San Gabriel/Pomona Regional Center Targeted Case Management and Nursing Home Reform Monitoring Review Report

Conducted by:

Department of Developmental Services

September 8 - 10, 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 from September 8 - 10, 2014, at San Gabriel/Pomona Regional Center (SG/PRC). The monitoring team selected 34 consumer records for the TCM review. A sample of ten records was selected from consumers who had previously been referred to SG/PRC 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

Thirty- four consumer records, containing 2,135 billed units, were reviewed for three criteria. The sample records were 100% in compliance for criterion 1 (TCM service and unit documentation matches the information transmitted to DDS), 97% 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 individual who wrote the note and the date the note was completed).

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).

<u>Finding</u>

SG/PRC transmitted 2,135 TCM units to DDS for the 34 sample consumers. All of the recorded units matched the number of units reported to DDS.

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 34 consumer records contained 2,135 billed TCM units. Of this total, 2,071 (97%) of the units contained descriptions that were consistent with the definition of TCM services. Sixty-four of the units had descriptions of activities that were not consistent with the definition of TCM services. Detailed information on these findings and the actions required will be sent under a separate cover letter.

Recommendation	Regional Center Plan/Response
SG/PRC should ensure that the time claimed on those identified activities that are inconsistent with TCM claimable services (sent separately) is reversed.	SGPRC will continue to monitor TCM claimable services. Manager of Client Services continue to train their Service Coordinator in identifying and inputting TCM claimable services.

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

Finding

The TCM documentation in the 34 sample consumer records identified the service coordinator who wrote the note and the date the service was completed.

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.

<u>Finding</u>

The 10 sample consumer records contained a copy of the Pre-Admission Screening/Resident Review (PAS/RR) Level I form, or NHR automated printout.

Recommendation

None.

2. The disposition is reported to DDS.

<u>Finding</u>

The ten sample consumer records contained 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 ten 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	XXXXXXX	18	XXXXXXX
2	XXXXXXX	19	XXXXXXX
3	XXXXXXX	20	XXXXXXX
4	XXXXXXX	21	XXXXXXX
5	XXXXXXX	22	XXXXXXX
6	XXXXXXX	23	XXXXXXX
7	XXXXXXX	24	XXXXXXX
8	XXXXXXX	25	XXXXXXX
9	XXXXXXX	26	XXXXXXX
10	XXXXXXX	27	XXXXXXX
11	XXXXXXX	28	XXXXXXX
12	XXXXXXX	29	XXXXXXX
13	XXXXXXX	30	XXXXXXX
14	XXXXXXX	31	XXXXXXX
15	XXXXXXX	32	XXXXXXX
16	XXXXXXX	33	XXXXXXX
17	XXXXXXX	34	XXXXXXX

NHR Review

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

ATTACHMENT I

TCM DISTRIBUTION OF FINDINGS

CRITERION PERFORMANCE INDICATOR Sample Size: 34 Records	# OF OCCURRENCES			% OF OCCURRENCES	
Billed Units Reviewed: 2,135	YES	NO	NA	YES	NO
 The TCM service and unit documentation matches the information transmitted to DDS. 	2,135	0		100	
2. The TCM service documentation billed to DDS is consistent with the definition of TCM service.	2,071	64		97	3
3. The TCM service documentation is signed and dated by appropriate regional center personnel.	2,135	0		100	

NHR DISTRIBUTION OF FINDINGS

CRITERION PERFORMANCE INDICATOR Sample Size: 10 Records	# OF OCCURRENCES			% OF OCCURRENCES	
	YES	NO	NA	YES	NO
 There is evidence of dispositions for DDS NHR referrals. 	10	0		100	
2. Dispositions are reported to DDS.	10	0		100	
3. The regional center submits claims for referral dispositions.	10	0		100	