

## Department of Human Services 2009-11 Policy Option Package

<b><u>Division Name:</u></b>	Administrative Services Division
<b><u>Program Name:</u></b>	Office of the Directory and Policy - Office of Investigation and Training
<b><u>Policy Option Package Initiative:</u></b>	Seniors and people with disabilities live safely and independently in their Communities.
<b><u>Policy Option Package Title:</u></b>	Enhanced Quality Assurance & Abuse Prevention
<b><u>Policy Option Package Number:</u></b>	269
<b><u>Related Legislation:</u></b>	LC 669

**Summary Statement:**

This Policy Option Package establishes a comprehensive Quality Assurance program within the Office of Investigations and Training (OIT) to achieve consistently professional investigations throughout the state, based on investigative core competencies

This POP enables OIT to initiate a comprehensive, research-based abuse prevention training program for consumers, families, providers, law enforcement agencies and other first responders

This POP enhances OIT's ability to investigate reports of abuse and neglect against people receiving mental health and alcohol and drug services in underserved areas of the state, and ensure that required corrective and preventive actions are carried out by providers.

**1. WHAT WOULD THIS POLICY OPTION PACKAGE (POP) DO AND HOW WOULD IT BE IMPLEMENTED?**

**Quality assurance**

This proposal would initiate a Quality Assurance (QA) program to provide statewide training and oversight of abuse investigations involving people with developmental disabilities (DD) and mental illness (MI). This program would promote consistency and professionalism in all abuse investigations. Core competencies would be established for all investigators, and OIT would train investigators to achieve the competencies. All core competencies would incorporate investigative standards and best practices. OIT also would provide oversight, maintain data and carry out other QA activities.

## **Prevention**

This initiative will develop and deliver a comprehensive abuse prevention training program designed to protect adults with DD and MI. The target audiences include consumers, family members, providers, brokerages, domestic violence and sexual assault response providers and victim assistance programs. OIT has been gathering information and suggestions about effective abuse prevention, both nationwide and from local community members for several months. OIT will evaluate its research to develop comprehensive training. Training will be delivered throughout the state. Consumers and their families, provider agencies, law enforcement officers and other first responders will be invited to participate.

## **Capacity**

There currently are 30 Oregon counties with fewer than 10 annual investigations of abuse and neglect against adults receiving mental health services. Consequently, county staff do not have the opportunity to maintain their investigative skills nor remain current in best practices. As a result, the quality of these investigations varies greatly throughout the state. In addition, there currently are no resources dedicated to investigating reports of abuse against Oregon's 60,000 adults receiving alcohol and drug (A&D) services. This POP proposes to provide OIT with the resources to meet these challenges.

## **2. WHY DOES DHS PROPOSE THIS POP?**

### **Quality assurance**

People with DD and/or MI should receive the same degree of protection from abuse, regardless of where they live. Maintaining consistency and quality in the investigative process in all 36 counties can be difficult. This proposal addresses that challenge by providing both training and oversight of county investigations by OIT to ensure consistency and quality statewide. County-based investigators will be required to achieve, demonstrate and maintain an understanding of core competencies and best practices.

### **Prevention**

Preventing abuse before it occurs is an agency goal. Implementing this program will address an unmet priority. The need to implement a prevention initiative to protect adults with DD and MI has been identified in statewide needs assessments, annual reports, information gained during abuse investigations, and focused discussions around the state.

### **Capacity**

Oregon citizens should receive the same degree of protection against abuse or neglect, regardless of where they live. In some rural counties, investigations of abuse against people with mental health issues number fewer than 10 each year, so maintaining consistency and quality in the investigative process can be a challenge. In addition, there currently are no resources dedicated to investigating abuse or neglect of the nearly 60,000 adults with addiction issues who access DHS-supported services annually. This proposal would provide investigative resources to meet that need.

## **3. HOW DOES THIS FURTHER THE AGENCY'S MISSION OR GOALS?**

### **Quality assurance**

The health and safety of Oregonians, especially vulnerable citizens, is a significant agency mission. This quality assurance program will help ensure Oregon's adults with DD or MI are protected from abuse and neglect. Professional, thorough, fair and timely investigations of alleged abuse not only protect individuals, they can identify broader systems issues that might contribute to abuse. By applying what is learned from competent investigations, OIT and community partners can create and design evidence-based abuse prevention programs to lower the incidence of abuse in Oregon.

### **Prevention**

Training consumers, family members, provider agencies and first responders on ways to prevent abuse before it occurs furthers the agency goals of public health and safety.

## **Capacity**

Professional investigation of abuse or neglect by OIT investigators applying best practices helps ensure that adults with A&D or mental health issues are safe. Such investigations also often reveal “systems” issues that increase the risk of abuse or neglect, which can be corrected if known

**4. IS THIS POP TIED TO A DHS PERFORMANCE MEASURE? IF YES, IDENTIFY THE PERFORMANCE MEASURE. IF NO, HOW WILL DHS MEASURE THE SUCCESS OF THIS POP?**

This proposal is fundamental to keeping people safe. People accessing services supported by DHS must have the basic right to safety and freedom from exploitation and abuse. This POP supports the following key performance measures:

KPM# 15: Domestic violence reduction and prevention

KPM# 16: Prevention or reduction of re-abuse of seniors and people with disabilities

KPM# 33: Customer service

**5. DOES THIS POP REQUIRE A CHANGE(S) TO AN EXISTING STATUTE OR REQUIRE A NEW STATUTE? IF YES, IDENTIFY THE STATUTE AND THE LEGISLATIVE CONCEPT.**

No statutory changes are required to implement the Quality Assurance and Prevention components of this POP.

However, statutory changes are required to implement the Capacity component of this POP. ORS 430.735 must be amended to include alcohol and drug clients in addition to mental health and developmental disability services clients. A companion LC has been developed.

## **6. WHAT ALTERNATIVES WERE CONSIDERED AND WHAT WERE THE REASONS FOR REJECTING THEM?**

### **Quality assurance**

OIT has 20 years of experience investigating reports of abuse and neglect of adults with DD and MI. By working closely with county-based investigators throughout the state for the past five years, OIT has identified variations in the quality and consistency of investigations statewide.

Because OIT has specific expertise in the core competencies and best practices that lead to sound investigations, OIT is in the best position to take the lead on this initiative. OIT has experienced staff who would be able to efficiently develop and deliver a curriculum on core competencies and best practices. Through their close work with county staff, including managers and investigators, OIT regional coordinators understand it is necessary to standardize protective service investigations. OIT also has a staff of experienced research analysts who can efficiently maintain and help interpret data regarding quality abuse investigations throughout the state. Consequently, other alternatives to providing quality assurance were not considered.

### **Prevention**

No alternative to initiating an adult abuse prevention program was considered because there is an identified unmet need relating to public health and safety that will be addressed by this initiative. OIT is in the best position to develop and deliver this training, because of OIT's particular expertise in identifying abuse and neglect of adults with DD and MI, and its expertise in identifying the factors that contribute to abuse. OIT has a team experienced in the delivery of abuse and neglect trainings to affected populations and providers.

### **Capacity**

There is no alternative to OIT conducting abuse investigations in those rural counties which have fewer than 10 abuse and neglect investigations each year, because the goal of this POP is to maintain a high quality of investigations throughout the state. Similarly, OIT is best able to assume responsibility for abuse investigations for adults receiving A&D services

**7. WHAT WOULD BE THE ADVERSE EFFECTS OF NOT FUNDING THIS POP?**

Not funding this POP would result in continued inconsistencies in the quality of abuse investigations, and would leave vulnerable adults with DD and MI at risk of abuse and neglect.

**Quality assurance**

If this project were not funded, variations in the consistency and quality of protective investigations in Oregon likely would continue.

**Prevention**

Without a focus on preventing abuse and neglect from occurring, adults with DD and MI would continue to be at risk.

**Capacity**

In those areas of the state in which protective service investigators conduct very few investigations each year, inconsistency in the quality of mental health investigations would continue. In addition, adults with addiction issues who received DHS-supported services would continue to receive no investigative services at all, with the exception of law enforcement interventions.

**8. WHAT OTHER AGENCIES (STATE, TRIBAL AND/OR LOCAL GOVERNMENT) WOULD BE AFFECTED BY THIS POP? HOW WOULD THEY BE AFFECTED?**

**Quality assurance**

Oregon's 36 counties would benefit from the training, certification and quality assurance that would be provided by OIT. Resources currently unavailable in the counties would be made available through OIT, resulting in improved quality of investigations throughout the state. Oregon would have certified investigators conducting abuse investigations in each county.

**Prevention**

DHS programs, licensing agencies, local providers and county programs, tribes, law enforcement agencies and other first responders would benefit from this program. Effective prevention of abuse would mean fewer agencies would need to expend resources addressing abuse after it occurs, either through licensing action, prosecution, relocation of clients or caring for clients after they have been the victims of abuse or neglect.

**Capacity**

Rural counties would benefit from the expertise of OIT, and the quality of investigations would be consistent throughout the state. Adults with addiction issues living anywhere in the state would receive a protective service previously unavailable to them

**9. WHAT ASSUMPTIONS AFFECT THE PRICING OF THIS POP?**

**Implementation Date(s):** July 1, 2009

**End Date (if applicable):** June 30, 2011

**a. Will there be new responsibilities for DHS? Specify which division(s) and describe their new responsibilities.**

- |  |  |
|--|--|
| <input checked="" type="checkbox"/> Administrative Services      | <input checked="" type="checkbox"/> Addictions and Mental Health |
| <input type="checkbox"/> Children, Adults and Families           | <input type="checkbox"/> Public Health                           |
| <input type="checkbox"/> Division of Medical Assistance Programs | <input type="checkbox"/> Seniors and People With Disabilities    |

**b. Will there be new administrative impacts sufficient to require additional funding? Specify which office(s) and describe how it will be affected.**

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Human Resources       | <input type="checkbox"/> Payment Accuracy and Recovery            |
| <input type="checkbox"/> Information Security/Privacy     | <input checked="" type="checkbox"/> Investigations and Training   |
| <input type="checkbox"/> Document Management              | <input type="checkbox"/> Facilities                               |
| <input type="checkbox"/> Audit and Consulting             | <input type="checkbox"/> Contracts and Procurement                |
| <input type="checkbox"/> Information Services (computers) | <input checked="" type="checkbox"/> Budget, Planning and Analysis |
| <input type="checkbox"/> Financial Services (accounting)  | <input type="checkbox"/> DHS Office of Communications             |

- c. **Will there be changes to client caseloads or services provided to population groups? Specify how many in each relevant program.**

It is anticipated that the Licensing Division of DHS/Addictions & Mental Health will experience increased caseloads as the result of increased corrective actions required of providers by OIT.

- d. **Will it take new staff or will existing positions be modified? For each classification, list the number of positions and the number of months the positions will work in each biennium. Specify if the positions are permanent, limited duration or temporary.**

Pos Count	FTE	Classification Title	Classification No.	No Mos	Step	Status (PF, PP, LD)
<b>ASD / Office of Director &amp; Policy (OIT):</b>						
1	0.88	Training & Development Spec 1	MMN X1338 AA	21	2	PF
1	0.88	Program Analyst 2	MMN X0861 AA	21	2	PF
1	0.88	Program Analyst 2	MMN X0861 AA	21	2	PF
1	0.88	Program Analyst 2	MMN X0861 AA	21	2	PF
1	0.88	Administrative Specialist 1	MMN X0107 AA	21	2	PF
1	0.88	Office Specialist 2	MMN X0104 AA	21	2	PF
1	0.88	Investigator 3	MMN X5233 AA	21	2	PF
1	0.88	Investigator 3	MMN X5233 AA	21	2	PF
1	0.88	Investigator 3	MMN X5233 AA	21	2	PF
<b>9</b>	<b>7.92</b>					
<b>AMH:</b>						
1	0.88	Compliance Specialist 3	MMS X5248 AA	21	2	PF
<b>1</b>	<b>0.88</b>					
<b>10</b>	<b>8.80</b>					

**Total Positions**

**e. What are the start-up costs, such as new or significant modifications to computer systems, new materials, outreach and training?**

- Salaries & benefits of permanent staff as indicated in 9d with associated Services & Supplies
- One million dollars pass-thru to support local investigation assistance and follow-up compliance monitoring provided by the Community Mental Health Programs

**f. What are the ongoing costs?**

- Salaries & benefits of permanent staff as indicated in 9d with associated Services & Supplies
- One million dollars pass-thru to support local investigation assistance and follow-up compliance monitoring provided by the Community Mental Health Programs

**g. What are the potential savings?**

**h. Based on these answers, is there a fiscal impact?**

Yes

**i. What are the sources of funding and the funding split for each one? Include grant names and fund type, such as “Medicaid, General and Federal Funds.”**

Administrative Services Division (ASD) / Office of the Director and Policy / Office of Investigations and Training (OIT) - General Fund (50%), Federal Fund - Medicaid (50%)

Addictions and Mental Health (AMH) - General Fund (100%)