

Frequently Asked Questions Regarding Support Coordination Monitoring:

1. Do Findings Levels increase in severity if a Review Element does not improve in the next monitoring?

Yes, if a Review Element finding was a Level 1 or Level 2 determination for the previous monitoring period and performance did not improve in a subsequent monitoring, it will advance one Determination Level from the actual finding. This process alerts both the SCA and the regional office that the improvement activities implemented in the previous year were either:

- a) Not effective or
- b) Not implemented soon enough to affect the next monitoring period.

This process alerts the SCA that a previous year's performance improvement activities were not fully effective. The SCA and regional office may then utilize this information to avoid detrimental delays when focused improvement activities are required early into a monitoring period. This active approach of Continuous Quality Improvement by the SC Agency is necessary in order to meet the CMS performance standards required of Medicaid Home and Community Based Service programs.

2. What are the consequences of Level 3 determinations? Will there be adverse actions taken against our agency?

The significance of a Level 3 determination is that it alerts the SC agency of a problem requiring rapid implementation of systemic improvement strategies in order to prevent adverse outcomes for participant(s). **The regional office should be contacted early and often** to assist you in determining effective strategies for improvement. Level 3 findings do not result in adverse actions against an agency anytime the agency works actively with their regional office to correct problems and implement agreed upon strategies for improvement.

Adverse actions will only be taken when there is repeated noncompliance and an absence of reasonable effort to collaborate with the regional office and implement systemic improvement. **Decisions regarding adverse actions against an agency can only be made at the state office level and require evidence of repeated noncompliance and noncooperation with regional and state office recommendations.**

3. What if the SCA just got few things wrong, such as a Notice of Findings, two years in a row, does this become a Level 1 finding?

No, a Notice of Findings is an acceptable finding which does not require a Corrective Action Strategy Plan. This finding only requires that the individual problems are resolved and documented in the participant's record and reported on the Progress Report.

4. What is required for individual remediation?

Individual remediation means that each individual finding of a "not met" review element has been resolved for the participant and that the resolution was documented in the participant's record. **Resolution of individual problems should begin as soon as the agency receives their findings.** The CASP column titled: *"Identified Issue/ Participant Identifier # and Individual (s) listed by initials"* is where the regional office lists all of the "un-met" review elements which require individual remediation. Agencies are required to resolve, document and report to the regional office how all individual were remediated within 90 days of the approved CASP. **Reporting to the regional office is done on the Progress Report column titled: "Status of individual solution(s) to the issues."** During the Follow-up Review the regional staff will ask for evidence in support of the individual remediation activities summarized on the Progress Report. Agencies with one or more Level 2 or Level 3 findings are required to participate in a Follow-up Review by the regional office.

This process is further outlined in the following documents:

- OAAS-PF-13-012 Corrective Action Strategy Plan/Progress Report
- OAAS-PF-13-011 Support Coordination Monitoring (SCM) Form Instructions
- OAAS-IF-13-009 Support Coordination Monitoring (SCM) Follow-up Reviews
- OAAS-PC-12-004 OAAS Guidelines for Scoring, Corrective Action and Follow-up Monitoring

5. What do you do if the person is no longer a participant with your SCA? Do you still need to correct? SCAs are having to fix expired POCs, fix records on clients who are deceased, no longer in their caseload, etc.

As stated in number four, agencies bear responsibility to resolve individual problems and document that resolution in the record. However, if a participant is no longer linked to the agency at the time findings are received, problem resolution is the responsibility of the current agency. If the participant is linked to the SCA during the period that the Progress Report applies there must be documentation of how a problem was resolved, e.g. a new SC Documentation entry which explains specifically how the problem was addressed, performance of new MDS if warranted, a revision to the POC, etc. In instances where a participant was still linked to the SCA after findings were received, absent or insufficient documentation may result in an un-approved Progress Report or Follow-up visit. Simply stating that the SC or supervisor “Noted” the problem is considered insufficient documentation.

6. Is there a simple “cheat sheet” that explains the Scoring Criteria for Waiver Reviews?

Yes, refer to the document titled Summary of Scoring Criteria for SCM Waiver Reviews.

7. Since SCAs were just given the updated IG’s, do we allow the SCA more time to update their policy and procedures prior to monitoring them?

ROs should not cite the SCA on an issue that was recently changed in the new IG. If ROs come across this issue, they need to do the following:

- Write a note stating that they need to correct this and when OAAS RO goes out to look at corrective action issues; RO will look at this too.