Bulletin

OF INTEREST TO

- County Directors

- Social Services
   Supervisors and Staff

- Tribes

ACTION/DUE DATE

Immediately.

EXPIRATION DATE

April 25, 2010

DHS Announces Vulnerable Adult (VA) Common Entry Point (CEP) Implementation into the Social Service Information System (SSIS)

TOPIC
New data collection system for reports of vulnerable adult maltreatment.

PURPOSE
Alert counties regarding utilization of centralized database (SSIS) for VA CEP data.

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SIGNED

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I.   **Introduction/Background**

The purpose of the common entry point (CEP) is to establish a centralized reporting system for allegations of maltreatment of vulnerable adults within each county. Minnesota Statute, section 626.557 subdivision 9 states that each county board designates a CEP for reports of suspected maltreatment. The common entry point is the entity responsible for the receipt of reports of suspected maltreatment. The common entry point must be available to take reports 24 hours per day.

Mandated and voluntary reporters contact the CEP to make an oral report of suspected maltreatment. The report is taken by the CEP and then distributed to the appropriate lead agency for further assessment. The three lead agencies are: County Adult Protection Unit, Minnesota Department of Health – Office of Health Facility Complaints (MDH OHFC), and Department of Human Services – Licensing Division. Prior to 2008, a copy of the report was also sent to the Department of Human Services – Adult Protection Unit for data collection purposes. In anticipation of the need for a centralized automated data collection system for CEP data, Minnesota Statute, section 626.557 subdivision 9 (g) authorized that the CEP would log reports into a database once this database became available.

The Centers for Medicare and Medicaid Services (CMS) offered states an opportunity to use federal grant funding to improve their quality management infrastructure, in particular through technical enhancement. Minnesota applied for and was awarded a Real Choice Systems Change Grant in October 2003. One of the projects funded was the creation of business support for CEP activity.

Design teams made up of policy staff, state and county adult protection staff and technical staff, were formed to implement this grant project. A contractor developed the specifications for Vulnerable Adult reporting and information system. This occurred through extensive joint application requirements sessions with stakeholders and potential users. The design specifications focus included data needed for quality measures developed in collaboration with Minnesota Department of Human Services (DHS) staff, CMS technical assistance staff, and other stakeholders. Once requirements were captured, an alternatives evaluation was completed by the contractor to identify a business solution that met the project's criteria. It was determined through this process to enhance the Social Services Information System (SSIS) to support the vulnerable adult (VA) reporting system.

SSIS was the system chosen to host the centralized database. SSIS is currently being utilized by all 87 counties, plus two tribes for child protection/child welfare. Eighty-four of the 87 counties currently use SSIS for adult services in some fashion. Though SSIS was a system initially designed for child protection, a new vulnerable adults (VA) module is now available on SSIS Version 5.0. The addition of the vulnerable adult (VA) common entry point (CEP) reporting process is a new application into the current system. Both the CEP report taking and investigative findings or outcome reporting are now automated and available. This new information system will:

- improve the timely response to reports of alleged VA maltreatment
- improve the efficiency of work processes between the CEP and lead investigative agencies
- increase the quality of data regarding VA maltreatment in Minnesota
- provide business support to county adult protection in local investigations of maltreatment alleging involvement with caregivers, non-licensed providers or self-neglect

Scott, Washington, Hennepin and Itasca counties have participated in pilot testing since November 2007 and will continue through statewide rollout. Installation of SSIS Version 5.0 occurred in a staggered fashion from March 20-28, 2008.

II.   Action Required

All counties will use SSIS to record VA reports received through the CEP process. Counties will also enter the investigative findings for those reports that the county is responsible to investigate as required by Minnesota statute and rule.

> **Minnesota Statute, section 626.557, subdivision 9 Common entry point designation.**
> (g) When a centralized database is available, the common entry point has access to the centralized database and must log the reports in on the database.

> **Minnesota Rule part 9555.7700 Reports to the State Agency.**
> Subpart 1. Initial report. Every incident of abuse or neglect reported to the local social services agency shall be reported to the social services division of the state agency on forms provided by the state agency. The local agency shall send the completed report form to the state agency within 20 days of receiving the complaint, whether or not the classification of the report has been determined according to part 9555.7500.

The automated system has been designed to better support multiple lead agency functions including:
1.   the common entry point (CEP) data collection process
2.   electronic distribution of the referral report to the lead investigative agency
3.   notification of initial disposition
4.   investigation of maltreatment
5.   summary report of maltreatment
6.   notification of final disposition
7.   updated offender list

As a result of the system developed, DHS anticipates that the CEP and county lead agencies will have increased ease of access to the substantiated perpetrator list and there will be increased accountability among the CEP, lead agencies and other business partners. The data gathered from SSIS will be used to evaluate quality in services provided to vulnerable adults, assess

trends in maltreatment, improve and target training on issues of maltreatment and better identify opportunities for program improvement.

Vulnerable adult maltreatment CEP report entry in SSIS is required for all of 2008. Reports received by counties before the SSIS 5.0 statewide release will require back entry into SSIS. Counties will have 12 weeks beyond the SSIS 5.0 statewide release date to back enter those reports.

***If a county is not able to accommodate backloading deadlines, please contact us to work out another way to get the data into the system. While we expect counties to enter all reports, we will certainly work with specific counties to provide assistance in the event of an isolated problem.**

<u>How do I back enter reports of suspected maltreatment (DHS 3243) into SSIS?</u>
Counties that are currently entering their vulnerable adult maltreatment reports in SSIS, will need to add an Adult Maltreatment report to those existing Adult Protective Services (APS) workgroups:

- Intake workgroup
  - o If the Intake workgroup is closed, re-open the workgroup (with appropriate county assigned security)
  - o Add an Adult Maltreatment report

- Adult Protective Services (APS) Assessment workgroup
  - o If the Assessment workgroup is closed, re-open the workgroup
  - o Add an Adult Maltreatment report
    Note: The ability to add a new Adult Maltreatment report to a closed APS Assessment workgroup is a temporary feature for back loading only. It will be enabled until July 1, 2008 (12 weeks after launch).

- Adult Protective Services (APS) Case Management workgroup
  - o If the county business process includes transitioning from Assessment to Case management workgroup:
    -If the Case Management workgroup is closed, re-open the workgroup, and
    -Use WG Change log to transition from Case Management to Assessment, and
    -Follow instructions for APS Assessment workgroup above.
  - o If the county has separate Assessment and Case Management workgroups:
    -Follow instructions for APS Assessment workgroup above.

- Adult Services (AS) General Assessment or Case Management workgroup
  - o If the Adult Services (AS) General program was used to enter Adult Maltreatment

reports, a data fix request will be required to change the program to APS. Counties may email data fix requests to ssisdata@state.mn.us.

Counties that have not previously entered their vulnerable adult maltreatment reports in SSIS, will need to add these reports as they would current reports, making sure they record the date the report was received rather than the current date.

There are preset close reasons in Intake and in Assessment workgroups. It is suggested all counties use the comments tab in the Intake workgroup to document the close reason when the closed reason is "screened out maltreatment report". (ie: not a vulnerable adult, etc.)

How will SSIS manage data destruction requirements?
The SSIS system is designed to manage the data destruction requirements. Currently there are conflicting record retention requirements in Minnesota Statutes, section 626.557, subdivision 12b (a) and (d) regarding the CEP and investigative data. DHS staff consulted with data privacy personnel and also obtained a legal opinion regarding the conflicting data retention schedules. Recommendations were to retain all such records for a minimum of three years. DHS has determined that for "false" and "no determination" reports retention schedules should be increased to 3 years to accommodate the CEP record retention schedule of 3 years. The schedule will follow these guidelines:
3 years: false, no determination and CEP data
4 years: inconclusive
7 years: substantiated

Will I be able to look up a licensed provider within SSIS?
One of the new features available for VA-CEP is the *LNDX*, or Licensed Facilities Index. This will be updated nightly. CEP staff will be able to do a search, from within SSIS, of all facilities licensed by either DHS or MDH (Minnesota Department of Health). However, sometimes there are reports that involve facilities or programs that aren't licensed, but still need to be investigated by either county adult protection staff or by one of the state lead agencies, DHS or MDH. Examples include board and lodge facilities licensed by cities and unlicensed personal care assistant (PCA) providers and agencies.

Some of these facilities and programs are already vendors for the agency. If so, staff can find them through the standard SSIS Provider Search. However, for any provider, facility or program that is not licensed and is not a vendor for your agency, you can enter them as a business organization ("Bus. Org." or "Biz Org") in SSIS so that they are available for searching and selecting by CEP staff in version 5.0.

How will reports be sent to DHS Licensing, MDH OHFC and law enforcement?
The electronic data transfer option is not yet available. Counties will print out the CEP report and continue to send reports to DHS Licensing and MDH via fax.

Electronic data transfer will not be available for law enforcement entities. Counties will print out the CEP report and fax to the appropriate law enforcement entity when applicable.

When the electronic data transfer feature is available for DHS Licensing and MDH, reports will be sent to DHS Licensing and MDH via this avenue. When the CEP has been completed, counties will use the referral tab within the "Adult Maltreatment Report" and choose the "send to lead agency" option. Once sent, a confirmation message stating, "CEP has been successfully sent" will be received.

Will I still have to send reports to DHS Adult Protection?
The system will eliminate the use of forms 3243 (CEP) and 2494 (Investigative Summary). Counties will no longer be required to submit both to DHS Adult Protection for data collection purposes. This data will be obtained directly though SSIS from 1/1/08 going forward.

Where can I go when I have questions regarding SSIS?
Please see the Tip Sheet located at www.dhs.state.mn.us in the Adult Protection section for answers to frequently asked questions. This Tip Sheet was designed by the SSIS team in anticipation of questions asked during pilot. Additional items will be added to the Tip Sheet on a regular basis. SSIS will notify adult protection staff and it will be distributed to counties.

Additionally, each county has an SSIS mentor. The mentor receives frequent emails and attends regular meetings/trainings regarding SSIS updates. If your mentor is not able to assist you with your questions, the mentor can contact the SSIS helpdesk at 651-431-4801.

III. Americans with Disability Act/Special Needs
This information is available in other forms to people with disabilities by contacting us at 651-431-2600. TDD users can call the Minnesota Relay at 711 or (800) 627-3529. For the Speech-to-Speech Relay, call (877) 627-3848.