

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

**Conducted by:**

**Department of Developmental Services**

**February 3 - 6, 2014**

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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 February 3 - 6, 2014, at Inland Regional Center (IRC). The monitoring team selected 50 consumer records for the TCM review. A sample of 10 records was selected from consumers who had previously been referred to IRC for a NHR assessment.

### 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

Fifty consumer records, containing 3,813 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), 99% 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 the service coordinator recording the notes and each note is dated).

#### Section II – Nursing Home Reform

Ten consumer records were reviewed for three criteria. The 10 sample records were 100% in compliance for all three criteria.

## 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).

### Finding

IRC transmitted 3,813 TCM units to DDS for the 50 sample consumers. Documentation supporting all of these units was found in the sample consumer records.

### Recommendation

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.

### Finding

The sample of 50 consumer records contained 3,813 billed TCM units. Of this total, 3,763 (99%) of the units contained descriptions that were consistent with the definition of TCM services. Fifty 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 will be sent under a separate cover letter.

Recommendation	Regional Center Plan/Response
IRC should ensure that the time spent on the identified activities that are inconsistent with TCM claimable services (sent separately) is reversed.	IRC WILL REVERSE THE TCM UNITS THAT ARE INCONSISTENT WITH CLAIMABLE TCM'S.

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

Finding

The TCM documentation in the 50 sample consumer records identified the service coordinator and the date of the service.

Recommendation

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.

### Finding

The 10 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.

### Finding

The 10 sample consumer records contained either a PAS/RR Level II document or written documentation responding to the Level I referral.

### Recommendation

None

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

### Finding

The billing information for the 10 sample consumers had been entered into the AS 400 computer system and electronically transmitted to DDS.

### Recommendation

None

## SAMPLE CONSUMERS

### TCM Review

#	UCI	#	UCI
1	XXXXXXXX	42	XXXXXXXX
2	XXXXXXXX	44	XXXXXXXX
4	XXXXXXXX	46	XXXXXXXX
7	XXXXXXXX	47	XXXXXXXX
8	XXXXXXXX	48	XXXXXXXX
9	XXXXXXXX	50	XXXXXXXX
10	XXXXXXXX	53	XXXXXXXX
11	XXXXXXXX	54	XXXXXXXX
14	XXXXXXXX	56	XXXXXXXX
15	XXXXXXXX	59	XXXXXXXX
16	XXXXXXXX	60	XXXXXXXX
19	XXXXXXXX	61	XXXXXXXX
20	XXXXXXXX	66	XXXXXXXX
22	XXXXXXXX	67	XXXXXXXX
24	XXXXXXXX	68	XXXXXXXX
25	XXXXXXXX	70	XXXXXXXX
26	XXXXXXXX	72	XXXXXXXX
28	XXXXXXXX	73	XXXXXXXX
29	XXXXXXXX	74	XXXXXXXX
32	XXXXXXXX	78	XXXXXXXX
35	XXXXXXXX	79	XXXXXXXX
36	XXXXXXXX	82	XXXXXXXX
38	XXXXXXXX	83	XXXXXXXX
40	XXXXXXXX	84	XXXXXXXX
41	XXXXXXXX	86	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**

<b>CRITERION PERFORMANCE INDICATOR</b> Sample Size: 50 Records Billed Units Reviewed: 3,813	<b># OF OCCURRENCES</b>			<b>% OF OCCURRENCES</b>	
	<b>YES</b>	<b>NO</b>	<b>NA</b>	<b>YES</b>	<b>NO</b>
1. The TCM service and unit documentation matches the information transmitted to DDS.	3,813			100%	
2. The TCM service documentation billed to DDS is consistent with the definition of TCM service.	3,763	50		99%	1%
3. The TCM service documentation is signed and dated by appropriate regional center personnel.	3,813			100%	

**NHR DISTRIBUTION OF FINDINGS**

<b>CRITERION PERFORMANCE INDICATOR</b> Sample Size: 10 Records	<b># OF OCCURRENCES</b>			<b>% OF OCCURRENCES</b>	
	<b>YES</b>	<b>NO</b>	<b>NA</b>	<b>YES</b>	<b>NO</b>
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.	10			100	