



**North Carolina Department of Health and Human Services  
Division of Aging and Adult Services**

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Director

**DAAS Administrative Letter No. 09-19**

To: Area Agency on Aging Directors  
DSS Directors  
DSS Adult Services Supervisors

Subject: Restructuring the Monitoring of the In-Home Aide Program

Date: October 1, 2009

The provision of in-home aide services is vital to persons with functional impairments. It is a service area with a large and growing wait list and one to which significant public funds are allocated. The Division of Aging and Adult Services (DAAS) is committed to assuring good stewardship of these funds and to providing quality in-home aide services throughout the state.

During the past year, DAAS has restructured the In-Home Aide monitoring tool (<http://www.ncdhhs.gov/aging/contents.htm>) and the monitoring process. While the revised tool and process will go into effect immediately for all Area Agencies on Aging (AAAs) and County Departments of Social Services (DSSs) and their subrecipient providers, we will use this year as a time for learning and providing technical support for issues and concerns. In-Home Aide Services funded by the Home and Community Care Block Grant (HCCBG), the Social Service Block Grant (SSBG), and the State In-Home Fund will be comprehensively monitored by AAAs and DAAS staff using the new tool and process with one exception. In regard to services supported by the SSBG or the State In-Home Fund, at this time the changes will apply only to the monitoring of services provided to adults age 18 and older and not to the monitoring of services for children.

Background and Rationale

The rationale for the restructuring of this monitoring process is based on several factors. Currently, multiple tools and processes are being used to monitor this program by the AAAs, DAAS staff and the county DSSs therefore a more uniform protocol for conducting monitoring is needed. In addition, while DAAS continues to work and communicate with the Division of Health Services Regulation (DHSR) in its regulation of home care services, ongoing changes in the home care industry and DHSR's capacity for oversight of the various providers have heightened the need for DAAS to standardize and strengthen the assessment of In-Home Aide Services funded by its resources. Adequate oversight of this service area is increasingly

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important given the vulnerable population served and the limited funding available relative to the growing service needs. A lot has changed since 1995, when the policy regarding the monitoring of In-Home Aide Services was last substantially revised.

For AAAs and DAAS staff, a more in-depth review process will require more time on-site to review records. DAAS, while developing a more in-depth and more uniform review process, took into consideration the impact of monitoring changes on staff resources. DAAS will continue to use a risk-based approach to monitoring as the accepted standard in order to assure consistent monitoring and equity among service providers to promote quality service delivery for clients.

#### Overview of Changes in the In-Home Aide Monitoring Tool

For a number of years, the scope of DAAS and AAA monitoring has been greatly abbreviated for In-Home Aide Service providers licensed by the state of North Carolina through DHR or accredited by a nationally recognized accreditation organization. After verifying an agency's current status in regard to licensure or accreditation, monitoring focused primarily on unit verification. DAAS's restructured monitoring process will require AAAs and DAAS staff to assure that providers are meeting all of the administrative requirements for the delivery of In-Home Aide Services detailed in the Division's rules for the Division's funding sources (10A NCAC 13J, 10A NCAC 6A, and 10A NCAC 6X). All agencies providing In-Home Aide personal care must also be compliant with rules related to having policies for all program administration as directed by the state's home care licensure rules (10A NCAC 13J). Areas of this expanded review include:

- Verification of/documentation of written policies and procedures for the administration of the service
- Comprehensive review of the client record
- Documentation of aide training and competency to provide care as assigned
- Documentation of appropriate supervisory contact
- Oversight of sub-contracted responsibilities (please see attached guidelines for contractual language that can be used to assure needed information is received from the subrecipient provider on an annual basis to be available at the monitoring location for the comprehensive review by the monitors).

#### Overview of Monitoring Responsibilities

The restructured monitoring process will continue to include a programmatic review (monitoring for compliance with basic service standards) of all In-Home Aide providers using HCCBG funds, on an as needed basis, but at least every three (3) years. The AAA staff will monitor agencies based on assigned risk of each provider (see sec. 308. 2D and 2E of the AAA policy and Procedures Manual). The DAAS staff will monitor DSS agencies following the guidance in the above-referenced manual for HCCBG funded In-Home Aide services. DAAS staff monitoring agencies funded with SSBG and the State In-Home Fund will monitor DSS agencies based on their standard assigned risk that is consistent with the AAA Policy and Procedures Manual sec. 308.

The monitoring process will include a client record review of ten (10) client records or 10 % of the total client caseload (agencies with less than 10 clients will have all records reviewed). Per the restructured In-Home Aide monitoring policy, if an agency has 251 clients or more, the monitor may choose to review 7-10% of the client caseload. DSS agencies monitored for SSBG and In-Home Aide Services funded with the State In-Home Fund will have an equitable sample of in-home aide clients monitored in addition to the programmatic and fiscal monitoring already in place for these funding sources.

Unit Verification of HCCBG reimbursements (review of source information documenting specific hours of service and records documenting client eligibility to receive services) is also to be conducted as needed, using assigned risk, but at a minimum every three (3) years. If the unit verification of HCCBG is done only at the time of the programmatic and client record review, the review of 10 client records or 10% of the total client caseload (agencies with less than 10 clients will have all records reviewed) is appropriate. If agencies are reviewed for unit verification on a more frequent basis than every three years, the sample size may follow the unit verification scale in section 308.2 B of the AAA Policy and Procedures Manual. The schedule for programmatic monitoring and unit verification is to be reflected on Exhibit 12 of the AAA Area Plan and on the Adult Services Monitoring Plan for DSSs. This change in the minimum requirement for conducting unit verifications from two to three years as it affects AAAs means that all AAAs will need to review and amend their Exhibit 12 Provider Monitoring Plan, as appropriate. Unit verifications may be conducted more frequently as a best practice or whenever needed. The primary reason for using a risk-based approach for unit verification is to assure efficiencies in the use of limited staff resources while focusing attention where most needed.

The restructured monitoring process will continue to rely on a random sample of applicable client records, but the process will be connected to the assigned risk of each agency. To aid the efficiency of monitoring, agencies will receive advance notice of 70% of the client records to be reviewed and 30% of the client records will be selected on-site at the time of the monitoring visit. Based on the assigned risk of an agency, monitors will have the option to not give advance notice about records to be monitored and/or to request additional client records for review during the monitoring visit. General guidance on the risk-based approach may be found in section 308.2 D and E of the AAA Policy and Procedures Manual. This document is available at the following link:

<http://www.ncdhhs.gov/aging/monitor/mpolicy.htm>. **(Please note that sec. 308 was revised as of 9/09 to reflect the restructured In-Home Aide monitoring tool and process (Administrative Letter 09-20).**

#### Communications between PCRs and AAAs

To strengthen overall communications about the monitoring and status of In-Home Aide Services funded by the HCCBG, the DAAS Program Compliance Representatives (PCRs) who monitor county DSSs for HCCBG-funded In-Home Aide Services will send their full monitoring report to the appropriate regional AAA and DSS Directors following the monitoring visit. PCR's will also send a copy of the follow-up report to the AAA Director and DSS Director when the corrective action plan is completed. When DAAS PCRs are monitoring HCCBG-funded In-Home Aide Services in a county DSS, a sample of SSBG and State In-Home Fund records will be included in their client record review. The PCRs will monitor In-Home Aide Services funded by SSBG and the State In-Home Fund in county DSSs that do not receive HCCBG funds at least every four years when they do

general programmatic and fiscal monitoring of these agencies. Results of In-Home Aide monitoring for SSBG and State In-Home Fund will be sent to the DSS Director. More frequent monitoring can be established for individual DSSs based on assigned risk.

#### Implementation Timetable

The AAA monitoring staff and the DAAS PCRs will begin using the new tool immediately for service providers and subrecipients. State Fiscal Year 09-10 will be a pilot year for the new tool and process. During this year-long grace period, the emphasis will be on providing technical assistance. Agencies not scheduled for monitoring in SFY 2010 are encouraged to use the tool to conduct a self-monitoring during the year-long grace period and to seek guidance in areas where the results of the trial monitoring reveals weaknesses. This trial year will allow monitors to become familiar with the tool, and it will allow agencies to become familiar with the more comprehensive monitoring of In-Home Aide Services. Based on this year's experience, DAAS will consider any further need for revising the monitoring tool and/or process and will work with AAAs and PCRs for full implementation effective July 1, 2010.

#### Electronic Formats

The monitoring tool is available in three formats for your convenience. Attached is the electronic version that provides the Program Administration component in an interactive PDF format and allows the monitor to complete the Program Administration tool using a laptop on-site. The Client Record Review is in a Microsoft Excel File that allows up to 20 client records to be reviewed by tabbing to each record number. The second format allows the monitor to print the Program Administration component for use as a hard copy and to print the two-page Client Record Review for each record to be reviewed. The third format provides the option of having one 30-page Word document for all client records (up to 20 clients).

The Client Record Review component of the In-Home Aide monitoring tool should be completed prior to completing the Program Administration component for ease in transferring needed information located in the client record to the Program Administration component. If using the electronic version, the compliance summary for the client records reviewed will be automatically tallied for the monitor. The Client Record component includes the questions for consumer contributions. Those responses are also electronically tallied when using the electronic format. Please note that there has been no change to the content of the Consumer Contribution component of the monitoring tool, but it is relocated to the Client Record Review component in the restructured monitoring tool.

To use the electronic format of the tool, the AAA will need to assure that all documents on the laptop are secured against unauthorized disclosure and use via its security policy. The work of the DAAS PCRs is covered under the DAAS security policy.

#### For Further Guidance

The monitoring tool and instructions are on the DAAS website under the In-Home Aide Program: <http://www.ncdhhs.gov/aging/contents.htm>. Instructions for use of the tool include a list of documents that provider agencies will need to have available for the monitoring visit.

Please remember that this change in the monitoring process relates to routine oversight and does not negate the need for monitors to examine any service-related problems that arise between scheduled monitoring visits.

DAAS appreciates your efforts to assure the quality of client services and the proper use of public funds. Please contact Donna White ([Donna.White@dhhs.nc.gov](mailto:Donna.White@dhhs.nc.gov)), Glenda Artis ([Glenda.Artis@dhhs.nc.gov](mailto:Glenda.Artis@dhhs.nc.gov)), Nancy Warren ([Nancy.Warren@dhhs.nc.gov](mailto:Nancy.Warren@dhhs.nc.gov)), Vicki Kryk ([Vicki.Kryk@dhhs.nc.gov](mailto:Vicki.Kryk@dhhs.nc.gov)), or Deborah Chavis ([Deborah.Chavis@dhhs.nc.gov](mailto:Deborah.Chavis@dhhs.nc.gov)) for assistance.

Sincerely,

A handwritten signature in black ink that reads "Dennis W. Streets". The signature is written in a cursive style with a large, stylized 'S' at the end.

Dennis W. Streets

dw

Cc: DAAS

Attachments: