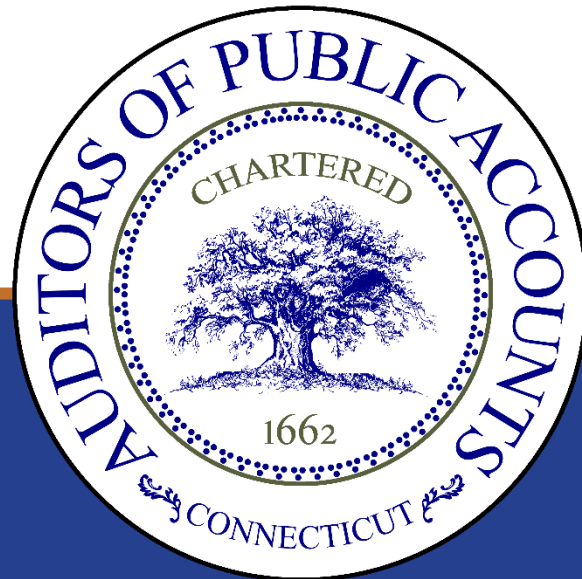


# AUDITORS' REPORT

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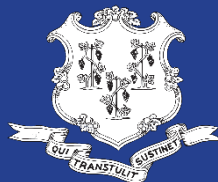
## FY 24 PERFORMANCE AUDIT COMPLIANCE REPORT

### **Department of Social Services: Community First Choice (Follow-up Report)**



**STATE OF CONNECTICUT**  
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# INTRODUCTION

## Background

Our office published the [Department of Social Services \(DSS\): Community First Choice \(CFC\) performance audit](#) on June 1, 2022.

The purpose of that audit was to assess the Department of Social Services' operation and oversight of [Community First Choice](#), a Medicaid State Plan service. We focused on the timeliness of the application and enrollment process; controls in place to ensure the care is provided prior to payment; process to train and assist participants in self-directing their care; role of the fiscal intermediary in overseeing the financial aspects of the process; and adequacy of DSS' management of the fiscal intermediary and access agencies.

Community First Choice allows eligible individuals to self-direct access to a personal care assistant (PCA) and other services and supports. DSS contracts with four access agencies in the state to conduct client assessments, develop personalized care plans, perform annual reassessments, and work with a fiscal intermediary to provide employer assistance and budget management support to clients.

There were 3,952 Community First Choice clients in fiscal year 2020 compared to 1,683 in fiscal year 2016 (134% increase). Total expenditures were \$125,192,539 in fiscal year 2020 up from \$36,419,833 in fiscal year 2016 (243% increase).

## Follow Up

On August 18, 2023, we requested an update from the Department of Social Services on how it addressed the report's 16 recommendations.

The report's recommendations focused on integrating the Strategy and Operations units' data systems, creating a better system to identify clients struggling with self-direction, tracking and reporting of historical assessment dates and technical assistance calls, developing a method to easily identify the types and timeliness of critical incident report submissions for Community First Choice clients, enhancing data systems and tracking of the CFC application and enrollment process, increasing CFC data integrity, ensuring contracts contain adequate performance measures, and improving fraud investigations and improper payment collections.

## Highlighted Agency Accomplishments

Since the release of the audit, the Department of Social Services has taken steps to improve the exchange of information between the Strategy and Operations Units' data systems while working towards the long-term goal of fully integrating the two systems. DSS is ensuring Community First Choice staff have access to the two data systems, added a CFC button to the Operations Unit data system, and continues to onboard new support staff. DSS notes it has faced competing priorities, including the public health emergency and staffing changes, in the period since the audit, but continues to work towards implementing the audit recommendations.

The Department of Social Services appears to have partially or fully implemented 31% of our audit recommendations. This information is solely based upon the department's responses to our update request and may be verified during our next departmental audit.

# AGENCY UPDATES

## Finding Area 1

### The Department of Social Services' Bifurcated Organizational Structure to Oversee Community First Choice is Inefficient

#### Recommendation 1

The Department of Social Services should integrate the two data systems and improve its organizational structure so that the Community Options - Strategy Unit has access to all information about waiver clients who also receive Community First Choice services. At a minimum, when the Community Options - Operations Unit receives a report of a critical incident, it should make all information readily available to the Strategy Unit. The Strategy Unit should be fully informed about all CFC clients experiencing a critical incident and should be able to obtain a complete description of all CFC client critical incidents in the aggregate.

#### Status

**PARTIALLY IMPLEMENTED**

The Department of Social Services has not integrated the Strategy and Operations units' data systems. However, DSS provided Community First Choice support staff access to both systems. The Operation Unit's database added a CFC button to identify and query CFC members with waivers. These units now have a shared critical incident tracking spreadsheet. The DSS response to Recommendation 5 notes the CFC Quality Management team has aggregated critical incident information for all CFC clients.

#### DSS Update

"The Department continues to work towards these recommendations. The long-term goal is to fully integrate systems through the use of CT METS (CT Medicaid Enterprise Technology System). The Community Options team continues to make progress in this area through attending design meetings with the CT METs team.

In the interim, the Department outlined short-term goals (listed above). The Department has faced competing priorities, including the Public Health Emergency (PHE), and staffing changes that have delayed some of these activities, though the Department continues to work towards these changes.

The CFC program staff support is onboarding new staff members who will work on CFC by providing primary source information and other resources, as well as ensuring staff have dual access to the MyCommunityChoices and Ascend databases. The Department has added a "CFC button" in Ascend to easily identify and query on CFC members. The Strategy Group is working alongside Operations related to the tracking and oversight of all CFC critical incidents. A shared tracking spreadsheet has been created to track all CFC critical incidents which includes the incident and outcome. The Strategy Group is further tracking all incidents of CFC participants through Abuse/Neglect/Exploitation reports to ensure timely standards of response."

### **Auditor's Note**

The short-term goals referenced by DSS here and throughout its current responses were provided by the department as part of its response to the original audit. The department stated, at the time, that it "anticipates that the following business processes will be fully implemented by February 1, 2022:

- Creation of a management workflow for Community First Choice which identifies clear roles and responsibilities;
- Changes to the Ascend system to clearly identify waiver participants that are using CFC self-directed services;
- Provide access to both My Community Choices and Ascend systems for Community Options Strategy and Operations staff to support their work;
- Establish a separate CFC report in Ascend for faster access to CFC identified members; and
- Establish a single system as a primary source for Community First Choice applications and records."

## **Finding Area 2**

### **Some Department of Social Services' Clients who Only Receive Community First Choice Services may Struggle with Self-Direction**

#### **Recommendation 2**

The Department of Social Services should develop a better system to identify clients who may be struggling with self-direction, including a method to identify and quantify the total number of clients who have received technical assistance calls.

#### **Recommendation 3**

The Department of Social Services should formally assess the adequacy and availability of the Support and Planning Coach service

to assist Community First Choice clients who may have difficulties with managing their care.

#### **Recommendation 4**

The Department of Social Services should consider offering quarterly case management services, as an alternative to the Support and Planning Coach services, for CFC-only clients having difficulty self-directing their care. The Department of Social Services can base these services on a minimum number of repeat technical assistant calls from an access agency within a specific period (e.g., 3-month period).

#### **Status**

### **PARTIALLY IMPLEMENTED**

The Department of Social Services developed a method to track technical assistance (TA) requests, including the use of spreadsheets. The access agencies submit their data to Quality Management, and the Operations Unit tracks their technical assistance calls. However, DSS did not use call data to identify clients who may be struggling with self-direction.

While DSS continues its work to expand the use of support and planning coaches, it has not formally addressed our recommendation to assess the adequacy and availability of this service. DSS also has not considered offering quarterly case management services to CFC-only clients.

#### **DSS Update**

“The Department continues to work towards these recommendations. The long-term goal is to fully integrate systems using CT METS. The Community Options team continues to make progress in this area by attending design meetings with the CT METS team.

In the interim, the Department outlined short-term goals (listed above).<sup>1</sup> The Department has faced competing priorities, including the Public Health Emergency (PHE), and staffing changes, that have delayed some of these activities, though the Department continues to work towards these changes.

The Department continues to work with the Access Agencies and DSS staff to educate and track requests for Technical Assistance (TA). Tracking spreadsheets have been created. The access agencies have worked with their IT systems to pull TA request data from My Community Options. They are submitting clients’ requests for TAs, # of TAs requests and date of TA requests quarterly to Quality Management. Additionally, all Operations TA requests are currently pulled and tracked via their critical incidents in Ascend. DSS has worked with the Access Agencies to help ensure TA requests are integrated into their processes. Ascend has been updated to correctly identify and query information on CFC members. The

Quality Management team for CFC have the aggregate of TA requests from both My Community Choices and Ascend databases.

The Department continues to make advancements in the areas of enrollment and use of Support and Planning Coaches. DSS has expanded and continues to grow the provider network through forums, trainings, and simplified billing practices.”

### **Finding Area 3**

## **The Department of Social Services Lacked Certain Data that would Measure the Operational Performance of Community First Choice**

#### **Recommendation 5**

The Department of Social Services should develop the systems and capabilities to improve its tracking and reporting of historical assessment dates, technical assistance calls, and critical incident data for Community First Choice clients who are on a waiver. The department should also provide prompt responses to inquiries, even if those responses are limited.

#### **Status**

**PARTIALLY IMPLEMENTED**

The Department of Social Services improved its tracking of technical assistance calls and critical incident data for Community First Choice clients on a waiver. However, DSS did not address the tracking or reporting of historical assessment dates, or the recommendation to provide prompt responses to inquiries.

#### **DSS Update**

“The Department continues to work towards these recommendations. The long-term goal is to fully integrate systems using CT METS. The Community Options team continues to make progress in this area by attending design meetings with the CT METs team.

In the interim, the Department outlined short-term goals (listed above).<sup>1</sup> The Department has faced competing priorities, including the Public Health Emergency (PHE), and staffing changes, that have delayed some of these activities, though the Department continues to work towards these changes.

The Department has added a “CFC button” in Ascend to easily identify and query on CFC members and the Critical Incidents information. The CFC Quality Management team collects

information on Critical Incidents for CFC and has the aggregate of information from both Ascend and My Community Choices.

The CFC program staff support is onboarding new staff members who will work on CFC by providing primary source information and other resources, as well as ensuring staff have dual access to the MyCommunityChoices and Ascend databases.

The Department continues to work with the Access Agencies and DSS staff to educate and track Technical Assistance (TA) requests and has created tracking spreadsheets. DSS has worked with the Access Agencies to help ensure TA requests are integrated into their processes. Ascend has been updated to correctly identify and query information on CFC members, including TA requests. The Quality Management team for CFC has the aggregate of TA requests from both My Community Choices and Ascend databases.”

## **Finding Area 4**

# **The Department of Social Services Cannot Ensure the Timeliness or Verify the Results of all Critical Incident Investigations and Reporting**

### **Recommendation 6**

The Department of Social Services should develop a method to easily identify the types and timeliness of critical incident report submissions for any client receiving Community First Choice services. The department should amend its policy and practice to record all necessary details and dates of interest. In addition, the department should record the date its staff or other reporter became aware of the incident and calculate the timeliness of report submission from that date.

### **Status**

**NOT IMPLEMENTED**

While the Department of Social Services can better identify and query critical incident information for Community First Choice clients on a waiver, DSS has not developed a method to identify the types and timeliness of critical incident report submissions. DSS has not amended its policy and practice to record all necessary details and dates of interest. As a result, DSS cannot calculate the timeliness of submitted reports.

### **DSS Update**

“The Department continues to work towards these recommendations. The long-term goal is to fully integrate systems using CT METS. The Community Options team continues to make



progress in this area by attending design meetings with the CT METs team.

In the interim, the Department outlined short-term goals (listed above).<sup>1</sup> The Department has faced competing priorities, including the Public Health Emergency (PHE), and staffing changes, that have delayed some of these activities, though the Department continues to work towards these changes.

The Department has added a “CFC button” in Ascend to easily identify and query on CFC members and the Critical Incidents information. The CFC Quality Management team collects information on Critical Incidents for CFC and has the aggregate of information from both Ascend and My Community Choices.

The CFC program staff support is onboarding new staff members who will work on CFC by providing primary source information and other resources, as well as ensuring staff have dual access to the MyCommunityChoices and Ascend databases.”

## **Finding Area 5**

# The Department of Social Services needs to Improve its Performance Measures and Enrollment Tracking for Community First Choice

### **Recommendation 7**

The Department of Social Services should improve data systems and performance tracking of the Community First Choice application and enrollment process to ensure it maintains a performance standard for all elements, captures all essential data elements, and can retrieve appropriate data to obtain trends over time.

### **Recommendation 8**

The Department of Social Services should improve and assure integrity of the Community First Choice data maintained by the Department of Social Services and its contractors.

### **Recommendation 9**

The Department of Social Services should ensure contracts contain appropriate and complete performance measures for essential contractor tasks and include penalties for poor performance.

### **Recommendation 10**

The Department of Social Services should improve tracking of contractor call wait times and other call center performance measures, like call abandonment.

**Recommendation 11**

The Department of Social Services should improve its benchmark measure for payroll errors and ensure that contractors are meeting it.

**Recommendation 12**

The Department of Social Services should consider requiring its contractors to engage independent public accountants to perform third-party service provider reports (i.e., System and Organization Controls).

**Status**

**NOT IMPLEMENTED**

The Department of Social Services has not improved its Community First Choice application and enrollment data systems and performance tracking. DSS is negotiating a new fiscal intermediary contract and took these recommendations into consideration. However, the department did not indicate it implemented any of these recommendations.

**DSS Update**

“The Department continues to work towards these recommendations. DSS has been in negotiations for a new Fiscal Intermediary contract with an anticipated execution date in the 4th quarter 2023. The above recommendations were taken into consideration during this process.”

**Finding Area 6**

The Department of Social Services Lacks Complete Fraud Complaint and Investigations Data which Prevents a Comprehensive Assessment of the Department’s Performance

**Recommendation 13**

The Department of Social Services should ensure that the Office of Quality Assurance databases that track complaints of potential overpayments and fraud referrals are complete and accurate.

**Recommendation 14**

The Department of Social Services should develop policies and procedures on recoupment for overpayments involving self-directed personal care assistants.

**Recommendation 15**

The Department of Social Services should develop a recoupment tracking system to determine how much has been collected.

**Recommendation 16**

The Department of Social Services should consider developing a risk-based planning system for the Office of Quality Assurance to better identify and prioritize risks.

**Status**

**NOT IMPLEMENTED**

The Office of Quality Assurance is creating a web-based platform to track all complaints, referrals, and recoupments. It is not clear if this platform would improve the completeness and accuracy of its databases but will implement the recommendation to develop a recoupment tracking system. DSS has not developed overpayment recoupment policies and procedures for overpayments.

DSS stated complaints involving abuse and/or safety concerns take top priority. While this practice responds to complaints based on risk of harm to the client, it is not a risk-based planning system for fraud.

**DSS Update**

"The Department continues to work towards these recommendations. The Community Options CFC Quality Management (QM) team continues to work collaboratively with the Office of Quality Assurance (OQA) and Fraud Investigation Regional offices to track CFC fraud cases from referral through investigation outcomes. In addition, OQA is working with a vendor to create a web-based platform that will enable the tracking of all complaints, referrals, and recoupments. The majority of fraud cases are received through Allied related reports that are emailed directly to the CFC unit and OQA. These reports are expected to continue with the new FI (Fiscal Intermediary) contract. The CFC QM team manages a spreadsheet to track all alleged fraud. The tracker includes: PCA and/or EOR name, date of referral, outcome of investigation and DSS action taken. FY 2022- present.

PCA cases which involve allegations of abuse and/or safety concerns take top priority. If a complaint involving abuse and/or safety concerns is received, the Quality Assurance Special Investigations Division will screen the case and consult with the Medicaid Fraud Control Unit (MFCU) with the Office of the Chief State's Attorney. If MFCU notifies the Special Investigations Division that they will accept the case, the case will then be assigned to a Forensic Fraud Examiner, who will conduct an expedited investigation before making the appropriate referral."