

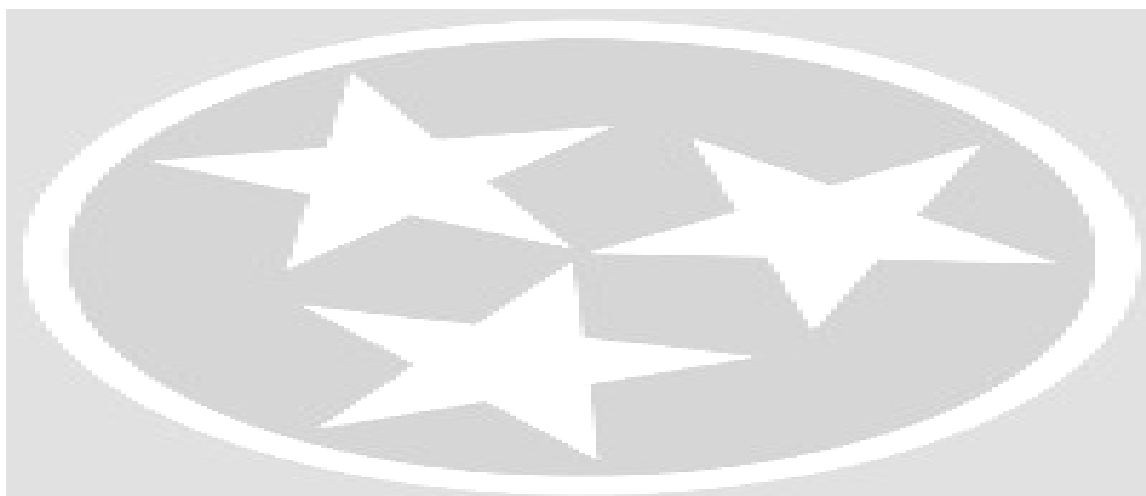
**Tennessee Commission on Aging & Disability  
Serving Tennesseans Since 1963**

HOME AND COMMUNITY BASED SERVICES PROGRAM  
REVIEW

FOR

**South Central Tennessee Area  
Agency on Aging and Disability**

815 Main Street  
Columbia, TN 38401-3307



*Tennessee Commission on Aging and Disability  
Statewide Home and Community Based Services Waiver  
Quality Assurance Unit*

## **Executive Summary:**

The South Central Area Agency on Aging and Disability (SCAAAD) operates under the auspices of the South Central Region Development District in Tennessee. SCAAAD is one of nine regional AAADs in the state. On December 16 and 17, 2008, the Tennessee Commission on Aging and Disability (TCAD) conducted an on-site quality assurance visit to evaluate the SCAAAD's administration of the HCBS waiver program in serving enrollees within their district. The review consisted of analysis of the administrative operations, adherence to personnel requirements, program management and regional quality assurance monitoring.

In the area of administration, policies and procedures were noted to be appropriate and applied to the program operations. The fiscal review did indicate some issues with invoice verification. The sample of invoices revealed ICF/SNF discrepancies, which occur when billing invoices are submitted during a time frame when enrollees were admitted an Intermediate Care Facility or Skilled Nursing Facility. Duplicate claims submitted for payment were also present.

The personnel who conduct in-home assessments were interviewed about timelines, policies and procedures related to waiver enrollment. The staff proved to be very knowledgeable and capable. A review of personnel files revealed that the appropriate on-line registries as well as references and employment checks had been completed for the employees reviewed.

A review of network adequacy verified that SCAAAD offers waiver enrollees a suitable choice of providers in all available services.

The Quality Assurance component of the AAAD is in compliance with all requirements. Enrollee satisfaction on service delivery was conducted through a survey process. The information gathered from the survey is shared with providers at quarterly meetings. Ongoing monitoring of the providers was done within expected timelines. Maintaining a process for tracking of Incident/Complaints, and submittal of reports to the State (TCAD and TennCare) continue to be timely.

There were many positive indicators for the growth and progress of the waiver program in the South Central region. Two (2) findings were reported requiring further action by the AAAD.

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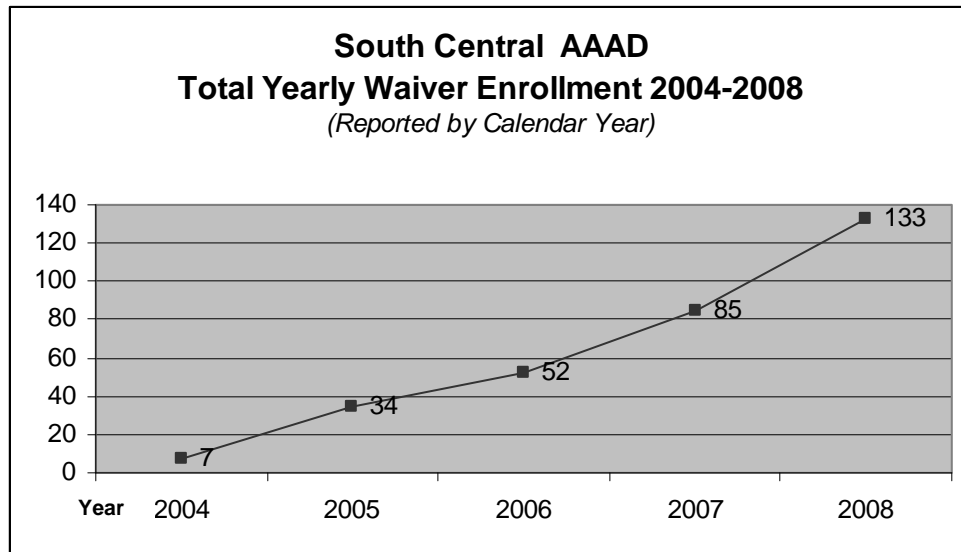
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## INTRODUCTION

The statewide Home and Community Based Services (HCBS) Waiver was approved by the Centers for Medicare and Medicaid Services to serve elderly and disabled individuals. This Waiver is intended to provide a community-based, cost-effective alternative to institutional nursing facility care for eligible individuals. The Commission on Aging and Disability serves as the Administrative Operating Agency (AOA) for the Waiver, which is administered under the supervision of the Tennessee Department of Finance and Administration, Bureau of TennCare.

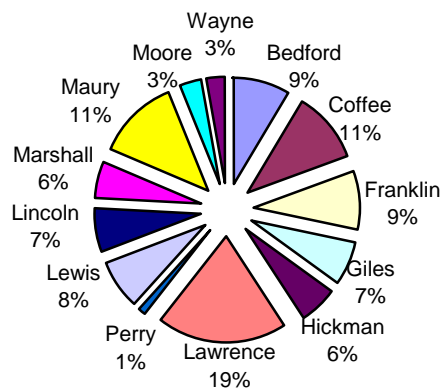
South Central Tennessee Development District is one of nine Tennessee Regional Offices on Aging and Disability. Their service area includes the following counties: Bedford, Coffee, Franklin, Giles, Hickman, Lawrence, Lewis, Lincoln, Marshall, Maury, Moore, Perry and Wayne. The organization signed a contract to participate in the waiver program in 2004. Since that time, SCAAAD has continued to see steady increase in its annual enrollment of applicants to the program. See the illustration below:



The agency's marketing plan, recruitment efforts and outreach projects within the local communities have served to promote the waiver program as an attractive alternative to nursing home care.

As of March 10, 2009, South Central has used 227 waiver slots. This represents five (5.0) percent of the total slots used statewide. Enrollment is exhibited in all counties in the South Central district. Demographic data for active enrollment is shown in the following chart for current active enrollees as of 1/27/09.

**SOUTH CENTRAL AAAD**  
**Percentage of Active Enrollment by County**  
*(January 27, 2009)*



The Annual on-site Assessment and Review of South Central Tennessee District Area Agency on Aging and Disability was conducted on December 16 and 17, 2008 by Dorothy Marks and Darla Bennings, Quality Assurance Coordinators with the Tennessee Commission on Aging and Disability (TCAD). The review period is Federal Fiscal Year 2008 (October 1, 2007 to September 30, 2008) to the present. The purpose of the review was to:

- Monitor the plan of care for persons receiving waiver services by reviewing a sample plan of care for individuals enrolled in the statewide HCBS program;
- Determine if the agency's records and services provided are supported by appropriate program and fiscal documentation; and
- Verify that the agency is in compliance with applicable statutes, regulations and policies.

The previous site review occurred May 28-30, 2008. The following was noted to be of concern:

1. South Central did not have a sufficient number of providers to offer enrollee choice for the following services: Adult Day Care, Assisted Living Facility, Institutional Respite and Pest Control.

The specific areas of review for the current annual assessment were: Administration, Personnel, Program, and Quality Assurance. Four monitoring tools were used during the review process.

- The Home and Community Based Services (HCBS) Checklist for Enrollee Waiver File
- HCBS Waiver Provider Employee Qualification/Verification Tool Sheet.
- The AAAD Intake and Enrollment Function
- AAAD-Waiver Function forms.

This review was conducted under the authority of the February 2004 *TennCare Statewide Home & Community Based Services Waiver for Elderly and Disabled Provider Manual*, the Bureau of TennCare provider agreement(s) in effect with the agency, and the Rulemaking Hearing Rules of Tennessee Department of Finance and Administration Bureau of TennCare Chapters 1200-13-1 and 1200-13-1-.21.

## **ADMINISTRATION**

Administrative procedures are contractually identified and include but are not limited to:

1. Business Capacity (generally including a review for solvency and verification that the agency is suitable to participate in state or federally-funded programs.
2. Administrative reporting (generally including the following: TennCare annual report, independent audit, TCAD quarterly reports and other required TCAD documents);
3. Waiver provisions (generally including the following: service restricted to AAAD, appropriate policy and procedure, appropriate marketing materials, and methodology to assure quality service);
4. Record management (generally including the following: records available for inspection, retention criteria, procedure to release enrollee records, and provision for records after discontinuing as a waiver provider );
5. Title VI; and
6. HIPAA provisions.

### Observations:

1. Title VI posters were located in the reception area of the main office.
2. The AAAD uses the Bureau of TennCare approved printed material explaining the waiver program and acknowledging the State of Tennessee as the funding source.
3. The agency meets HIPAA requirements for confidentiality related to maintenance of enrollee records.

4. Agency viability was confirmed using the U.S. Department of Health and Human Services, Office of Inspector General's, List of Excluded Individuals/Entities (LEIE) database to determine the agency has not been excluded from participation in Medicare, Medicaid or any other Federal health care program. There were no negative results noted. Other indicators of business capability (including the following areas: debarment or suspension from federal transactions, terminations of public transactions, filing or history of bankruptcy) were also reviewed with no findings.

### **Fiscal Review:**

The financial evaluation was performed by Mark Hanna, the TCAD auditor who has conducted the fiscal review for all the AAADs for four years. This assessment consisted of an interview with Gloria Bennett, the Fiscal Specialist for SCAAAD. All the agency programs were scrutinized by examining the Quarterly Revenue and Expense Reports, Inventory, Supplies Record and General Ledger for the year ending June 30, 2008. There were no discrepancies noted in the documentation provided for the review period.

A sample of waiver invoices – nine (9) Intermediate Care Facility/Skilled Nursing Facility (ICF/SNF) discrepancies, 15 that were identified as duplicates, and 58 home MODs, were reviewed along with the supporting documentation.

### **Observations:**

1. Of the nine (9) ICF/SNF discrepancies reviewed, two (2) enrollees were found to have conflicting information related to ICF/SNF admittance dates and case management service provision. For these two enrollees, claims had been submitted for case management services while the enrollee(s) were admitted to an Intermediate Care Facility or Skilled Nursing Facility. One of the bills was submitted for the time period of 8/1/08 to 8/31/08. The second was submitted for 11/1/08 to 11/4/08. Both claims were denied.
2. Review of the 15 duplicate payment sample, identified three (3) duplicate claim submissions for the same service for the same period for the same enrollee. One occurred for Pest Control in 6/08, another for Personal Care in 7/08 and the last was for Homemaker services in 8/08.

## PERSONNEL

The Personnel review consisted of evaluation of the policy and procedures; as well as, a review of the personnel records for two individuals hired since the last site visit in May of 2008. Megan Johnston is a part-time Waiver Case Manager performing in-home assessments for the waiver program. Rebecca May is a Waiver Fiscal Specialist responsible for data entry. The employee files were examined for documentation of criminal history, reference and background checks, appropriate education and experience, sexual offender registry and abuse registry checks.

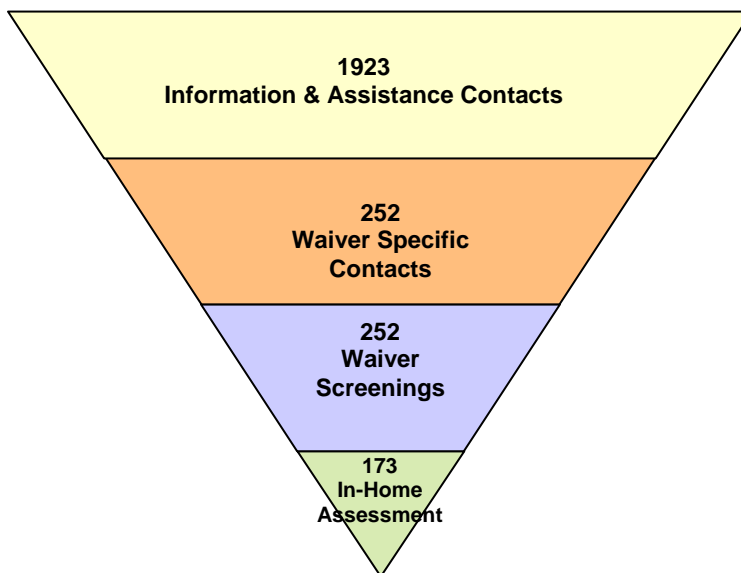
### Observations:

1. There was sufficient documentation to substantiate that all appropriate background checks and references were completed during the employment process of the newly hired staff.
2. The employee files were secured in a location with limited access to authorized personnel.

## PROGRAM

Waiver program activities for the review period saw an average monthly increase in enrollment of eight (8) enrollees per month. The graph below summarizes the activities of the AAAD concerning contacts and waiver enrollment.

### South Central AAAD Overview of Waiver Program Activity for FFY 2008



The AAAD met all the requirements for timeliness for the enrollment process. There was no waiting list of applicants to be screened or assessed at the time of the review. There were six (6) applicants for the waiver program denied during this period. The denials included four (4) by DHS, one (1) by TennCare (based on the PAE), and one (1) by the applicant's physician.

There were no enrollees reported to have had services delayed, reduced or terminated during this period.

There were two (2) involuntary disenrollments during the period. Both were found to be "too functional" for the program.

Adherence to program guidelines was assessed through reviews of the policy and procedures manual, enrollee case files and staff interviews.

A random sample of thirteen (13) case records from both the active and disenrolled individuals served in the HCBS waiver program was examined from the review period.

In addition, an interview was conducted with Jamie Canady, the waiver manager regarding program administration in the area, and the overall progress of the HCBS waiver program. In a separate interview, Megan Johnston displayed a growing knowledge of the enrollment process, policy, and in-home assessment of applicants.

#### Observations:

1. All of the sample case records were found to have an established format to organize documentation. Information within each record was appropriately identified on every page enclosed in the file.
2. Agency progress notes adequately detailed the enrollee's status.
3. The Physician's orders and revised plans of care for enrollees were consistent in the frequency and types of services being provided.
4. The waiver staff exhibit knowledge on the program and processing timelines. Various tools and processes have been implemented to ensure accuracy in the handling of each enrollee's case.

#### **Provider Network:**

A review of the provider services availability by county throughout the SCAAAD was performed based on the list of providers cited on the web for the district as well as through an interview with the waiver manager, Jamie Canady.

South Central meets the requirement of having at least two (2) providers of every service in each county. As such, at the time of the review, SCAAAD had a sufficient number of providers to offer enrollee choice throughout the district.

Detailed county-specific availability of all thirteen services are tracked and reviewed by the AAAD. The reported number of providers and total active enrollment is time-sensitive and changes continuously. The information below lists five specific service categories; Personal Care Attendant (PCA), Case Management (CM), Homemaker Services (HMK), Personal Care Services (PC) and Home Delivered Meals (HDM) . These services are reported below as ratios of providers to enrollees by county.

SOUTH CENTRAL AAAD COUNTIES	Network Adequacy*				
	<i>Ratio of Providers : Enrollee for Five Services</i>				
	PCA	CM	HMK	PC	HDM
Bedford	1:1	1:6	1:2	1:2	1:6
Coffee	1:2	1:7	1:2	1:2	1:7
Franklin	1:2	1:6	1:2	1:2	1:6
Giles	1:1	1:4	1:1	1:1	1:4
Hickman	1:1	1:4	1:1	1:1	1:4
Lawrence	1:3	1:13	1:3	1:3	1:13
Lewis	1:1	1:5	1:1	1:1	1:5
Lincoln	1:1	1:4	1:1	1:1	1:4
Marshall	1:1	1:4	1:1	1:1	1:4
Maury	1:2	1:6	1:2	1:2	1:6
Moore	1:1	1:2	1:1	1:1	1:2
Perry	1:1	1:1	1:1	1:1	1:1
Wayne	1:1	1:2	1:1	1:1	1:2

\*Excerpt taken from: "TCAD Quarterly Report on Network Adequacy Oct. – Dec. 2008"

#### Observations:

1. The five specific service categories were reported as ratios between the number enrollees and providers.
2. At the time of the review, SCAAAD had a sufficient number of waiver service providers for all counties in the district, which meets program requirements.

#### **Waiver Service Utilization:**

A more detailed account for all the services by county within the SCAAAD was also examined. Utilization of waiver services for SCAAAD was based on the 2008 fiscal year's invoices as recorded in the Service Accounting Management System (SAMS). The chart below shows the service utilization of the active population by service category for the 2008 fiscal year (July 1, 2007 through June 30, 2008)

SERVICES TYPE	1 <sup>st</sup> Qtr.	2 <sup>nd</sup> Qtr.	3 <sup>rd</sup> Qtr.	4 <sup>th</sup> Qtr.	Total
Adult Day Care	0	0	0	0	0
Assisted Care Living Facility	0	0	4	9	13
Assistive Technology	1	12	9	17	39
Home Delivered Meals	154	190	224	225	793
Homemaker	203	246	249	219	917
In-Home Respite	4	20	32	50	106
Institutional Respite	2	0	1	1	4
Minor Home Modifications	11	19	13	9	52
PERS – Installation	21	5	13	6	45
PERS – monthly	183	195	224	242	844
Personal Care Assistant	2	14	39	71	126
Personal Care Services	172	187	184	167	710
Pest Control	23	82	93	70	268
	776	970	1085	1086	3917

Observations:

1. The data shown above represents the total population upon enrollment for each quarter. It was not modified to reflect subsequent changes in the population based upon disenrollments.
2. Case management was not included in the data since it is a required service with one hundred percent (100%) participation by enrollees.
3. Two types of services (Adult Day Care and Assisted Living) were not used by any of the enrollees during the reporting period despite their availability within areas of the district.

**QUALITY ASSURANCE**

Adherence to quality assurance guidelines was assessed through reviews of the policy and procedures manual, incident/complaint log and staff interview. The results of the agency’s annual Enrollee Satisfaction Survey were also reviewed.

Observations:

1. A review of the Incident and Complaint logs verified that events were recorded appropriately and action was taken as needed.
2. SCAAAD conducts an annual Enrollee Satisfaction survey. During the review period, 125 Enrollee Satisfaction Surveys were distributed by mail, or conducted by phone. The survey return rate was reported to be approximately 66.4%, indicating a high level of participation by enrollees.
3. The results of the survey were shared with service providers. A copy of the consumer’s comments on their experience with services was also provided to providers during a quarterly meeting.

4. To date, South Central has completed 40% of all quarterly monitoring of providers active in their area. On-site monitoring had been completed on 9 (33%) of the providers.

## Findings Summary Requiring Further Action

### **ADMINISTRATION**

1. The AAADs invoice verification process should ensure there is no overlap between HCBS provision dates and enrollee ICF or SNF admittance dates.
2. The AAADs invoice verification process should ensure that duplicate invoicing is not submitted for payment. Unnecessary service payment denials result in excessive re-billing and may result in the provider not receiving proper payment for services rendered.

### **PERSONNEL**

No findings at this time.

### **PROGRAM**

No findings at this time.

### **QUALITY ASSURANCE**

No findings at this time.

## Corrective Action

This report is a draft. You have until April 17, 2009 to provide any additional information that you believe will impact the findings shown. If you have no additional information, the report is considered final April 17, 2009.

Once the report is final, it is the responsibility of the agency to provide a corrective action plan to any findings cited in the findings summary. Your corrective action plan should identify how you have corrected the specific instance of the cited finding and how your agency will prevent the issue from happening again. You have until May 17, 2009 to submit your corrective action plan to:

Michelle Drachler, Waiver Quality Assurance Supervisor  
Tennessee Commission on Aging and Disability  
Andrew Jackson Building  
500 Deaderick Street, Ste. 825  
Nashville, TN 37243-0860

Email: [michelle.dracher@state.tn.us](mailto:michelle.dracher@state.tn.us)

If you have any questions, please call 615-741-2056 x157. Thank you for your cooperation and your continued participation with the Statewide Home and Community Based Services Waiver program.