



Developmental Disabilities (DD) Waivers Wait List Review

August 2021

From April to May 2021, a record review of documentation required for placement on the DD Waiver List was conducted by Regional Support Specialists (RSSs) for individuals on the statewide DD waivers wait list. This was accomplished via an individual record review at each of the 40 Community Services Boards (CSBs) with a random sample of 5% of the individuals on that CSB's portion of the waiting list, divided among the three Priority Needs statuses. A total of 777 records were reviewed; this included 213 from Priority One, 340 from Priority Two, and 224 from Priority Three.

Process

For consistency in the results, the review process, including documentation and decision-making, was standardized in advance of the first review. To reduce divergent decision making, RSSs met to review standards as a team. In addition, the team collectively reviewed specific cases they encountered which raised interpretive questions. CSBs were informed in advance of the documentation that was to be reviewed. It was emphasized that the review was exploratory in nature to identify areas for additional clarification or education.

The basic elements of the review included:

- The presence of documentation affirming a diagnosis of developmental disability
- The presence of a Virginia Individual Developmental Disability Eligibility Survey (VIDES) that affirmed that the person met functional eligibility criteria for placement on the wait list
- Documentation of accurate designation of Priority criteria and status
- Documentation verifying accurate assignment of points on the Critical Needs Summary
- Documentation that the individual and/or caregiver confirmed that they would accept waiver services, if offered, within 30 days.

Impacts of COVID19

A random draw of names of individuals on the Wait List was conducted on March 8, 2021 and included records for 777 people across all CSBs. The RSS team started conducting reviews of the documentation in CSBs' EHRs on or about April 15, 2021. Most of these reviews were completed via remote access to the EHR. Some CSBs chose to gather and submit records for review via e-mail. When the RSSs had access to the EHR, they had access to the entire record and could search the entire record, but when CSBs chose to submit via e-mail, the RSSs reviewed only the subset of the record that was submitted. Generally, those CSBs choosing to submit via email submitted more complete records this year than last year. Although COVID19 continues to impact operations across the CSBs, DBHDS is grateful for the

cooperation and consideration of the CSBs, which allowed staff to complete thorough reviews in a timely fashion.

Findings and Recommendations

The waitlist review is intended to find areas where CSBs can improve their standard operating procedures, as well as understanding of the regulations and documentation requirements associated with the waitlist. It also helps DBHDS identify common spheres of concern and areas where DBHDS can provide additional guidance, training, and clarification. Each CSB received feedback and technical assistance directly from their RSS on the findings at their particular CSB on a standardized form that included particular records which were in need of attention. This report is intended to identify broad trends and areas of concern across the state. Data tables are at the bottom of the report. Figures within this report and in the data tables represent some rounding and may not always equal 100%.

Diagnostic Eligibility

1. 85% of records reviewed had a diagnosis of a developmental disability, which was clearly supported by documentation from a qualified professional.
2. In 9% of the records reviewed there was no documentation available for review. CSBs should have documentation that supports diagnostic eligibility in their record prior to placing individuals on the waitlist and should maintain that documentation in their record. In a few cases individuals appeared to have been put on the waiting list based on a verbal report from a parent, but without documentation.
3. In 6% of cases, the documentation that was available for review did not support a diagnosis of a developmental disability. Some examples include people whose documentation supports only a diagnosis of a mental health disorder such as depression and psychosis. There is an individual on the waitlist listed as having autism spectrum disorder but the documentation provided does not diagnose the individual with ASD.
4. Overall the findings in diagnostic eligibility are similar to the 2020 waitlist review where 88% of the diagnosis were supports, 7% did not have documentation available for review and 2% of records did not support a DD diagnosis.

Functional Eligibility

Functional eligibility is established via the completion of the VIDES. 767 of the 777 (98.7%) individual records reviewed had a VIDES in their record in WaMS. One additional individuals had a VIDES in the EHR. In nine cases there was no VIDES available for review.

Where there were records to review 767 out of 768 people met the criteria to be on the waitlist and one individual did not meet the functional criteria for waiver.

The very small number of people who are on the waitlist without a VIDES in WaMS represent a percentage of the people who were on the waitlist prior to the 2016 Waiver redesign. Anybody added to the waitlist since 2016 must have a VIDES completed in WaMS before they can be added to the waitlist. The RSS team runs data reports and sends those to CSBs on a monthly basis indicating people

on the waiting who do not have a VIDES in WaMS. DBHDS encourages CSBs to ensure that all people on the waitlist have a VIDES entered in WaMS.

Priority Needs Checklist

A Priority Needs Checklist was present in WaMS for 89% of the records reviewed. There was no Priority Needs Checklist in WaMS for about 11% of records reviewed. In some of the cases where there was no Priority Needs Checklist in WaMS, RSSs were able to locate a Priority Needs Checklist in the EHR and reviewed that. CSBs should utilize WaMS as the default location to complete a Priority Needs Checklist because WaMS is the only place that is used for reporting and for determining the review pool for a Waiver Slot Assignment Committee. Completing a Priority Criteria Checklist in the EHR risks having a person excluded from the review pool when they should be considered.

RSSs found documentation which supported the selected priority criteria in 73% of the cases reviewed. This was a substantial improvement from the 43% of records where documentation supported the selected priority in the 2020 review.

In 23% of the cases reviewed there was no documentation to support the priority criteria selected. While a good improvement from the 50% in the 2020 review, all people on the waitlist should have documentation to support the priority criteria which is marked. There are multiple ways and places where a CSB could document this information, but the simplest one is in a contact note completed at the time a new or updated Priority Needs Checklist is completed. CSBs received a list of individuals who lacked documentation for their Priority Needs Checklist.

In 2.4% of the records reviewed, the RSS found information in the record that established that the individual did not meet the criteria selected. Having a person in the wrong priority criteria may result in a person receiving a slot that should not have, while another person that may have received that slot did not. These records were referred to CSBs for review. In these cases the CSB was given a list of individuals whose Priority needed correction.

Critical Needs Summary

Only people in Priority One are required to have a Critical Needs Summary (CNS) form completed. RSSs reviewed the Critical Needs Summary information for the 213 reviews completed for Priority One individuals. Of those 213 records reviewed, 212 of those had a Critical Needs Summary completed in WaMS, representing 99.5% of the records reviewed. This also represented substantial improvement from the 88% of records that had a CNS in WaMS in the 2020 review.

Of the 212 CNS forms which could be reviewed, just 109 (51%) had documentation that supported the criteria marked. In 78 cases (37%) there was no documentation in the record to support the CNS rating selected and in 25 cases (12%), the criteria selected were contraindicated by documentation in the individual's record. In 2020 just 39% of reviews found documentation that supported the CNS criteria, so this represented another areas of improvement in documentation. In cases where the documentation was absent or contradicted the criteria chosen, the CSB received a list of individuals whose records needed attention.

CSBs need to document how they determine that an individual meets the Critical Needs Summary for each criteria they mark. Although there are multiple ways and places where a CSB could document this information, the simplest one is in a contact note which is completed at the time a new or updated Criteria Needs Summary is completed.

Slot Acceptance

CSBs also improved in their documentation that individuals would accept waiver services within 30 days of a slot being assigned. This has been the lowest area of compliance in previous reviews. This documentation remains low, but a full 25% of records reviewed indicated that the individual would accept services within 30 days. This represents a large improvement over previous reviews. In 2020 just 6% of the records reviewed had this documented.

Next Steps

1. Overall, the review revealed improvements in most categories, with fewer records found to be missing documentation. Almost all of the Critical Needs Summaries are now entered into WaMS. Of the records with documentation, more of them clearly supported the criteria selected. Particular gains were made in documenting support for the criteria selected on the Priority Needs Checklist and documentation of willingness to accept the slot in the required timeframe.
2. RSSs have reviewed results individually with each CSB using a standardized feedback form which indicates specific records for which documentation needed attention in each area of review. RSSs will continue to send monthly reports to CSBs about the VIDES. RSSs have provided training on the Priority Needs Checklist and Critical Needs Summary. They are available to review criteria and provide new or refresher training on the criteria and documentation needed.
3. CSBs should ensure that they are clearly documenting all of the needed information for people who are on the waitlist. There is no one prescribed method for documenting, but a contact note completed at the time of placement on the waitlist or change in the Priority Criteria Checklist or CNS is a simple, straightforward way to document this information.
4. DBHDS revised the Priority Needs Checklist and Critical Needs Summary in 2021. These changes are now reflected in updated forms in WaMS. These new forms provide a checkbox to indicate that the individual/family will accept services within 30 days of being assigned a slot. The forms also include space to document how the individual meets the criteria selected. There is also increased guidance on the form to help with consistency.
5. RSSs will reach back out to CSBs that had areas of serious concern (i.e., individuals without adequate documentation of DD diagnosis, missing VIDES, improper prioritization) during the late summer months to ensure that these issues have been remediated.
6. DBHDS will conduct the next review of the waiting list starting in Spring 2022.

DATA TABLES

Figure 1-Diagnosis

Finding	Count (Total 777)	Percentage of Total Reviewed
There is substantiating documentation in the record which supports eligibility	662	85%

Figure 2-VIDES

Finding	Count (Total 777)	Percentage of Total Reviewed
VIDES in WaMS	767	99%
VIDES in EHR/Not in WaMS	1	<1%
No VIDES completed	9	1%
Meets VIDES Criteria	767	99%
Does not meet VIDES criteria	1	<1%

Figure 3-Priority Needs Assignment

Finding	Count (Total 777)	Percentage of Total Reviewed
Priority Needs Checklist completed in WaMS	689	89%
No Priority Needs Checklist completed in WaMS	88	11%
Documentation supports Priority Needs scores	564	73%
Documentation not available or does not support Priority Needs Scores	196	25%
Available documentation supports a different criteria but not a different priority	14	2%

Figure 4-Critical Needs Scoring for Priority 1 Individuals

Finding	Count (Total 777)	Percentage of Total Reviewed
Priority 1 individuals in review sample	213	27% <i>(Requirement for this effort's sample was no fewer than 3 records per CSB per priority...)</i>
Priority 1 individuals with Critical Needs Summary in WaMS	212	99%
Priority 1 individuals with no Critical Needs Summary in WaMS	1	<1%
Documentation supports Critical Needs ratings assigned	109	51%
No documentation to support Critical Needs ratings assigned	78	37%
Where documentation is available, basis for points assigned is contradicted	25	11%

Figure 5-Individual Would Accept Services in 30 Days

Finding	Count (Total 777)	Percentage of Total Reviewed
No documentation present that individual would accept services in 30 days	571	74%
Documentation present that individual would accept services in 30 days	195	25%