

CORRECTIVE ACTION PLAN:

1. PRIVACY PRACTICES IN ACCORDANCE WITH HIPPA:

Beginning immediately, ensure that each participant case file includes signed documentation that participants have been informed of the county's privacy practices in accordance with HIPPA on an annual basis.

- *All participant files that were missing the documentation of a signature and date that the person received their privacy rights notification have been remediated.*
- *All waiver participants will be asked to sign and date documentation that they have received privacy practices/HIPPA notice annually and this documentation will be in the participants' case file.*
- *Compliance monitoring will be conducted on at least a semi-annual basis through the use of file audits. These will be conducted by supervisor review and/or peer review. Documentation of file review will be kept in the participants' case file.*

2. SIGNED DOCUMENTATION THAT PARTICIPANT HAS BEEN INFORMED OF RIGHT TO APPEAL ON AN ANNUAL BASIS.

Beginning immediately, ensure that each participant case file includes signed documentation that participants have been informed of their right to appeal on an annual basis.

- *All participant files that were missing signed documentation of the participant's right to appeal have been remediated.*
- *All waiver participants will be asked to sign and date documentation that they were provided information regarding their right to appeal annually and this documentation will be in the participants' case file.*
- *Compliance monitoring will be conducted on at least a semi-annual basis through the use of file audits. These will be conducted by supervisor review and/or peer review. Documentation of file review will be kept in the participants' case file.*

3. OBRA LEVEL ONE DOCUMENTATION:

Beginning immediately, ensure that all LTC participants include a completed OBRA Level One form in their case file.

- *OBRA Level I forms that were incomplete have been completed for remediation.*

- *Otter Tail County Human Services has educated all case managers that both sections of the OBRA Level One need to be completed (developmental disability and mental health diagnosis) for all participants regardless of diagnosis.*
- *Compliance monitoring will be conducted on at least a semi-annual basis through the use of file audits. These will be conducted by supervisor review and/or peer review. Documentation of file review will be kept in the participants' case file.*

RECOMMENDATIONS:

1. EFFECTIVE AUGUST 1, 2012, ASSESS VOCATIONAL SKILLS AND ABILITIES FOR ALL WORKING AGE PARTICIPANTS AND DOCUMENT THAT ALL PARTICIPANTS ARE INFORMED OF THEIR RIGHT TO APPEAL ANNUALLY.
 - *Discussion and assessment of vocational skills and abilities currently occurs at the initial assessment and the annual assessment with participants and/or their families. For those who choose to work, the opportunity to do so is supported via referral to DRS and/or through Waiver Vocational Services. Documentation of this will be included in the initial and annual assessment process.*
 - *The right to appeal information was addressed in the Corrective Action Plan Section of this document.*
2. DEVELOP AND USE VISIT SHEETS FOR CASE MANAGER FACE-TO-FACE VISITS WITH PARTICIPANTS, THEIR FAMILY OR PROVIDER STAFF.
 - *Either the use of a visit sheet or modification to forms already in use to ensure that the visit is documented and that participant satisfaction with services is addressed at each visit, will be utilized.*
3. OTTER TAIL COUNTY SHOULD UPDATE CARE PLAN FORMATS TO ENSURE THAT THE CARE PLAN IS A PERSON-CENTERED AND PARTICIPANT FRIENDLY DOCUMENT IN ADDITION TO INCLUDING REQUIRED INFORMATION.
 - *Otter Tail County will review all care plans currently being utilized for waiver services and determine which format would be the most person-centered and participant friendly, while meeting program requirements. An updated format is targeted to be in use by 1/1/2014.*

4. WORK WITH PROVIDERS AND NEIGHBORING COUNTIES TO DEVELOP SERVICES THAT SUPPORT PARTICIPANTS IN THEIR OWN HOMES AND REDUCE RELIANCE ON MORE EXPENSIVE RESIDENTIAL OR INSTITUTIONAL CARE.
 - *A Request for Information (RFI) is being developed to explore service delivery options such as a provider leasing an apartment within a complex and delivering services to participants in apartments within that building or nearby apartments or homes that are customized to the needs of the person. This concept would allow for ease of access to the provider staff should participant need assistance outside of their scheduled services. This RFI will be sent out to providers by the end of August 2013.*
 - *Otter Tail County will explore options for services, including assistive technology that would allow participants to reside in the most inclusive setting.*

5. CONTINUE TO EXPAND COMMUNITY-BASED EMPLOYMENT OPPORTUNITIES FOR PARTICIPANTS IN THE CCB AND DD PROGRAMS.
 - *Otter Tail County is working with a vocational provider to expand opportunities for community-based employment opportunities for waiver participants. The goal is to have all who choose community employment have jobs in the community.*

6. OTTER TAIL COUNTY HAS RESERVES IN THE CCB AND DD BUDGETS AND IS ABLE TO PROVIDE ADDITIONAL SERVICE TO PARTICIPANTS OF THESE PROGRAMS.
 - *Otter Tail County has worked with the Department of Human Services to secure an additional 10 CCB unfunded waiver slots. The county's allocation can support additional participants, but did not have enough waiver slots. Otter Tail County CCB Team is in the process of allocating those slots. In addition to this, the DD Waiver internal team is reviewing individuals in need of funding and has added an additional 3 participants and is in the process of adding 4-7 more through service optimization.*