

Policy Transmittal Aging and People with Disabilities



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Number: APD-PT-19-022

Issue date: 8/26/2020

UPDATED

Topic: Long Term Care

Due date:

Transmitting (check the box that best applies):

- New policy
 Policy change
 Policy clarification
 Executive letter
 Administrative Rule
 Manual update
 Other:

Applies to (check all that apply):

- | | |
|--|---|
| <input type="checkbox"/> All DHS employees | <input type="checkbox"/> County Mental Health Directors |
| <input checked="" type="checkbox"/> Area Agencies on Aging: Type B | <input type="checkbox"/> Health Services |
| <input checked="" type="checkbox"/> Aging and People with Disabilities | <input type="checkbox"/> Office of Developmental Disabilities Services (ODDS) |
| <input type="checkbox"/> Self Sufficiency Programs | <input type="checkbox"/> ODDS Children’s Intensive In Home Services |
| <input type="checkbox"/> County DD program managers | <input type="checkbox"/> Stabilization and Crisis Unit (SACU) |
| <input type="checkbox"/> ODDS Children’s Residential Services | <input type="checkbox"/> Other (please specify): |
| <input type="checkbox"/> Child Welfare Programs | |

Policy/rule title:	Risk Assessment Mitigation & Monitoring Requirements for In-Home Consumers		
Policy/rule number(s):	APD-411-030-0050 (1) (2) (a-c)	Release number:	N/A
Effective date:	Upon release	Expiration date:	
References:			
Web address:	http://www.dhs.state.or.us/spd/tools/cm/Risk%20Assessment/In dex.htm		

Updates in red text are clarifications for existing policy.

In addition, a document entitled “Risk-Focused Templates” has been provided to help staff provide the appropriate documentation in the risk comments box and when narrating Risk Mitigation/Monitoring Direct Contacts. This resource is located on [CM tools](#).

Discussion/interpretation:

This transmittal clarifies ongoing program requirements for CA/PS Risk Assessments and appropriate risk mitigation/monitoring direct contacts for individuals receiving in-home services.

Implementation/transition instructions:

Risk Assessment:

As staff complete CA/PS assessments, they are also required to complete risk assessments for individuals receiving in-home services (this does not include services through State Plan Personal Care, PACE, and Oregon Project Independence) and select the level of risk in each risk category (except for Power Outage or Natural Disasters/Extreme Weather):

- **High Risk:** An identified concern, that without mitigation, is likely to cause the individual to experience substantial injury or loss within the next 30 days, or the individual has experienced substantial harm within the previous 30 days and the harm will likely reoccur without mitigation.
- **Medium Risk:** An identified concern, that without mitigation, is likely to cause the individual to experience minor injury or loss within the next 90 days or has experienced minor loss in the previous 30 days that will likely reoccur or worsen without mitigation.
- **Low Risk:** An identified concern, that without mitigation, may result in harm. The risk of harm to the individual is not imminent nor likely to occur within 90 days, and/or harm has occurred within the last 30 days, has been mitigated, and is unlikely to reoccur within 90 days.

If the individual is assessed as a high or medium risk in any category, the case manager must work with the individual to develop a mitigation plan to help reduce the assessed level of risk. The plan must be documented, including the individual's agreement to the plan, with any updates as needed. The individual may also choose to not participate in any mitigation plan, which also must be documented.

All risk assessments (even those with no high or medium risks identified) must document an agreed upon backup plan should a scheduled provider be suddenly unavailable. The backup plan must include the name and contact information of the backup individual, if applicable. Document if an individual chooses to not have a backup plan or is unable to come up with one.

Please note: The "Risk Assessment" Direct Contact will be automatically added into Oregon ACCESS when a new (not modified) risk assessment is completed.

This Direct Contact satisfies the monthly or quarterly risk contact when the Risk Assessment is completed as required (see below).

Example of Risk Assessment narration in risk comments box:

Ana recently experienced significant decline in physical functioning. It is very difficult for her to ambulate, prepare food, eat properly, or care for her hygiene needs. There is significant concern that her needs may result in injury and hospitalization in the next 30 days, as she does not have any identified natural supports or providers currently assisting her. This CM developed a plan with Ana (which she agreed to) that includes finding a HCW from the registry, having an emergency response system, and checking with her next door neighbors to see if they are willing to check in on her on a regular basis. Ana doesn't have a backup plan to meet her needs but is interested in working on one. This CM will make an Emergency Response System referral and check back in a week to see how Ana is doing with her plan.

Risk Mitigation and Monitoring:

- If the individual is assessed as having at least one high-risk, the individual will need a monthly risk-focused mitigation/monitoring direct contact for any risks that have been identified.
- Otherwise, the individual will need quarterly risk-focused mitigation/monitoring (direct contact) for any medium or low risks that have been identified.

As of August 1, 2019, staff were required to select the "Risk Mitigation/Monitoring" Direct Contact service in Oregon ACCESS to satisfy the risk direct contact requirement for all individuals receiving in-home services.

A Risk-Focused Mitigation/Monitoring Direct Contact must include the following actions from appropriate APD/AAA staff:

- Have a conversation with the individual to assess for new risks and to follow-up on previously assessed risk concerns, current mitigation plan (if one was required), and any other changes that might impact the individual's assessed risk needs. A consumer or caregiver indicating everything is "fine" or "going well" does not constitute a risk assessment.
- Determine if the individual's mitigation plan is being implemented (if one was required) to lower identified risk(s). Provide additional assistance as needed.
- Review the individual's current back-up plan to ensure that the information is still current. This must be reviewed and documented, even if there is no assessed high or medium risk identified.
- Update current information on the individual's risk concerns and mitigation/monitoring efforts in the risk assessment as needed (see below for

example).

- Provide case narration to indicate that a risk mitigation/monitoring direct contact is completed. A template, which may be found in the [Risk Assessment page in CM tools](#), is provided to help APD/AAA staff to meet the narration requirements.

Example of narration for Risk Mitigation/Monitoring in risk comments box (continued from previous example):

Ana has fallen several times inside her home over the past week. No significant injury was reported, but emergency services responded to treat minor leg strains and scrapes. This CM asked Ana to see if she has followed up with finding an HCW from the registry and talking to her neighbors about checking in on her. Ana reports that she is interviewing a potential HCW tomorrow. Ana's neighbor, Mary, at (503) XXX-XXXX, is willing to check on her if there is no HCW available. This CM has also completed the referral for an Emergency Response System, using Mary as the primary contact person. We also discussed the possibility of accessing a lift chair, which was also of interest to Ana. CM provided resources for Ana to contact to find a lift chair that may meet some of her needs. CM plans to reach out to Ana again in the next month to check on her progress.

Report Updates

- As of August 1, 2019, the "CM Services Due and Coming Due" report lists individuals in need of a "Risk Mitigation/Monitoring" Direct Contact by displaying the word "risk" under the "CM / Risk" column.
- A report labeled "Consumers with High Risk(s)" lists any individual who has been identified as having at least one high risk (except for the categories of power outages and natural disasters).
- If an individual is assessed as high-risk in the power outages or natural disasters/extreme weather categories, this information is carried over to the "CA/PS 2 Emergency Concerns" Report. Individuals with these high-risks are not required to have monthly risk-focused direct contacts. However, their risk concerns should be recorded in the Risk Mitigation Comment Box and pertinent information included as part of their Back-up Plan.

Risk assessments for individuals receiving services in a CBC or NF setting:

- Document in the Risk Mitigation Comments Box with a comment like the following: "The facility is responsible for mitigating risk". APD/AAA staff may choose to complete a risk assessment; however, it is not required. If a risk assessment is completed and one or more high risks are selected, the individual will be on the "Consumers with High Risk(s)" report. APD/AAA staff should discuss with facility staff any identified risk concerns that are not being addressed adequately.

Training/communication plan:

Staff that need to be aware of ongoing risk-focused mitigation/monitoring direct contact requirements should complete the following training in iLearn: [DHS - APD - Assessing Risk for In-Home Consumers](#). Additional information is also available on [CM Tools](#).

Local/branch action required: Ensure staff who conduct risk-focused mitigation/monitoring direct contacts with in-home consumers carefully follow the procedures outlined above and in the iLearn training module.

Central office action required: Provide ongoing support and assistance.

Field/stakeholder review: Yes No

If yes, reviewed by: Policy and Operations

Filing instructions:

If you have any questions about this policy, contact:

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