Procedures for Risk Assessments, Mitigation, Monitoring and Documentation

Definitions of Risk Levels Used in Risk Assessments

A. <u>High Risk</u> -- 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 recur without mitigation.

   Substantial injury or loss means: Urgent medical (hospital, Emergency room, Dr. office) intervention necessary to treat the injury or prevent significant health deterioration or loss of functioning, and/or, law enforcement involvement, loss of housing or financial loss exceeding $2,000.

B. <u>Medium Risk</u> -- 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 recur or worsen without mitigation.

   Minor injury or loss means: Medical intervention is not needed (natural supports, home remedy/over the counter, or time heals), housing is secure, and/or financial losses would be $2,000 or less.

C. <u>Low Risk</u> -- 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 recur within 90 days.

   Harm means: Injury or loss of any severity.

D. <u>No Risk</u> -- There are no identified concerns and no harm is likely to occur within 90 days, and there has been no harm in the previous 30 days.

Overview of Expectations for Case Managers in Risk Management for In-Home Consumers

A. Use the CA/PS Risk Assessment Tool in Oregon ACCESS in the Client Details section to identify potential risks during the in-home assessment process for all consumers receiving waivered in-home services. For each identified risk, assess the consumer's risk level by using the high, medium, low and no risk definitions.

B. Create a person-centered risk mitigation plan <u>with</u> the consumer to identify mitigation strategies to lower all identified high, medium, or low risks. Choose at least one action item from the "Risk Reducing Factor" column for each risk category. Mitigation strategies for high and medium-risk consumers may include multiple options from this column for some risk categories.

Note: To update an existing risk assessment, click "Modify" to add new information. Previous documentation will not be deleted but will remain in the system for historical record.

C. 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 and include any updates as needed. The individual may also choose to not participate in any mitigation plan, which also must be documented.

D. Determine if the individual's mitigation plan is being implemented (if one was required) to lower identified risk(s). Provide additional assistance as needed.

E. 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(s), if applicable. Document if an individual chooses to not have a backup plan or is unable to come up with one.

F. Provide a brief comment for all high and medium-risks identified and include the following in the Plan Mitigation Comment Box:
    1. A brief description of identified High and Medium-Risks.
    2. Details of the mitigation strategies being implemented to lower these risks.
    3. The consumer's understanding of the plan.
    4. Name and contact information of consumer's supports in the mitigation plan if applicable.
    5. Document a Backup Plan if the existing paid supports or assistive devices are suddenly unavailable (include names, contact information, specific ways support will be given).

G. Monitor the Risk Mitigation Plan to determine the effectiveness of the strategies used. Modify and adjust risk mitigation strategies as needed and to support the risk-lowering efforts of the consumer. The frequency of direct contacts is determined by the number and level of risks identified. Update current information on the individual's risk concerns and mitigation/monitoring efforts in the risk assessment as needed

H. 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.

I. Revise the service plan as necessary. When an identified risk level changes or a new risk is identified, modify the risk assessment information on the Risk Assessment Tool page and record changes and update narration in the Plan Mitigation Comments Box. Continue to monitor and revise the service plan over time for effectiveness.

Case Management Risk Monitoring Requirements

- **1 or More High-Risk** = Risk-Focused Monthly Direct Contacts. The consumer's high-risk concerns and mitigation strategies must be discussed with the consumer during

monthly direct contacts. Risk-focused direct contact requirements are indicated on the *CM Services Due Report*.

- **No High-Risk** = Risk-Focused Quarterly Direct Contacts. In-home consumers not assessed with any high-risk concerns must also receive a *risk-focused direct contact* at least once a quarter. These direct contacts should include ongoing risk monitoring for changes in the consumer's current risk assessment. This includes consumers with no identified risks on their current risk assessment.

During a Risk Mitigation/ Monitoring' Direct Contact Service

A. Have a conversation with the consumer to assess for new risks (and any other changes that might impact the individual's assessed risk needs), and follow-up on previously assessed risk concerns and review their effectiveness of their current mitigation plan and

B. Is the plan being implemented and identified risk(s) lowered?

C. What additional support or resources could be accessed to lessen risks and support the mitigation efforts of the consumer?

D. 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.

E. Offer additional support and risk-lowering strategies.
Note: A consumer or caregiver indicating everything is "fine" or "going well" does not constitute a required risk assessment contact.

The diagram below displays the ongoing process involved in providing Person-Centered Service through Risk Mitigation and Monitoring

The Risk Assessment Tool of the CA/PS Client Details and Oregon ACCESS System Notifications

Case managers are strongly encouraged to enter identified Risks, Risk Reducing Factors, and narration related to Risk Mitigation Strategies directly in the Risk Assessment Tool page of the Client Details section of CA/PS. The following reports guide field staff in the risk mitigation and monitoring process:

- The ***CM Services Due Report*** indicates if a direct contact is needed during the month and if the contact is needed for risk monitoring/mitigation purposes. On the report, the column <u>CM/Risk</u> shows "CM" if the required contact addresses other service plan needs. The column shows the word "Risk" if a consumer is assessed as high-risk and a risk-focused direct contact is needed for risk mitigation purposes, or the person does not have a high risk need but has not had a risk monitoring contact during the quarter. The risk-focused requirement will not come off this report unless the service activity entered is "Risk Assessment/Monitoring".
- The ***Consumers Identified with High Risk(s) Report*** is located in the *Report Description* list (after the CM Services Due report and before the Copy and Create Management Reports tab in Oregon ACCESS). This report identifies consumers with high-risks in one or more risk categories of a completed Risk Assessment.

The CA/PS System Required Order for Service Planning

A consumer's assessment for in-home CA/PS service benefit types includes the SPL (Title XIX) Assessment, Client Details information and the required Risk Assessment and the consumer's Service Plan. This order is important as the CA/PS Risk Assessment must link to the most current CA/PS SPL Assessment. The graphic below outlines the required assessment order in CA/PS:

First Step: SPL Assessment → Second Step: Risk Assessment in Client Details → Third Step: Consumer's Service Plan

The *CA/PS 2 Emergency Concerns Report*

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.

- The Power Outage and/or Natural Disaster/Extreme Weather risk categories are carried over to the *CA/PS 2 Emergency Concerns Report if they are identified as high-risk concerns* on the Risk Assessment Tool. No other risk factors are carried over to this report.

- If a high-risk level is selected for either of these categories, it is important to clearly document in narration or in the Plan Mitigation Comments what preparations are in place for the high-risk consumer in the event of a power outage and/or natural disaster/extreme weather.
- The Plan Mitigation Comments must reference a consumer's Back-up Plan that describes what the emergency plan is, who will be assisting the individual, their contact information, and how that assistance will be provided. If no Back-up Plan is in place, define what assistance the Department will need to provide and how that assistance will be delivered.

CBC and Nursing Facility Risk Assessment Requirements

If a case manager identifies a high-risk concern for a consumer in CBC setting and choses to capture this in the Risk Assessment Tool, these consumers will appear on the _Consumers with High Risk(s) Report_, however, only the service type "CM" will show on the _CM Services Due Report_.

- It is the CBC and nursing facilities' responsibility to ensure that consumers residing in these facilities have a risk management and a contingency plan in the event of an emergency.
- The case manager can select one of the two options for documenting the facility's responsibility to mitigate consumer risk:
  A. One entry can be documented in the Plan/Comments section of the CA/PS Risk section explaining that the client resides in the facility and it is the facility's responsibility for mitigating risks and to provide a contingency plan in the event of an emergency (#2 is the simplest and fastest way to document this).
     _Or_
  B. For each Risk Factor in the CA/PS Risk section, select the Risk Level and the Risk Reducing Factor of "Facility Responsibility"
- 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._

Examples of Risk Mitigation and Monitoring

- The consumer is struggling to pay the rent and may be facing eviction soon. The CM provided low-income housing resources and community resources for the consumer to follow-up on. CM encourages the consumer to contact ADRC to learn about potential resources in their community. CM provides risk mitigation/monitoring with the consumer to see if they checked in with the resources previously identified or if they need additional assistance.
- The consumer lives in a home with several structural concerns, however the consumer specifically said that he does not want to leave the home. CM provides risk monitoring by reviewing the concerns previously noted and continues to see if the consumer still wishes to stay in their home or if he wants help to find a new place to live. CM

encourages the consumer to contact the ADRC to investigate what support and resources are available. CM provides list of community-based resources that could assist with needed home repairs.

- No specific risks have been identified in the risk assessment; however, a back-up plan has not been identified. CM provides risk monitoring by talking with the consumer about who would be the best individual to contact if their current supports are suddenly unavailable. The CM records the name of the individual, their contact information, and ways they can provide assistance in the *Plan Mitigation Comment Box*.
- The consumer sits in a recliner most of the time, however she is unable to transfer out of it to use the bathroom. The CM looks at helping the consumer with getting a lift chair and an Emergency Response System set up through the K State Plan and suggests changing the HCW's schedule to provide better availability when assistance is needed. CM provides risk mitigation/monitoring by seeing how the new lift chair is working out, if an ERS is in place, and if she was successful in changing the HCW schedule. CM asks consumer if she would be interested in being referred to the Employer Resource Connection (ERC).

Additional Risk Assessment Resources on CM Tools Page

- Risk Level Definitions
- Risk-Focused Templates
- Risk Assessment FAQs
- Policy Transmittal: Risk Assessment Mitigation & Monitoring Requirements for In-Home Consumers (APD-PT-19-022)
- Workday Learning (Assessing Risk for In-Home Consumers)
- Risk Assessment Worksheet and Guidelines document ("Paper Tool").
- CM Webinars: Risk Assessments & IBL Limitations; EWE and Risk Assessment Changes.