

**Harbor Regional Center
Targeted Case Management and
Nursing Home Reform
Monitoring Review Report**

Conducted by:

Department of Developmental Services

May 11-14, 2009

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EXECUTIVE SUMMARY

The Department of Developmental Services (DDS) conducted a federal compliance monitoring review of the Targeted Case Management (TCM) and Nursing Home Reform (NHR) programs May 11-15, 2009, at Harbor Regional Center (HRC).

Purpose of the Review

Case management services for regional center consumers with developmental disabilities were added as a medical benefit to the Medi-Cal State Plan in 1986 under Title XIX of the Social Security Act. TCM services are those “. . . services which will assist individuals in gaining access to needed medical, social, educational, and other services.” DDS implemented the TCM program statewide on July 1, 1988.

The NHR Pre-Admission Screening/Resident Review (PAS/RR) program involves determining whether an individual in a nursing facility with suspected developmental disabilities is developmentally disabled and requires specialized services.

Overview of the TCM/NHR Compliance Monitoring Protocol

The review criteria for the TCM and NHR programs are derived from federal and state statutes and regulations and the Centers for Medicare & Medicaid Services guidelines relating to the provision of these services.

Findings

Section I – Targeted Case Management

Thirty one consumer records, containing 2,240 billed units, were reviewed for three criteria during the period of review. The sample records were 100% in compliance for criterion 1 (TCM service and unit documentation matches the information transmitted to DDS), 98% in compliance for criterion 2 (TCM service documentation is consistent with the definition of TCM service), and 100% in compliance for criterion 3 (TCM service documentation identifies appropriate HRC personnel who completed the entry).

Section II – Nursing Home Reform

Ten consumer records were reviewed for three criteria. The sample records were 100% in compliance for two criteria. One criterion (claim submitted for referral disposition) was 90% in compliance.

SECTION I TARGETED CASE MANAGEMENT

Criterion

1. The Targeted Case Management (TCM) service and unit documentation matches information transmitted to the Department of Developmental Services (DDS).

Findings

The sample of 31 consumer records contained 2,240 billed TCM units. All of the recorded units matched the number of units reported to DDS.

Recommendations

None.

2. The TCM service documentation billed to DDS is consistent with the definition of TCM service.

Allowable TCM units are based on services which assist consumers to gain access to needed social, educational, medical or other services and include the following components: 1) assessment and periodic reassessment to determine service needs; 2) development and periodic revision of an individual program plan (IPP) based on the information collected through the assessment or reassessment; 3) monitoring and follow-up activities, including activities and contacts that are necessary to ensure that the IPP is effectively implemented and adequately addresses the needs of the consumer; and 4) referral and related activities to help the consumer obtain needed services. However, it is important to note that TCM does not include the direct provision of these needed services.

Findings

Of the 2,240 billed units, 2,195 (98%) of the units contained descriptions that were consistent with the definition of TCM services. Forty five of the billed TCM units had descriptions of activities that were not consistent with the definition of TCM services or were not sufficient to determine if the activities could be considered case management. Detailed information on these findings and the specific actions required has been sent under separate cover letter.

Recommendation	Regional Center Plan/Response
<p>HRC should ensure that the time spent on the identified activities that are inconsistent with TCM claimable services (sent separately) is reversed.</p>	<p>HRC will reverse all questioned TCM units. In addition, HRC will revise Guidelines/Tips for Case Management Activity and attach to HRC procedure # 2415 – TCM (Title XIX) Documentation.</p> <p>Additional training on case management activity documentation (TCM) which will include HRC procedure #2415 and revised Guidelines/Tips for Case Management Activity will be provided to staff.</p> <p>All program managers will continue to complete random reviews of case management activity notes for each counselor on a monthly basis.</p>

3. The TCM documentation identifies the service coordinator recording the notes and each note is dated.

Findings

The TCM documentation in the 31 sample consumer records identified the service coordinator and the date the note was completed.

Recommendations

None.

SECTION II NURSING HOME REFORM

Criterion

1. There is evidence of dispositions for the Department of Developmental Services' (DDS) Nursing Home Reform (NHR) referrals.

Findings

The ten sample consumer records contained either a Pre-Admission Screening/Resident Review (PAS/RR) Level I document or NHR automated printout.

Recommendation

None.

2. The disposition is reported to DDS.

Findings

The ten sample consumer records contained either a PAS/RR Level II document or written documentation responding to a Level I referral.

Recommendation

None.

3. The regional center submitted a claim for the referral disposition.

Findings

The billing information for nine of the ten sample consumers has been entered into the AS 400 computer system and electronically transmitted to DDS. However, the billing information for the Level II activity for consumer #X had not been entered and transmitted to DDS.

Recommendation	Regional Center Plan/Response
HRC should ensure that billing information for consumer #X is transmitted to DDS.	Billing for level II activity will be entered and transmitted to DDS.

SAMPLE CONSUMERS

TCM Review

#	UCI
1	XXXXXXXX
2	XXXXXXXX
3	XXXXXXXX
4	XXXXXXXX
5	XXXXXXXX
6	XXXXXXXX
7	XXXXXXXX
8	XXXXXXXX
9	XXXXXXXX
10	XXXXXXXX
11	XXXXXXXX
12	XXXXXXXX
13	XXXXXXXX
14	XXXXXXXX
15	XXXXXXXX
16	XXXXXXXX
17	XXXXXXXX
18	XXXXXXXX
19	XXXXXXXX
20	XXXXXXXX
21	XXXXXXXX
22	XXXXXXXX
23	XXXXXXXX
24	XXXXXXXX
25	XXXXXXXX
26	XXXXXXXX
27	XXXXXXXX
28	XXXXXXXX
29	XXXXXXXX
30	XXXXXXXX
31	XXXXXXXX

NHR Review

#	UCI
1	XXXXXXXX
2	XXXXXXXX
3	XXXXXXXX
4	XXXXXXXX
5	XXXXXXXX
6	XXXXXXXX
7	XXXXXXXX
8	XXXXXXXX
9	XXXXXXXX
10	XXXXXXXX

**ATTACHMENT I
 TCM DISTRIBUTION OF FINDINGS**

CRITERION PERFORMANCE INDICATOR Sample Size: 50 Records Billed Units Reviewed: 2,240	# OF OCCURRENCES			% OF OCCURRENCES	
	YES	NO	NA	YES	NO
1. The TCM service and unit documentation matches the information transmitted to DDS.	2240			100	
2. The TCM service documentation billed to DDS is consistent with the definition of TCM service.	2195	45		98	2
3. The TCM service documentation is signed and dated by appropriate regional center personnel.	2240			100	

NHR DISTRIBUTION OF FINDINGS

CRITERION PERFORMANCE INDICATOR Sample Size: 10 Records	# OF OCCURRENCES			% OF OCCURRENCES	
	YES	NO	NA	YES	NO
1. There is evidence of dispositions for DDS NHR referrals.	10			100	
2. Dispositions are reported to DDS.	10			100	
3. The regional center submits claims for referral dispositions.	9	1		90	