Subject: Protective Services Quality Assurance Monitoring Protocol

To: Pennsylvania Department of Aging
Area Agencies on Aging
Pennsylvania Association of Area Agencies on Aging
Pennsylvania Council on Aging

From: Teresa Osborne
Secretary

Purpose: The purpose of this Aging Program Directive (APD) is to notify the network of revisions to the onsite protective services (PS) monitoring schedule and quality assurance measures.

Background: Ongoing assurance of compliance with the Older Adult Protective Services Act, regulations, and Departmental directives have been accomplished through each agency’s internal quality assurance efforts as well as the Department of Aging’s (PDA) on-site monitoring visits. These meeting opportunities have occurred regularly and through ongoing technical assistance.

Directives: To further enhance quality assurance measures already in place, PDA is issuing the following quality assurance guidelines:

Scenarios that may trigger quality assurance monitoring of protective services include, but are not limited to, an annual (scheduled) monitoring visit, legislative inquiry, complaint being received, appeal being filed, etc. In any of these situations, PS Office staff pull a random sampling of PS cases for review. These cases will include substantiated, unsubstantiated and no-need cases.
Depending upon the results of the initial cases reviewed, it will be determined if further cases should be reviewed or if the initial sample is sufficient to establish a pattern of agency performance.

A green, yellow and red designation will auto-populate onto a statewide map of the counties. This designation will be based on the monitoring findings recorded on PDA’s designated monitoring spreadsheet. Certain questions on the monitoring spreadsheet will be more heavily weighted than others based on the direct impact on the older adult. Questions that will be weighted most heavily are:

- Accuracy of category assigned to case
- Investigation started within required timeframes
- Comprehensive investigation completed (including all areas of abuse, neglect, exploitation and abandonment explored during investigation)
- Adequate information gathered to make substantiated or unsubstantiated determination
- PS care plan developed and presented to older adult
- Risk reduced/eliminated

The steps defined below shall be implemented only after PDA has completed case reviews/ quality assurance monitoring and an exit conference with the AAA Director (or his/her designee) has been conducted. The following steps will be applied to AAAs based on their performance level.

**Monitoring results that indicate no or minimal quality issues and that no individuals were left at risk. GREEN**

1. A letter is sent to the AAA Director including a request for a corrective action plan (CAP). The CAP will be submitted to PDA PS Specialist within 30 days of the receipt of the letter. The next monitoring visit will be in approximately 1 year or upon receipt of a complaint or information indicating poor program performance.

**Monitoring results reveal significant or repetitive quality issues, however; no individuals were left at risk. YELLOW**

1. A letter is sent to the AAA Director including a request for a CAP. The CAP will be submitted to PDA PS Specialist within 10 days of the receipt of the letter.

2. Within 30 days of receipt of the post-monitoring letter, the AAA will submit proof of retraining to all PS staff. If TA is needed from PDA staff, it will be provided.
3. The next quality assurance monitoring will be in approximately 6 months or upon receipt of a complaint or information indicating poor program performance.

**Monitoring results reveal significant and/or repetitive quality issues and one or more individuals were left at risk.**

1. A letter is sent to the AAA Director including a request for a CAP. The CAP will be submitted to PDA PS Specialist within 10 days of the receipt of the letter.

2. Within 30 days of receipt of the post-monitoring letter, the AAA will submit proof of retraining to all PS staff. If TA is needed from PDA staff, it will be provided.

3. A follow-up, on-site technical assistance visit by PDA PS Office staff will take place within 60 days of the receipt of the post-monitoring letter. This visit will be followed by a written letter memorializing the findings and/or actions taken by PDA and the AAA.

4. A subsequent, on-site follow-up quality assurance monitoring visit will take place within 90 days of the date that the CAP was approved. This visit will be followed by a written notice of findings from PDA and a request for a CAP if needed. This CAP will be due no later than 10 days from the date of the AAA’s receipt of findings.

If the findings continue to reveal significant and/or repetitive quality issues or if any individual was left at risk, an in-person meeting at PDA will be held. This meeting will bring the AAA executive, supervisory and program staff together. In addition, it could also include AAA governance such as a County Executive, Human Services Director or County Commissioner or Board of Directors member(s) along with the PDA Deputy Secretary, appropriate PDA program/service staff and potentially the PDA Secretary.

At this meeting, concerns will be reviewed. Following this meeting, the AAA is required to submit a weekly status of each open PS case, status of any case closed, and a plan to address any open cases. PDA will provide all PS staff with training to remedy the identified quality issues within 30 days of the meeting.

5. In the event that the steps described above have been exhausted and persistent serious quality issues continue, PDA will pursue all available options including alternative entities to provide protective services in accordance with the Older Adults Protective Services Act (35 P.S. §§10225.101, *et seq.*) and the implementing regulations (6 Pa. Code Chapter 15).