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).

Finding

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.

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.

Finding

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.

Finding

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	7305449	18	5471818
2	7925295	19	5545264
3	7930406	20	7931600
4	7319507	21	6630533
5	7921456	22	6803697
6	7926074	23	1978889
7	5662028	24	7922904
8	7301639	25	7999716
9	6025050	26	5788617
10	7301739	27	7923047
11	1977087	28	5059126
12	7302739	29	5446984
13	7914980	30	7998036
14	7925748	31	7907745
15	7921432	32	7904925
16	7924002	33	7912425
17	1977483	34	7918049

NHR Review

#	UCI
1	7922898
2	7998915
3	7926323
4	H003773
5	7931083
6	6213739
7	7920748
8	H003794
9	7920213
10	7921466

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
1. 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	