

# MEMORANDUM

## TEXAS DEPARTMENT OF HUMAN SERVICES

**SUBJECT:** Community Care Policy Clarification CCAD 99006; CBA/HCSS 99013

**TO:**

Regional Directors  
Aged & Disabled Services

**FROM:**

Becky Beechinor  
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Long Term Care Services  
State Office W-511

**DATE:** April 16, 1999

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This is in response to a request for clarification of the Community Based Alternatives (CBA) Home and Community Support Services (HCSS) Compliance Monitoring Guide.

**Policy Question 1:**

If a HCSS agency maintains the original Form 3670, Documentation of Services Delivered, in their main office and maintains copies in their branch offices, is the reviewer allowed to read copies of the Form 3670 if the review is taking place in the branch office?

**Policy Response 1:**

No. The reviewer needs to see the original documents.

**Policy Question 2:**

For purposes of compliance monitoring, has a service break occurred if the attendant works fewer hours than scheduled? If so, what procedures are to be followed in compliance monitoring if an attendant:

- a. finishes all tasks earlier than scheduled or
- b. finishes all tasks earlier than scheduled and client sends them home or
- c. works a night shift and due to illness has to leave one hour early?

**Policy Response 2:**

These scenarios would not be considered a service break, as long as for every time period in which fewer hours than scheduled are delivered the following occurred:

- a. an HCSS agency RN was notified and a timely signature/date was obtained on the Form 2067 if it is a CBA case with delegated nursing tasks, or
- b. documentation substantiates the reason for the attendant working less hours and the client agreed to receiving less hours on a particular day.

**Policy Question 3:**

Form 3853, Evaluation Summary Totals

*Totals:* For Column A-D, add the numbers in the column and enter the total for each column

*Total Columns:* For Column E, % Met, add percentage in the column and divide by the number of standards rated.

Is this the correct calculation to figure Column E under Totals? Why is the calculation figured on number of standards rated instead of number of mets divided into number of mets and not mets (A divided by D x 100%) like each standard is figured under Column E?

**Policy Response 3:**

Yes, This is the correct calculation to figure Column E, because each standard is read for separately.

**Policy Question 4:**

HCSS compliance monitoring Standard 9 & 10 Adaptive Aids/Minor Home Compliance Summary Form Note states that even if a Form 2067 is sent with a valid reason, the standard is Not Met. If the delay was due to circumstances under the control of the provider agency, then the contract monitor needs to take appropriate action, but the standard is still not met. Why is standard marked "Not Met" instead of NA if F2067 is sent with a valid reason? Why would provider agency be given a "Not Met" if client requested that home modifications be delayed?

**Policy Response 4:**

The standard was set at 90% compliance to avoid the necessity of determining whether or not the reason for the delay was valid or within the provider's control. The individual standard is marked Not Met, in both cases, but the overall performance for the providers, for adaptive aids and minor home modifications would be in compliance if 90% of the instances in the sample were within the required time frame. This 10% allowance in the rules allows for those instances such as these examples, where the provider may not be able to meet the delivery time frames because of circumstances outside of their control.

**Policy Question 5:**

How is Standard 4(b) read since providers do not obtain signatures on F3671 attachments for routine changes prior to sending documents to the case manager?

**Policy Response 5:**

The reviewer should verify that the appropriate attachment is signed by the provider professional

If you have any questions regarding these clarifications, please contact your regional contract manager.

[signature on file]

Becky Beechinor

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