
- Supervisor review of cases,
- Identification of suspected fraud,
- Collaboration with the IHSS Anti-Fraud Investigator (Sierra County Sheriff),
- Data Match discrepancies,
- Input from staff, Public Authority, or other involved agencies,
- State Hearing decisions, and
- Direct Mailings.

The County IHSS QA worker, the adult services supervisor, and the Assistant Director of Health and Human Services will meet to review:

- Quality Assurance findings,
- Overpayments and underpayments,
- Fraud referrals and findings,
- Exemplary work by social workers and best practices,
- Training needs,
- Policy and procedures, and
- Other identified system wide changes for program improvement.

All new information, including All County Information Notices (ACIN) and All County Letters (ACL) regarding any IHSS changes is reviewed by the adult services supervisor. A copy of the new information is given to the IHSS social workers and the QA worker by the adult services supervisor. A plan for

implementation is explained and implemented. All changes in IHSS will be implemented timely in Sierra County in accordance with instructions from CDSS.

Additionally, any information discovered by QA activities is treated in the same manner by the Assistant Director of Health and Human Services. Information and training is given during staff meetings and written material is always given to the IHSS social worker.

Proposed Improvements

Following the 2014-2015 CDSS Site Review, Sierra County resolved to implement improvement processes for the IHSS program. All recommended updates and corrections from the Site Review will be completed in the time-frame expected by CDSS. A formalized QA process will be implemented during the 2015-2016 FY with the procedures described within this plan. The creation of a QA position is necessary to implement the QA/QI Plan. This process can be lengthy and difficult for a county the size of Sierra. Since other Health and Human Services programs are in need of QA/QI, Sierra County is considering the possibility of an individual fulfilling all tasks or if necessary a unit established, as well as discussing contract options with other small counties. Until this would occur, the adult services supervisor and social workers are dedicated to improve QA/QI in Sierra County by implementing uniform procedures for all new applications and reassessments.

Specifically, a letter will be mailed to all new applicants introducing the IHSS program and provide contact information from the IHSS social worker. This letter will also include initial paperwork which may be completed prior to the initial assessment. Packets will be created which will include any necessary paperwork and/or handouts for an application. Prior to completion of an assessment and/or reassessment, the adult services supervisor will be the first QA review for application completion. The County IHSS will also include staff and administration review of current policy and procedures. It is imperative the policy and procedures align with the QA/QI Plan and the Anti-Fraud Plan.

Sierra County will ensure all IHSS social workers and the adult services supervisor receive all necessary training for program implementation as well as other optional adult services trainings. Sierra County will create an IHSS presentation for the senior centers, long-term care facilities, community organizations and faith based organizations to provide accurate information to community members about IHSS services. An informational mailing will also be sent to current known medical providers serving current recipients as well as local providers which will include IHSS program information, social worker contact information and an invitation for face to face meetings to allow providers to obtain accurate information regarding IHSS services. An adult mandated reporter

training will be designed and offered to providers in the area as well as the senior centers. This will also allow for distribution of program information.

XI. Quality Assurance Annual Budget Plan FY 2015-2016

Please see Attachment B.

XII. Fraud Detection/Anti-Fraud Plan

The Sheriff's Office provides this service through an MOU.

XIII. Signature and Attest of Policy and Procedures

I, Lea Salas, Assistant Director for Sierra County Health and Human Services attest the above Sierra County In-Home Supportive Services Quality Assurance/Quality Improvement Plan includes all current Policy and Procedures and any proposed Program Improvement.

Signature

Date

IHSS Quality Assurance
CRITICAL INCIDENT REPORT

Recipient Name: _____

Date of Report: _____ **Reporter:** _____

Date of Incident: _____

Type of Incident (circle those that apply)

- | | |
|---|--|
| <input type="checkbox"/> Hospitalization | <input type="checkbox"/> Suspected Abuse or Neglect |
| <input type="checkbox"/> Environmental Health Contamination | <input type="checkbox"/> Heat/Cold Related Emergency |
| <input type="checkbox"/> Personal Event | <input type="checkbox"/> Other |

Summary of Event

Attachment(s)

APS report made: Yes No

CPS report made: Yes No

QA Staff: _____ **Date:** _____

Copy to:
IHSS File

Attachment A
