



State of California—Health and Human Services Agency
Department of Health Care Services



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GOVERNOR

DATE: July 13, 2015 CCT PL: #15-006
TO: California Community Transitions (CCT) Program Director
SUBJECT: CCT Monthly Event/Issue Reporting Requirements

POLICY EFFECTIVE ON: 8/1/15

PURPOSE

The purpose of this Policy Letter is to provide CCT Lead Organizations (LOs) with an overview of the CCT Monthly Event/Issue Reporting requirements, and directions on submitting the Monthly Event/Issue Report form.

BACKGROUND

CMS requires every state Money Follows the Person (MFP) Grantee (CCT in California) to provide semi-annual performance reports in July and January. One component of the semi-annual report requires states to include categorical data on reportable events/issues that occurred within the six-month reporting period. DHCS CCT staff (DHCS) compiles the report data for the semi-annual report from information LOs submit in the *Monthly Event/Issue Report* forms. The data included in the *Monthly Event/Issue Report* is also used to extend Participants' Demonstration periods when the 365-day period is interrupted by events/issues that take them out of the community for fewer than 30 days. For both of these reasons, consistent and accurate LO reporting is crucial.

Over time, DHCS has noticed a substantial decrease in the number of *Monthly Event/Issue Report* forms being submitted to the CCT inbox. Recently, DHCS has also noticed that many LOs are not submitting the *Monthly Event/Issue Reports* in a timely manner, or in some cases not at all. As a result, there is considerable concern about

the dependability of the data DHCS uses to complete the federally-required semi-annual reports.

The *Monthly Event/Issue Report* form was revised to reduce the reporting burden on CCT LOs, and is currently posted on the CCT webpage as an electronically-fillable .pdf. Before this revision, LOs were required to submit 2 separate reports that were many pages longer for each incident: an initial report, and a follow up report. To reduce the reporting burden, yet still provide the federal government with reliable data, DHCS created a routine reporting schedule and user-friendly report form to reduce LO daily workload. The new reporting schedule does not eliminate the responsibility to record events as they occur, it simply reduces the number of emails LOs are required to submit to DHCS on a daily basis.

The *Monthly Event/Issue Report* requires CCT LOs to maintain a higher-level of post-transition contact with their CCT Participants living in the community. To encourage continuous post-transition follow-up, CCT LOs may submit a TAR for 50 hours of follow-up Transitional Case Management, as indicated in the *Revised CCT Transition Process* table attached to this Policy Letter, and available on the CCT webpage: <http://www.dhcs.ca.gov/services/ltc/Documents/RevisedCCTTransitionProcess.pdf>. Reimbursement for post-transition follow-up Transitional Case Management, is to provide CCT LOs with the funding necessary to monitor and fine-tune transition and care plans to ensure each plan continues to meet the needs of the participant. Providing 50 hours of follow-up Transitional Case Management within the 365 days following transition to the community is also to reimburse CCT LOs for continuously monitoring for, and reporting on, event/issues that may threaten the health and safety of the beneficiaries living in the community.

DHCS believes the new *Monthly Event/Issue Report* will increase the reliability of the data within the central CCT database, thereby improving the quality of data submitted to CMS for reporting purposes, and help facilitate regular follow up with CCT Participants living in the community.

GUIDANCE

Beginning with events/issues that occur in the month of August, CCT LOs shall use the new *Monthly Event/Issue Report* form available on the CCT webpage: <http://www.dhcs.ca.gov/services/ltc/Documents/CCTMonthlyEvent6-24-15.pdf>, as necessary.

When to Report

The *Monthly Event/Issue Report* form is due on the 5th of the month **following** the reportable month (e.g. the report for August is due September 5th). If the 5th falls on a weekend or holiday, the report must be submitted on the next business day.

What to Report

CMS requires states to watch for, and report on, each of the following types of events/issues.

1. Abuse (all forms)
2. Neglect
3. Exploitation
4. Hospitalization
5. Emergency Room Visits
6. Health-related Death
7. Death determined to be because of abuse, neglect, or exploitation
8. Death in which a breakdown in the 24-hour backup system was a contributing factor
9. Involvement with the criminal justice system
10. Medication administration errors

Reporting Requirements

- Because the *Monthly Event/Issue Report* form will contain personal identification information / personal health information (PII/PHI), they **must** be submitted via e-mail as secure, encrypted .pdf attachments.
- The same form that was originally submitted to DHCS to report the initial event/issue should be used to provide additional follow-up information when it is gathered (it is recommended LOs maintain electronic copies of the initial *Monthly Event/Issue Reports* for this purpose).
 - It is critical for DHCS to know when a Participant returns to the community after a short-term hospitalization, so their Demonstration period can be extended by the same number of days.

PROCESS

1. CCT LOs shall provide on-going follow-up services to all CCT Participants for the duration of the 365-day Demonstration period as indicated in the *Revised CCT Transition Process* table attached to this Policy Letter.

PLEASE NOTE: Within the 365 days following transition to the community, CCT LOs are able to bill for up to 50 hours of follow-up Transitional Case Management. Reimbursement for follow-up Transitional Case Management is to reimburse CCT LOs for ensuring the transition and care plans continue to meet the needs of the participants, and to continuously monitor for, and report on, event/issues that may threaten the health and safety of the beneficiaries.

2. When events/issues occur in the community within the 365-day Demonstration period, CCT LOs shall:
 - a. Ensure/confirm that the CCT Participant is safe.
 - b. Report the event/issue to the appropriate authority(ies), if necessary.
 - c. Document the occurrence.
 - d. Report all events/issues using the *CCT Monthly Event/Issue Report* form attached to this PL, and on the CCT website. Internal tracking systems are highly recommended.
3. Submit all *Monthly Event/Issue Report* forms, via secure and encrypted e-mail to the CCT inbox on the 5th of the following reportable month. If no event/issues occur within a reportable month, LOs must submit an email that states, “*No reportable events/issues this month,*” on the 5th of the following month.

QUESTIONS

If you have any questions about this Policy Letter, please contact the CCT project director, Karli Holkko, at (916) 322-5253 or by email at karli.holkko@dhcs.ca.gov.

Sincerely,

(Original signed by)

Rebecca Schupp, Acting Chief
Long-Term Care Division

Enclosures: *CCT Monthly Event/Issue Report* form
Revised CCT Transition Process table