

PENNSYLVANIA DEPARTMENT OF AGING



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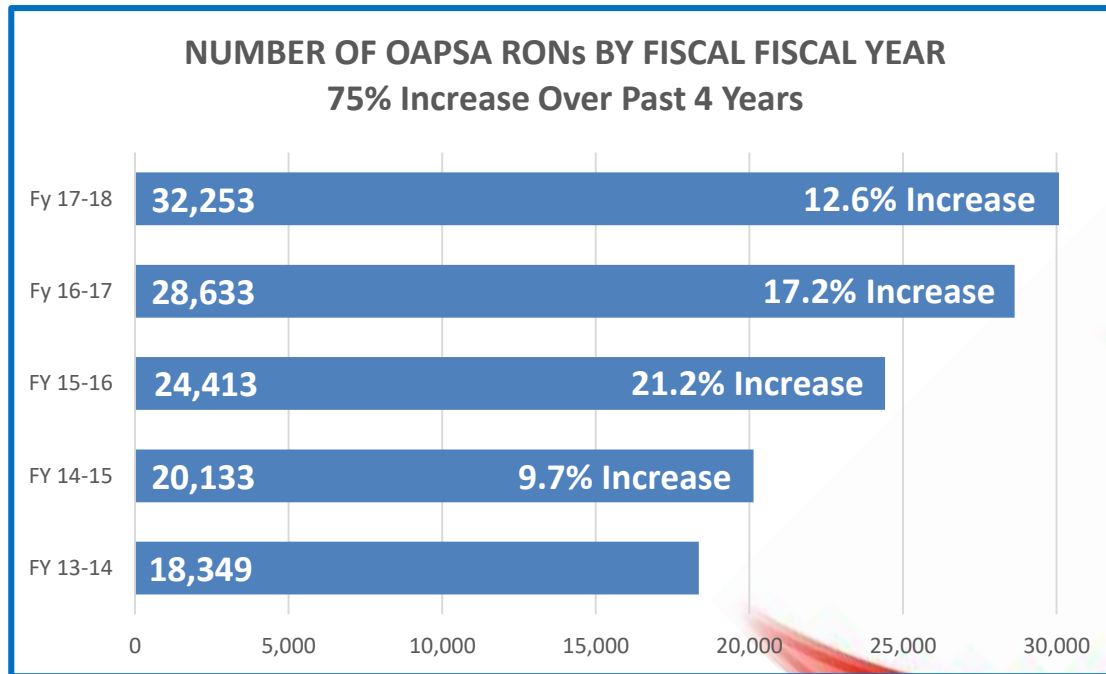
June 2019  
Denise Getgen, Director  
Protective Services Office

# The Older Adults Protective Services Act (OAPSA)

- Voluntary Reporting  
General Public
- Background Checks for LTC employees  
All get PA State Police checks  
Some get PA State **AND** FBI Checks
- Mandatory Reporting  
Facilities (NH, PCH, ADC, HH, DC, etc.)

# PA Elder Abuse Statistics

Reports of Abuse Continue to Increase Each Year



# Office of State Inspector General Report

## Findings and Recommendations

### Findings:

- #1. Face-to-Face (F2F) interviews greater than 72 hours
- #2. 20 days to determination for abuse and neglect
- #3. Insufficient training
- #4. PDA not performing active case monitoring
- #5. Lack of timely guidance regarding case management
- #6. Inadequate PDA staffing

# Finding #1

In **20.4%** of the 18,275 cases (3,724), the AAAs failed to conduct a face-to-face interview of the alleged neglected or abused older adult within the required 72 hours.

TIME IN WHICH FACE-TO-FACE VISIT OCCURRED	NUMBER OF CASES
4 Days to 6 Days	1,603
7 Days to 10 Days	766
11 Days to 20 Days	619
21 Days to 100 Days	495
101 Days to 364 Days	71
** One Year or Greater	170

**Table 1. *Time Delay in 3,724 RONS for Which the Face-to-Face Visit Exceeded 72 Hours***

**\*\* NOTE:** The OSIG recognizes that many of these entries might have resulted from an incorrect year being entered into the PDA database for the interview date. For example, many of these records show the interview took 365 or 366 days to occur, which would result from entering the wrong year (2017 rather than 2016) into the database in cases where the interview actually took place by the next day after the RON was received.

*In another 4.8% cases (875), the AAAs entered insufficient or incorrect data*

# The Regulatory Reference

## § 15.42. Standards for initiating and conducting investigations

### (a) *Requirements by report category.*

#### (1) *Emergency report.*

(i) The investigation of a report categorized as emergency shall be initiated immediately following the referral of the report. The protective services caseworker shall make every attempt to ensure the immediate safety of the older adult and to **conduct a face to face visit as soon as possible**. The agency shall assure that reasonable attempts will be made to **conduct a face to face visit within 24 hours** after the report is received.

# The Regulatory Reference

## § 15.42. Standards for initiating and conducting investigations

(a) *Requirements by report category.*

(2) *Priority report.*

(i) The investigation of a report categorized as priority shall be initiated as soon as possible. The agency shall assure that reasonable attempts to **initiate the investigation will be made within 24 hours** after the report is received. The investigation of **a priority report is initiated only by contact with the older adult** reported to need protective services. The protective services caseworker shall make every attempt to **visit with the older adult face to face within the 24 hours provided. . .**

# The Regulatory Reference

## § 15.42. Standards for initiating and conducting investigations

### (a) *Requirements by report category.*

#### (3) *Nonpriority report.*

(i) The investigation of a report categorized as nonpriority shall be initiated in a timely manner but never later than 72 hours after the report was received. At the discretion of the agency, the initiation of an investigation of a nonpriority report shall include a visit to the older adult reported to need protective services when details in the report indicate a need to see and talk with the older adult face to face to secure or verify facts essential to the ongoing investigation.

(ii) The investigation of a report categorized as nonpriority **shall include at least one visit to the older adult** reported to need protective services **at an appropriate point in the course of the investigation. . .**



# Addressing Finding #1

- Implemented changes to the Investigation, Summary and Assessment (IS&A) form to allow for more accurate data collection regarding the timing of the face to face visits
- Clarification has been provided regarding when a face to face visit is required for Non-priority cases (see Guidance Tool page 24) (March Supervisory Webinar and March Quarterly)
- Implemented/Issued APDs:
  - ✓ Act 53 of 2018 (Neglect and Abuse of a Care Dependent Person)
  - ✓ Locating Missing Older Adults including SAMS Documentation Manual
- Pending Implementation
  - ✓ Active cases will be incorporated into QA Monitoring
  - ✓ APD #17-24-01 will be updated
  - ✓ APD regarding when older adult dies during ongoing PS investigation
  - ✓ APD re: abuse and neglect cases open over 20 days
  - ✓ APD re: Intake Worker Training Curriculum Requirements

# Finding #2

In **43%** of the 18,275 cases (7,859), the AAAs did not determine whether the allegation of abuse was substantiated within the required 20 days.

TOTAL TIME IN WHICH DETERMINATION MADE	NUMBER OF CASES
21 Days to 30 Days	2,186
31 Days to 40 Days	1,269
41 Days to 50 Days	920
51 Days to 64 Days	840
65 Days to 100 Days	1,095
Greater Than 100 Days	1,549

**Table 2. Time Delay in 7,859 RONs for Which the Determination Exceeded 20 Days**

*In another 6.2% (1,151), the AAAs entered insufficient or incorrect data*

# The Regulatory Reference

## § 15.42. Standards for initiating and conducting investigations

The agency shall make all reasonable efforts to complete an investigation of a report of need for protective services under this section as soon as possible and, in cases of abuse and neglect, at least within 20 days of the receipt of the report. The investigation of the report is completed only when the report has been determined to be substantiated or unsubstantiated and, if substantiated, after necessary steps have been taken to reduce an imminent risk to the older adult's person or property.

# Addressing Finding #2

- PDA now delivering weekly QA reports to all AAAs:
  - ✓ Active cases grouped by caseworker
  - ✓ Caseworkers with a caseload of more than 30
  - ✓ Number of days since investigations last updated
  - ✓ Number of days since last care plan journal notes entered
  - ✓ PS Care Enrollments/Cases active for more than 60 days
  - ✓ PS Care Enrollments/Cases with missing investigation forms and/or Care Plans
  - ✓ Care Plans without an assigned Care Plan Care Manager
- Deployed software to deliver automated custom reports to all AAAs
  - ✓ 75% of AAAs reported report helpful in managing workload

# New PS QA Case Inspection Report

**Weekly Quality Assurance Protective Services Case Inspection Report**  
 Review required to ensure compliance with state regulations  
**Wabash County AAA**  
 Excludes records with PS activity within the past 7 days\* as of 9:04 am on 3/13/2019  
 See end of report for details and instructions.

SAMS Report Location: Report Type: Administrative Title: PDA OAPSA - QA Case Inspection 17

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**Agency's Total Active PS Care Enrollments** Total Cases Assigned (not to exceed 30): 17

Case Manager	SAMS ID	CP Start	ISA Date	CE Created	CPJ Last Update	CE Days Active	CP Care Manager	CPJ Last Update	ISA Last Update	Total Cases Assigned (not to exceed 30)
Thomas A. Anderson	1xxxxxxx3	01/28/2019		01/28/2019		45	Thomas A. Anderson	01/29/2019		1
Brock Lee	1xxxxxxx8	09/13/2018		09/13/2018		182	Brock Lee	03/08/2019		4
Dusty Rhodes	1xxxxxxx6	03/11/2019		03/11/2019		3	Brock Lee	03/12/2019		1
Barb Dwyer	1xxxxxxx6	01/22/2019		01/22/2019		51	Barb Dwyer	02/20/2019		3
Justin Case	1xxxxxxx5	02/19/2019		02/19/2019		23	Marty Graw	03/11/2019		1
Marty Graw	1xxxxxxx5	02/19/2019		02/19/2019		23	Marty Graw	03/11/2019		3
No Active CP	1xxxxxxx2	08/10/2018		08/10/2018		216	No Active CP			2
Paige Turner	1xxxxxxx4	08/29/2018		08/29/2018		197	Paige Turner	09/12/2018		2

Page 1 of 3  
 PDA OAPSA - QA Case Inspection.rpt  
 Rev. 03/2019

An overview of a new weekly report and what is on the report.

**Weekly Quality Assurance Protective Services Case Inspection Report**  
**Review required to ensure compliance with state regulations**  
**Wabash County AAA**

Excludes records with PS activity within the past 7 days\* as of 2:21 pm on 3/12/2019  
 See end of report for details and instructions.

SAMS Report Location: Report Type: Administrative Title: PDA OAPSA - QA Case Inspection

**Agency's Total Active PS Care Enrollments** **78**

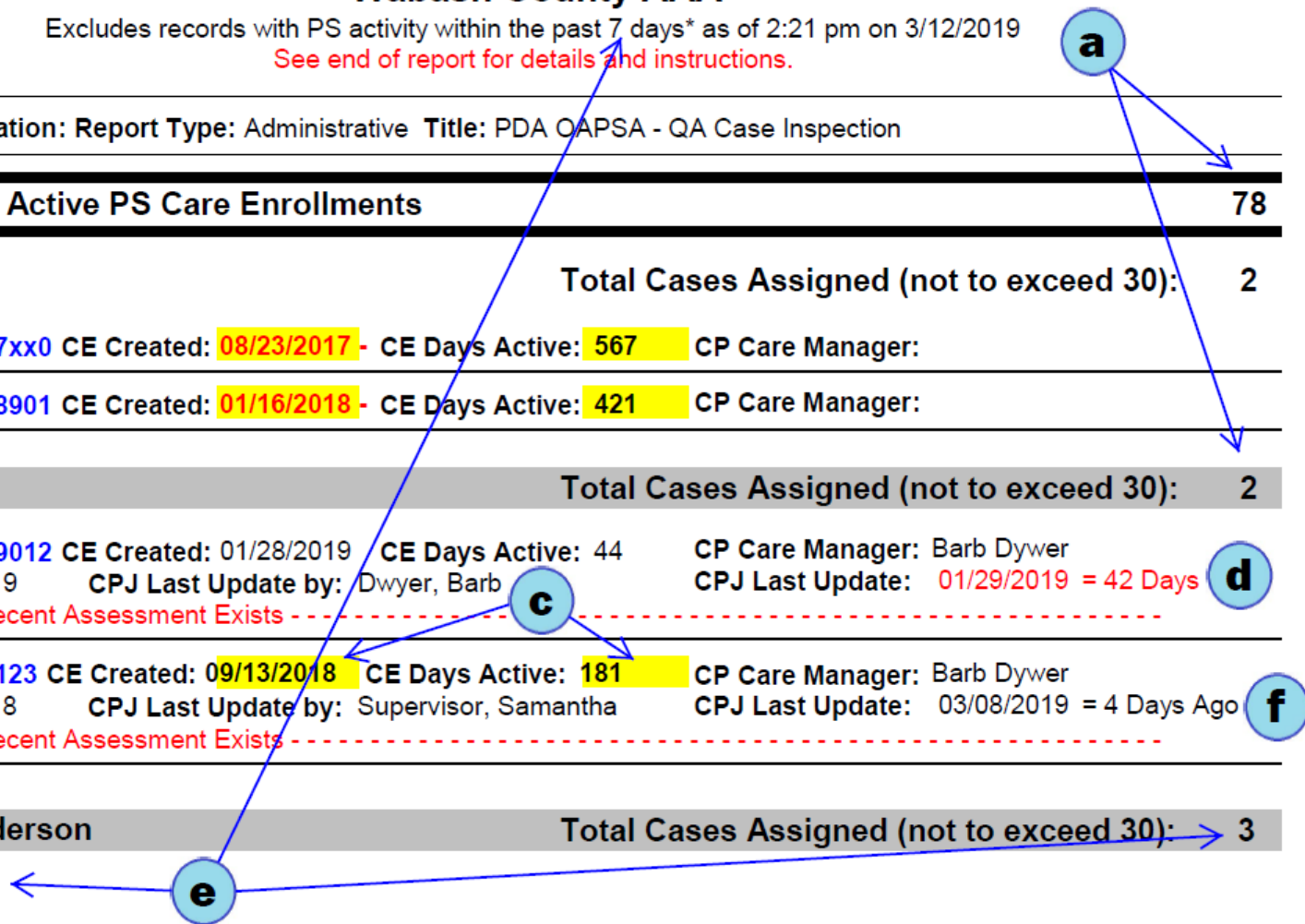
**b** **Total Cases Assigned (not to exceed 30): 2**  
 SAMS ID: 1234567xx0 CE Created: 08/23/2017 - CE Days Active: 567 CP Care Manager:  
 SAMS ID: 23xx678901 CE Created: 01/16/2018 - CE Days Active: 421 CP Care Manager:

**Barb Dwyer** **Total Cases Assigned (not to exceed 30): 2**  
 SAMS ID: 345xx89012 CE Created: 01/28/2019 CE Days Active: 44 CP Care Manager: Barb Dwyer  
 CP Start:01/28/2019 CPJ Last Update by: Dwyer, Barb CPJ Last Update: 01/29/2019 = 42 Days **d**  
 ISA Date: No Recent Assessment Exists - - - - - **c**

SAMS ID: 456xx0123 CE Created: 09/13/2018 CE Days Active: 181 CP Care Manager: Barb Dwyer  
 CP Start:09/13/2018 CPJ Last Update by: Supervisor, Samantha CPJ Last Update: 03/08/2019 = 4 Days Ago **f**  
 ISA Date: No Recent Assessment Exists - - - - -

**Thomas A. Anderson** **Total Cases Assigned (not to exceed 30): 3**

**Duane Pine** **Total Cases Assigned (not to exceed 30): 1**



gg

**Brock Lee**

**Total Cases Assigned (not to exceed 30): 35**

**SAMS ID:** 6xx912345 **CE Created:** 12/20/2018 **CE Days Active:** 83 **CP Care Manager:** Brock Lee  
**CP Start:** 12/20/2018 **CPJ Last Update by:** Lee, Brock **CPJ Last Update:** 03/12/2019 = 0 Days Ago  
**ISA Date:** No Recent Assessment Exists -----

**SAMS ID:** 1386xx781 **CE Created:** 01/28/2019 **CE Days Active:** 44 **CP Care Manager:** Brock Lee

h

**No Active CP**

**Total Cases Assigned (not to exceed 30): 2**

**SAMS ID:** 789012xx56 **CE Created:** 08/10/2018 **CE Days Active:** 215 **CP Care Manager:** No Active CP  
**Care Plan Start:** No Active Care Plan Exists -----  
**ISA Date:** 10/03/2018 **ISA Last Updatd by:** VaLorax, Barbara **ISA Last Update:** 12/26/2018 = 76 Days Ago

**SAMS ID:** 890123xx67 **CE Created:** 03/06/2019 **CE Days Active:** 7 **CP Care Manager:** No Active CP

i

**No Active CP**

**Total Cases Assigned (not to exceed 30): 2**

**SAMS ID:** 90xx345678 **CE Created:** 01/10/2019 **CE Days Active:** 62 **CP Care Manager:** No Primary CPCM  
**CP Start:** 01/10/2019 **CPJ Last Update by:** Rhodes, Dusty **CPJ Last Update:** 01/16/2019 = 55 Days Ago  
**ISA Date:** 01/10/2019 **ISA Last Updatd by:** Graw, Marty **ISA Last Update:** 01/11/2019 = 60 Days Ago

**SAMS ID:** 0123xx6789 **CE Created:** 01/28/2019 **CE Days Active:** 44 **CP Care Manager:** No Primary CPCM  
**CP Start:** 01/28/2019 **CPJ Last Update by:** Turner, Paige **CPJ Last Update:** 03/06/2019 = 6 Days Ago  
**ISA Date:** 01/28/2019 **ISA Last Updatd by:** Turner, Paige **ISA Last Update:** 03/06/2019 = 6 Days Ago



# Report Overview

- a) Total active cases for agency and caseworkers. Will include cases that are suppressed from the report (updated within X days).
- b) At the top of the report will appear any active PS Care Enrollments with an End Date in the past and no associated Care Plan or an inactive Care Plan.
- c) Yellow highlights indicate case is older than 60 days.
- d) Care Plan Journal (CPJ) or Investigation Summary & Assessment (ISA) dates in **red font** indicate no recent updates. The date and number of days since the last update is shown.
- e) Note at the top of this report it indicates that records updated within the past 7 days are excluded. This caseworker has no cases listed because all three were updated within the past 7 days (note the caseworker's caseload count still displays for suppressed records).

*Continued on next slide*



# Report Overview

- f) Care Plan Journal was updated 4 days ago, but this case is NOT suppressed because it is missing the ISA.
- g) Caseworkers highlighted in pink have exceeded the regulatory caseload limit of 30 cases.
- h) Cases without an active Care Plan. This may indicate an inactive or deleted Care Plan where the PS Care Enrollment was accidentally left in an active status.
- i) Cases with an active Care Plan, but no **Primary** Care Plan Care Manager is assigned to the Care Plan.

# Finding #3

**PDA is neither requiring, nor offering, sufficient training to adequately prepare AAA staff to properly categorize and investigate RONS.**

## Regulatory References

- § 15.121. Protective services staff qualifications.
- § 15.122. Protective services casework training curriculum.
- § 15.123. Protective services investigation training curriculum.
- § 15.124. Protective services intake training curriculum.
- § 15.125. Availability of training.
- § 15.126. Training evaluation.
- § 15.127. In-service training.

# Addressing Finding #3

- New Intake Worker Training curriculum being piloted currently by 6 AAAs:
  - Developed by PDA and Temple
  - Reviewed by AAAs – feedback incorporated
  - Covers all required content per the regulations
  - Includes a reference guide
  - Requires passing score of 80% on a competency evaluation
  - Also includes internal AAA training such as:
    - ✓ Review of AAA's approved annual plan
    - ✓ Ongoing supervision
    - ✓ Job shadowing
    - ✓ Etc.

*Continued on next slide . . .*

# Addressing Finding #3

- Beginning July 1, 2019, PS Investigators must pass a competency evaluation with 80% or better
- Increased enrichment (annual) training opportunities from 7 to 14
- Adding on-line training modules  
(content pending for posting on LTLTI website)
- Developed webinars for solicitors – broader audience, increased access  
(Go-live June and July 2019)
- Added Caroline Burnell to Temple staff for expertise in FE cases
- Enhanced, on-line and real-time access to training evaluations
- Added training for PDA staff to further support AAA needs

# Finding #4

PDA is not monitoring the AAAs as they categorize and investigate RONS.

## Addressing Finding #4

- Added No Need reviews and TA (ongoing)
- Monitoring letters now issued in a more timely manner
- Internal APD review/approval/release process was revised
- Dave Toth promoted to Director of Legislation & Policy
- Glenda Ebersole joined PDA as a Executive Policy Specialist
- Will incorporate active cases in QA monitoring through update of APD #17-24-01)

# Finding #5

PDA is not offering timely guidance to the AAAs on case management.

## Addressing Finding #5

- Active Cases Monitoring Tool:
  - ✓ APD #17-24-01 will be updated to accommodate real-time monitoring of active cases
- No Need review process continues
  - ✓ Currently, 17% of the reviewed RONs are changed by PDA (down from 30%)
  - ✓ Ongoing training on categorization continues

# Finding #6

PDA is not adequately staffing its own Protective Services Department.

## Addressing Finding #6

- Additional staff hired in PS Office (see Finding Four)
- Steve Rogers promoted to Director of Outreach & Education. Responsible for ensuring LTLTI training documents are up-to-date
- Communications will ensure PDA website is current
- PS Office hiring a NEW Supervisor position

# The OSIG's Recommendations

- 1) Review Intake Worker Training and update if needed **BEING PILOTED NOW**
- 2) Implement regular enrichment training for intake staff **SEE ABOVE**
- 3) Strengthen mandatory training requirements for investigators and supervisors **ONGOING**
- 4) Better ways to educate AAA staff within a reasonable timeframe after hire **TRAINING SUBCOMMITTEE CREATED WITH PDA, AAA'S AND P4A**
- 5) Consider viability of a centralized call center **ONGOING**
- 6) More closely monitor length of time cases remain open **DONE**

*Continued on next slide . . .*



# The OSIG's Recommendations

- 7) Real-time review of cases **ONGOING**
- 8) Address regulatory violations and provide TA until corrected **ONGOING**
- 9) Revise the cooperative agreement/contracts with the AAAs **BEING CONSIDERED FOR NEXT REVISIONS DUE IN 2020**
- 10) Increased training and monitoring to enhance consistency in categorization and investigation **ONGOING**
- 11) Establish best practices in categorization and investigation, and provide guidance to the AAAs to ensure compliance with the identified best practices **DONE AND ONGOING**
- 12) PDA hire additional staff and cross-train existing PDA staff to allow for increased monitoring and TA availability. **DONE AND ONGOING**

# ***WHERE TO REPORT:***

**Local Area Agency on Aging (AAA)**

**or**

**1-800-490-8505**





**Questions?**

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