



pennsylvania

DEPARTMENT OF PUBLIC WELFARE

MAR - 9 2012

Ms. Karen Voegele
Executive Director
Community-Based Services
Inglis Foundation
2600 Belmont Avenue
Philadelphia, Pennsylvania 19131-2799

Dear Ms. Voegele:

I am enclosing the final report of the Inglis Foundation that was recently completed by this office. Your response has been incorporated into the final report and labeled as an Appendix.

I would like to extend my appreciation to all the courtesy extended to my staff during the course of fieldwork. I understand that you were especially helpful to Nyanquoi Jones in expediting the audit process.

The final report will be forwarded to the Department's Office of Developmental Programs (ODP) and the Office of Long Term Living (OLTL) to begin the Department's resolution process concerning the report contents. The staff from the ODP and/or OLTL may be in contact with you to follow-up on the action taken to comply with the report's recommendations.

If you have any questions concerning this matter, please contact David Bryan, Audit Resolution Section, at (717) 783-7217.

Sincerely,

Tina L Long

Tina L. Long, CPA
Director

Enclosure

c: Mr. Timothy Costa
Ms. Karen Deklinski
Ms. Bonnie Rose
Mr. Grant Witmer
Mr. Kevin Friel
MS. Vicki Stillman-Toomey
Mr. John Cox
Mr. Timothy O'Leary

Some information has been redacted from this audit report. The redaction is indicated by magic marker highlight. If you want to request an unredacted copy of this audit report, you should submit a written Right to Know Law (RTKL) request to DPW's RTKL Office. The request should identify the audit report and ask for an unredacted copy. The RTKL Office will consider your request and respond in accordance with the RTKL (65 P.S. §§ 67.101 et seq.). The DPW RTKL Office can be contacted by email at: ra-dpwtkl@pa.gov.



MAR - 9 2012

Mr. Timothy M. Costa
Executive Deputy Secretary
Department of Public Welfare
Health & Welfare Building, Room 333
Harrisburg, Pennsylvania 17120

Dear Mr. Costa:

The Bureau of Financial Operations (BFO) conducted a performance audit of the funding provided by the Office of Long Term Living (OLTL) and the Office of Developmental Programs (ODP) to Inglis Foundation and Inglis House (Inglis). The audit was directed to determine the basis and reasonableness of cost allocation; to determine the units of service delivered; and to determine the cost of service provided. Our audit examined the period from July 1, 2010 through June 30, 2011.

This report is currently in final form and therefore contains Inglis' views on the reported findings, conclusions and recommendations. Management's response to the draft report is included as an Appendix hereto. The reports contents were discussed at an exit conference held on February 24, 2012.

Executive Summary

Inglis Foundation is based in Philadelphia, Pennsylvania and is the parent corporation of Inglis House and several other entities that provide programs and services designed to enable people with physical and other disabilities to enjoy life with the greatest amount of independence and mobility. Inglis' operations include an adult day program with an average daily attendance of 24 participants, a skilled nursing facility with a capacity of 290 beds, a 208-unit affordable and wheelchair accessible housing, in-home care management provided to 80 individuals, community employment, and the Drink-Aide® adaptive water bottle, a patented bottle that attaches to wheel chairs.

The report findings and recommendations for corrective action are summarized below:

FINDINGS	SUMMARY
<p><i>Finding No. 1 – Samples Of Inglis' Adult Day Program Reimbursements And Their Underlying Documentation Found That 4.29% Of OLTL Claims And 5.17% Of ODP Claims Were In Error.</i></p>	<p>Statistically valid random samples were tested for adequacy of billing documentation. This testing revealed an error rate of 4.29% of OLTL and 5.17% of ODP claims. Extrapolating the OLTL and ODP error rates over the entire population of adult day program claims for the audit period results in a disallowance of \$12,834 and \$2,461 respectively.</p>

HIGHLIGHTS OF RECOMMENDATIONS

OLTL should :

- Recover the \$12,834 in overpayments from Inglis.

ODP should :

- Recover the \$2,461 in overpayments from Inglis.

Inglis should:

- Implement the necessary controls to ensure that all claims billed are adequately supported by proper time and attendance logs, written progress notes and other supporting documentation.

FINDINGS

SUMMARY

Finding No. 2 – Rates Paid For Adult Day Program Are Not Uniform And Vary On The Basis Of Funding Agency And Waiver.

Although all participants in the adult day program receive the same identical service, rates assigned to individuals vary between \$50 to \$151 per day depending on the funding agency (OLTL, ODP) and waiver (OBRA waiver, Independence waiver, PFDS waiver or Consolidated waiver).

HIGHLIGHTS OF RECOMMENDATIONS

OLTL and ODP should:

- Work towards a uniform rate setting where the procedure or service code is the same and service is identical.

FINDINGS

SUMMARY

Finding No. 3 – Copies Of Individual Support Plans (ISPs) Are Not Maintained In Some Of The Files Of Adult Day Program Participants.

A review of adult day program documentation revealed that ISPs are not maintained in individual participants' files.

HIGHLIGHTS OF RECOMMENDATIONS

OLTL and ODP should:

- Reinforce the requirement that ISPs be kept in the individuals' files.

Inglis should:

- Take the necessary steps to ensure that ISPs are maintained in the individual's file.

FINDINGS

SUMMARY

Finding No. 4 – Review Of Program Costs And Units Delivered Indicates That The Rates Paid For Supports Coordination Are Lower Than The Costs Incurred by Inglis And Some Rates Paid For The Adult Day Program Are High.

An average rate based on total expenses incurred and units of service delivered during the audit period was determined to be significantly lower than the current rate set for service coordination but higher than the rate set for the adult day program.

HIGHLIGHTS OF RECOMMENDATIONS

OLTL and ODP should:

- Review the rates for both supports coordination and adult day program.

Inglis should:

- Review supports coordination costs and program data to determine a specific reason(s) for the programs losses.

FINDINGS

SUMMARY

Finding No. 5 – Services Rendered Reports Were Signed By An Inglis Staff On Behalf Of Service Recipients.

An employee of Inglis signed the services rendered reports (MA 409s) for three recipients receiving non-medical transportation services.

HIGHLIGHTS OF RECOMMENDATIONS

Inglis should :

- Take the necessary step to ensure that individuals receiving services sign for the services received. In instances where an individual’s signature cannot be obtained due to physical or other challenges, the staff rendering the service should properly document the reason why a signature cannot be obtained.

FINDINGS

SUMMARY

Finding No. 6 – Inglis Staff Do Not Document In HCSIS That Personal Emergency Response (PERS) Devices Are Functional Prior To Paying Invoices.

Inglis’ staff do not document in HCSIS that PERS devices are in the possession of service recipients and are in working conditions prior to paying invoices submitted by the PERS service provider.

HIGHLIGHTS OF RECOMMENDATIONS

Inglis should :

- Require staff to verify with service recipients and document in HCSIS that PERS devices are in working conditions and are functional prior to paying invoices submitted by the PERS service provider.

Background

Inglis is a non-profit organization founded more than 134 years ago to serve individuals with physical and other disabilities. Its corporate office is located at 2600 Belmont Avenue in Philadelphia, Pennsylvania.

Inglis assists individuals with physical and other disabilities to acquire and maintain the highest possible level of independent living and mobility, considering each individual’s particular circumstances, by providing an array of services and products. These services and products include skilled nursing, adult day program, care management, community employment, wheelchair assessable housing, and the Drink-Aide® adaptive water bottle. Services are performed by Inglis’ employees in on-site and community settings.

Inglis serves individuals who are approved by the Pennsylvania Department of Public Welfare (DPW) through OLTL, ODP, and the Office of Medical Assistance Program (OMAP). Other funding agencies include the Pennsylvania Department of Aging (PDA), the Pennsylvania Department of Labor and Industries (L&I), the U.S. Department of Human Services (HHS), the U.S. Department of Housing and Urban Development (HUD), the U.S. Department of Veterans Affairs (VA), the Multiple Sclerosis Foundation, the Pennsylvania Institute for the Blind and Handicapped (PIBH) as well as funding from other private sources. This audit covered non-residential activities funded by DPW through OLTL and ODP.

Objective/Scope/Methodology

The audit objectives, developed in concurrence with OLTL and ODP were:

- To determine the basis and reasonableness of cost allocation.
- To determine the units of service delivered.
- To determine the cost of service provided.

In pursuing these objectives, the BFO made inquiries of OLTL and ODP personnel and interviewed Inglis' management. We also reviewed accounting records and conducted procedures to determine the basis and reasonableness of Inglis' cost allocation methods. Finally, we examined Provider Reimbursement and Operations Management Information System (PROMISe) reimbursement data, Home and Community Services Information System (HCSIS) electronic records, Services Rendered Reports (MA 409s), service recipients' time and attendance logs, third party invoices, and other pertinent data necessary to accomplish the audit objectives.

Government auditing standards require that we obtain an understanding of management controls that are relevant to the audit objectives described above. The applicable controls were examined to the extent necessary to provide reasonable assurance of the effectiveness of these controls. Based on our understanding of the controls, no material deficiencies came to our attention. Areas where we noted an opportunity for improvement in management controls are addressed in the findings of this report.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

The BFO's fieldwork was conducted from December 6, 2011 to December 22, 2011, and was performed in accordance with generally accepted government auditing standards. This report will be available for public inspection.

Results of Fieldwork

Finding No. 1 – Samples Of Inglis' Adult Day Program Reimbursements And Their Underlying Documentation Found That 4.29% Of OLTL Claims And 5.17% Of ODP Claims Were In Error.

Statistically valid random samples of the claims submitted were identified and tested to determine the adequacy of the existing documentation. We reviewed the adult day program participants' time and attendance logs and progress notes. We also identified the number of units authorized by the ISPs for the clients sampled and compared the allowable units to the units billed and reimbursed to confirm that the units billed did not exceed the units authorized. Authorizations for service were checked in HCSIS to verify that the services were approved for the individual recipients.

As a result of these comparisons we identified 4.29% of OLTL reimbursements and 5.17% of ODP reimbursements were not supported. In some instances, there were either no records of attendance available to support the claims billed or where records existed, the total units billed exceeded the units documented in the attendance records.

The OLTL and ODP error rates were extrapolated over the entire population of their associated adult day program claims reimbursed for the audit period resulting in a disallowance of \$12,834 and \$2,461 respectively.

Recommendation

The BFO recommends that OLTL and ODP recover the \$12,834 and \$2,461 respectively.

The BFO also recommends that Inglis implement the necessary controls to ensure that all claims billed are adequately supported by proper time and attendance logs, written progress notes and other supporting documentation.

Finding No. 2 – Rates Paid For Adult Day Program Are Not Uniform And Vary On The Basis Of Funding Agency And Waiver.

Inglis operates an on-site adult day program that provides social, educational, therapeutic, and wellness activities for individuals ages 18 and older. The adult day program also provides an opportunity for family members and caregivers to have more time to tend to other responsibilities while participants are in attendance at the program.

The adult day program at Inglis is funded through the OLTL, ODP, PDA, VA and private sources. OLTL participants are funded under the OBRA Waiver which pays a rate of \$50 per day and Independence Waiver which pays a rate of \$4.71 per 15 minutes (or \$151 per day based on an 8 hour per day attendance). ODP participants are funded under the PFDS and Consolidated Waivers which pays a rate of \$2.88 per 15 minutes (or \$92.16 per day based on an 8 hour per day attendance).¹

¹ Effective November 15, 2011, ODP reduced Inglis' adult day program rate to \$2.12

For the 2010/2011 fiscal period the adult day program revenue exceed expenses by \$113,506 or 25%. Since the adult day program participants receive the same identical service from the same Inglis staff, OLTL and ODP can attain cost-savings by working towards a more uniform rate setting.

Recommendation

The BFO recommends that OLTL and ODP work towards a uniform rate setting where the procedure or service code and service provider are the same and service is identical.

Finding No. 3 – Copies Of Individual Support Plans (ISPs) Are Not Maintained In Some Of The Files Of Adult Day Program Participants.

A review of adult day program documentation revealed that some of the files for the individuals attending the program did not contain a complete ISP. Management informed us that some of the supports coordination entities are providing only the portion of the ISP that relates to the adult day program. Considering that the ISP contains critical information on the individual's goals, the nature of the services an individual is approved for, the quantity of units authorized, the approved service provider, the emergency and demographic information and the duration of the service authorization, we believe a completed copy of the document should be included in the individuals file.

In order to attain greater assurance of accuracy and quality of care, Inglis' staff must have access to and awareness of the complete contents of the ISPs for individuals that they serve. Both OLTL and ODP management indicated that the ISP should be available within an individual's file to fulfill this mandate.

Recommendation

The BFO recommends that Inglis should take the necessary steps to ensure that ISPs are maintained in the individual's file.

The BFO also recommends that OLTL and ODP reinforce to all providers the requirement that the ISPs be kept in the individuals' files.

Finding No. 4 – Review Of Program Costs And Units Delivered Indicates That The Rates Paid For Supports Coordination Are Lower than The Costs Incurred By Inglis And Some Rates Paid For The Adult Day Program Are High.

Our audit examined the total costs incurred in relations to the units of service delivered and reimbursed for both supports coordination and adult day program activities.

Supports Coordination

OLTL rates for supports coordination vary based on the waiver an individual is funded through. For an individual served through the OBRA waiver, Inglis may bill one unit per week at a rate of \$63.45 per unit. The Independence waiver allows units to be billed based on actual service time. One unit is equal to an hour of service time and is billed at a rate of \$22.89.

Inglis Foundation and Inglis House
July 1, 2010 to June 30, 2011

Inglis average cost per unit is \$136. For the fiscal period 2010/2011 the supports coordination program incurred a loss of \$311,020 or 58%. The audit process did not analyze why this significant loss occurred. However, we believe that the limited number of individuals served in this program is a factor. The program may not be sustaining the economies of scale that larger programs benefit from. Inglis' management should review program data (unit cost) and compare this data to other supports coordination programs.

Adult Day Program

We determined the average rate for adult day program to range between \$2.32 and \$2.75 per 15 minutes. The range is based on the assumption that an individual's attendance is between six to eight hours on any given day. The rates for adult day program vary by OLTL and ODP participants at \$4.71 per 15 minutes and \$2.88 per 15 minutes respectively.² As indicated above the adult day program's revenue exceed expenses by \$113,506.

Recommendation

The BFO recommends Inglis' management review supports coordination costs and program data to determine a specific reason(s) for the programs losses.

The BFO recommends that OLTL and ODP review the rates for both supports coordination and adult day program.

Finding No. 5 – Services Rendered Reports Were Signed By An Inglis Staff On Behalf Of Service Recipients.

An employee of Inglis signed the services rendered reports (MA 409s) for three individuals receiving non-medical transportation services. MA 409s are official forms used to document services rendered which require validations through signatures of the staff rendering the service and the individual receiving the service.

Staff should not sign an official document on behalf of a service recipient as it could be unlawful and the act provides little assurance that the service was provided. It is reasonable to expect that in some situations an individual may not have the capacity to sign due to physical disability or other limitations. In such situations, staff should request the signatures of family members or individual's representatives where possible and document why the individual recipient's signature cannot be obtained.

Recommendation

The BFO recommends that Inglis take the necessary step to ensure that individuals receiving services sign for the services received. In instances where an individual's signature cannot be obtained due to physical or other challenges, the staff rendering the service should properly document the reason why a signature cannot be obtained.

² Effective November 15, 2011, ODP reduced Inglis' adult day program rate to \$2.12

Finding No. 6 – Inglis Staff Do Not Document In HCSIS That Personal Emergency Response (PERS) Devices Are Functional Prior To Paying Invoices.

Inglis' staff do not document in HCSIS that PERS devices are in the possession of the recipients and are functioning prior to making payment on the invoices submitted by [REDACTED] the third party service provider. PERS are electronic pendant style help buttons that transmit calls for help in the event of a life threatening emergency. [REDACTED] submits a monthly invoice and Inglis pays the invoice and bills OLTL for the invoiced amount.

The current approval process only confirms that a PERS device was provided to the recipient but provides no verification that the unit is still in the recipient's possession. The verification of continued service should not be placed solely on the third party vendor.

Recommendation

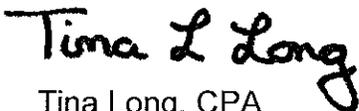
The BFO recommends that Inglis should require its staff to verify with service recipients and document in HCSIS that PERS devices are in working conditions and are functional prior to paying invoices submitted by the PERS service provider. This verification should occur at a minimum during the required quarterly individual contacts.

Exit Conference/Conclusion

An audit exit conference was held on February 24, 2012. The reports contents were discussed to the level necessary for a mutual understanding of both parties' positions. As a result no changes were made to the draft audit report.

In accordance with our established procedures, an audit response matrix will be provided to OLTL and ODP. The OLTL and ODP will be responsible for completing the matrix and forwarding it to the DPW Audit Resolution Section within 60 days. The response to each recommendation should indicate OLTL's and/or ODP's concurrence or non-concurrence, the corrective action to be taken, the staff responsible for the corrective action, the expected date that the corrective action will be completed, and any related comments.

Sincerely,



Tina Long, CPA
Director

- c: Ms. Karen Voegele
Ms. Karen Deklinski
Ms. Bonnie Rose
Mr. Grant Witmer
Mr. Kevin Friel
MS. Vicki Stillman-Toomey
Mr. John Cox
Mr. Timothy O'Leary

**INGLIS FOUNDATION AND INGLIS HOUSE
RESPONSE TO THE DRAFT REPORT**

APPENDIX



2600 Belmont Avenue
Philadelphia, PA 19131

February 17, 2012

Mr. Daniel Higgins, Audit Manager
Division of Audit and Review
Bureau of Financial Operations
Department of Public Welfare
801 Market Street, Suite 5040
Philadelphia, PA 19107-3126

RE: Inglis response to draft performance audit report

Dear Mr. Higgins,

Please accept the enclosed documents as Inglis' response to the audit report prepared by the Division of Audit and Review for the audit conducted during December 2, 2011 – December 22, 2011.

As you are aware, Inglis has requested an exit conference with the Division of Audit and Review, which has been scheduled for February 24, 2012 at 9:30 AM at Inglis.

Please feel free to call in advance of the exit conference should you have any questions.

Sincerely,

A handwritten signature in cursive script that reads 'Karen Voegelé'.

Karen Voegelé MSW, LSW
Executive Director, Community Based Services

Enclosure

Cc: Diane Dobbins, Director of Business Office
Carol Jones, Director of Care Management
Nicole Pruitt, Program Manager of Adult Day

Inglis Foundation/Inglis House:

Response to draft performance audit prepared by the Division of Audit & Review

Finding 1:

Samples of Inglis' Adult Day Program reimbursements and their underlying documentation found that 4.29% of OLTL claims and 5.17% of ODP claims were in error.

DAR Recommendation:

Inglis should implement the necessary controls to ensure that all claims billed are adequately supported by proper time and attendance logs, written progress notes and other supporting documentation.

Inglis Response:

- As discussed during the on-site phase of the DAR, The [REDACTED] the consulting firm that handled Inglis' billing during the period of time under review, incorrectly believed that participants in the Independence Waiver were billed on a per day basis, not a per unit basis. As a result, a sign-in or a sign-out entry was viewed by the [REDACTED] as sufficient to establish the participants' attendance.

The [REDACTED] became aware of their error after the July 2010 billing, and corrected their method of billing before the August 2010 bills were submitted. The audit findings support this. The only significant discrepancies identified were for three participants [REDACTED], and the discrepancies were confined to the month of July 2010. Therefore, we believe that the data for these individuals should be excluded when calculating and extrapolating the error rate over the entire Adult Day OLTL claims population for the fiscal year under review.

Inglis contacted the Para transit provider [REDACTED] on three separate occasions since the start of the DAR review to obtain the arrival or departure times for these three participants. Unfortunately, [REDACTED] was unable to provide Inglis with the arrival and departure times for the participants in question. Ms. [REDACTED], in [REDACTED] Customer Service, stated that they no longer use the same software system that was used in July of 2010 and that all information from the system in place at that time has been purged.

- Inglis has taken several measures to improve our internal processes for billing including:
 - Discontinued the contractual relationship with The [REDACTED] who was providing billing support for the Inglis Adult Day Program. Billing, and related business office activities, is managed internally since July 2011.
 - Ordered electronic card reader so that participants arrivals and departures will be tracked electronically using a bar code on their Inglis identification cards.
 - Enhanced internal controls for monitoring participant utilization of approved units for adult day/respite services as well as supporting documentation.

Finding 2:

Rates paid for the Inglis Adult Day Program are not uniform and vary on the basis of funding agency and waiver.

No response from Inglis required

Inglis Foundation/Inglis House:

Response to draft performance audit prepared by the Division of Audit & Review

Finding 3:

Copies of Individual Support Plans (ISPs) are not maintained in some of the files of Adult Day Program participants.

DAR Recommendation:

Inglis should take the necessary steps to ensure that ISPs are maintained in the individual's file.

Inglis Response:

- As discussed during the DAR review, as a provider of services, Inglis Adult Day Program staff do not have the required permission/rights for electronic access of the complete Individual Support Plan in HCSIS, and therefore we have been unable to independently retrieve this information from the system. Inglis Adult Day Program is dependent upon the numerous Supports Coordination agencies with whom our participants engage to provide hard copies of the ISPs.
- Inglis has implemented measures to obtain copies of the ISPs from Supports Coordination agencies, identified below, however will continue to be at the mercy of the Supports Coordination agencies for supplying the document until such time that providers are granted rights to the document in HCSIS.
 - A letter has been sent to the Supports Coordinators for every Adult Day participant requesting copies of the ISPs. This letter will be sent annually at the beginning of the service authorization period.
 - Contact will be made by phone with Supports Coordinators and/or their supervisors who do not respond to the written request for the ISP.

Finding 4:

Review of program costs and units delivered indicates that the rates paid for Supports Coordination are not covering Inglis' costs and some rates paid for the Adult Day Program are high.

DAR recommendation:

Inglis should review supports coordination costs and program data to determine specific reasons for the program losses.

Inglis Response:

- Inglis' annual operating budget, including revenue and expenses, is based on a number of factors including:
 - The Inglis Mission: *Inglis enables people with disabilities – and those who care for them – to achieve their goals and live life to the fullest.* Inglis provides care and services to a low income, underserved population that has limited resources.
 - Revenue Sources including reimbursement for Supports Coordination services under the Independence and OBRA waivers.
 - The skill level of staff - Inglis has historically employed staff skilled to address the complexity of care and services needed for a population of young people with physical disabilities.

Inglis Foundation/Inglis House:

Response to draft performance audit prepared by the Division of Audit & Review

- o Infrastructure and internal resources needed to provide quality care and services including Business Office, Compliance and Quality Management services, and technology services for the maintenance and support of hard- and software. These resources support the staff and consumers being served through the Independence and OBRA waivers.
- Inglis has been providing Supports Coordination for Independence and OBRA Waivers since 2007. Inglis was the first organization to provide Supports Coordination other than enrollment agencies. At that time, Inglis' supports coordination rates were set artificially low based upon two pieces of misinformation that Inglis received including:
 - o Statements that there was a rate limit on amount that could be requested.
 - o Statements that fees could be added to "pass through" services to cover cost of processing Transportation, Personal Emergency Response Systems, Environmental Modifications and Assistive Technology/DME services on a monthly basis.

Since 2007, new Supports Coordination providers have enrolled as waiver providers at rates higher than the limit imposed on Inglis. Based on this information, Inglis requested rate increases in February 2009 which were denied.

In December 2009, Inglis met with the Deputy Secretary of Aging and Deputy Secretary of OLTL to request again a rate increase. Data was presented to show a substantial increase in revenue if we were moved to the average rate of other supports coordination providers (See attachment dated 12/23/2009). The request for a rate increase was denied with an additional response that all waiver rates were going to be reviewed by OLTL.

- During the spring of 2011, Supports Coordination Providers from across the State participated in 5 meetings over 3 months with State officials including David Gingerich, Policy Advisor and consultants to develop a single rate for Supports Coordination across all CSPPPD waivers.

Providers presented detailed financial data and agreement was reached on a tentative rate, approximately \$60/hour, to be effective 7/1/11. This new rate included productive and non-productive time, it covered a broad range of new activities and tasks required of Supports Coordination providers as of October 2010, and supported the increased credentialing requirements for staff. The final issue to be addressed was the administrative costs of providing pass through services. To date there has been no final rate determination made and Inglis continues to receive reimbursement for supports coordination at the lowest rate in the region.

- Inglis' continues to appeal to OLTL for an increase in our Independence and OBRA supports coordination rates.

Finding 5:

Services rendered reports were signed by an Inglis staff on behalf of service recipients.

DAR Recommendation:

Inglis should take the necessary steps to ensure that individuals receiving services sign for the services rendered. In instances where an individual's signature cannot be obtained due to physical or other challenges, the staff rendering the service should properly document the

Inglis Foundation/Inglis House:

Response to draft performance audit prepared by the Division of Audit & Review

reason why a signature cannot be obtained.

Inglis Response:

- Inglis implemented the following process in the event that a consumer is unable to sign the Services Rendered Report:
 - The consumer identifies and approves a person who can sign on their behalf (this person cannot be an Inglis staff member).
 - Authorized person signs consumer's name and initials or signs his/her name underneath consumer's signature on the Services Rendered Report.
 - Consumers may also use a signature stamp to sign.
 - Should the above not be available at the time services are rendered, the staff person will document in the record why the consumer's or authorized person's signature could not be obtained.
 - Reeducate Inglis Supports Coordinators regarding the process to obtain signatures in the event that consumers are unable to sign, including the process to purchase signature stamps using assistive technology benefits.
 - Include the review of signatures on Services Rendered Reports in the existing internal audit process.

Finding 6:

Inglis staff do not document in HCSIS that Personal Emergency Response (PERS) devices are functional prior to paying invoices.

DAR Recommendation:

Inglis should require staff to verify with service recipients and document in HCSIS that PERS devices are in working condition and are functional prior to paying invoices submitted by the PERS service provider.

Inglis Response:

- Inglis was not previously made aware of the requirement to document in HCSIS that PERS devices were in the possession of consumers and in working order prior to paying invoices. Inglis agrees that implementing this inquiry and subsequent documentation is a worthwhile quality improvement initiative and as a result have implemented the following measures:
 - Effective immediately, Supports Coordinators will inquire about the functionality of the PERS unit, at a minimum, on a quarterly basis and document the status in the consumer's HCSIS record.
 - Supports Coordinators will inform consumers verbally and in writing of their responsibility to report technical problems with their PERS to the vendor, report unresolved technical problems to their Supports Coordinator and to contact the Supports Coordinator if services are no longer needed.



Meeting With

Deputy Secretary of OLTL, Jen Burnett and Deputy Secretary of Department of Aging, Ray Prushnok

Inglis Foundation, a Supports Coordinator for Independence and OBRA waivers since 2007, is requesting a rate increase to cover the cost of our services, including the cost of providing "pass through" services. One of the region's first Supports Coordination providers, Inglis Care Management was established shortly after Liberty Resources Incorporation (LRI) to cover Philadelphia and the surrounding counties. Inglis' initial rates were set artificially low in 2007 based upon several pieces of misinformation that Inglis received at the time including:

- Statements that there was a rate limit on amount that could be requested.
- Statements that fees could be added to "pass through" services to cover cost of processing Transportation, Personal Emergency Response Systems, Environmental Modifications and Assistive Technology/DME services on a monthly basis.

As a result, our OBRA rates are the lowest in the region and our Independence rates are well below

Rates	\$	Actual FY 09 OBRA Hours	Revenue \$	Difference (Incremental cost to State) \$
Current Inglis Rate (Lowest)	63.45	616	39,085.20	
2nd Low	74.00	616	45,584.00	6,498.80
Average -Inglis request	90.00	616	55,440.00	16,354.80
Highest	150.00	616	92,400.00	53,314.80

average (see charts left and below). This has resulted in annual losses for Inglis Care Management which in FY 2009 totaled \$404,000. In fact, Inglis waiver revenue has never covered the cost of its services.

The Inglis Foundation has a long standing

reputation as a skilled provider of care and service for people with disabilities. Since 2002, we have the gained trust of consumers, families and providers as a community based care management provider for people with disabilities living independently in the community. 92% of the consumers in our current waiver caseload were referred to us as a result of our outreach. Only 8% were referred to us from waiver enrollment agencies. Currently, we have 59 waiver consumers and 15 pending transfer to Inglis Foundation for Supports Coordination. Our total current caseload is over 200 community consumers.

Our Supports Coordinators are Masters degree prepared and have certification in Care /Case Management. We have several business lines in addition to Supports Coordination for CSPPPD waivers. Through a partnership with National Multiple Sclerosis Society, we provide community based care management for their complex cases. We also provide service coordination for people living in accessible housing units. These business lines allow us to assist consumers while they are waiting for

waiver enrollment. 75% of the consumers that are referred to us have no funding source in place until they become enrolled in a CSPPPD waiver.

Over the past two years, new Supports Coordination providers have been enrolled as waiver providers at rates higher than the limit imposed on Inglis Foundation. Based on this information, we requested rate increases in February 2009 and were denied. Our current

rates do not allow us to sustain our program. We need to have our rates increased as requested in February to enable us to continue to provide services.

Rates	\$	Actual FY 09 Independence Hours	Revenue \$	Difference (Incremental Cost to State) \$
Current Inglis Rate (2nd Lowest)	22.89	437	10,003.08	
Low	21.00	437	9,177.00	-826.08
Average	23.36	437	10,051.00	47.92
High	25.00	437	10,925.00	921.92
Inglis Request	32.89	437	14,372.00	4,368.92

FY 09 "Pass Through" Services	# Of Services	Costs \$
Transportation	197	26,930.75
Environmental Modifications	3	9,387.50
Personal Emergency Response System	187	6,990.22
Assistive Technology	5	987.33
Other	1	1,500.00

Using FY 2009 utilization statistics, the tables below show the incremental cost to the state if we were reimbursed at the rates requested. OBRA rates of the 12 providers range from \$63.45 (Inglis rate is lowest) to \$150.

Independence rates of the 8 providers range from \$21.00 to \$25.00 (Inglis rate is 2nd lowest @ 22.89).

Finally, the "Pass Through" table shows \$47,986 in administrative costs provided in FY 2009 for which Inglis was not reimbursed for expenses.

In addition to achieving more equitable rates, Inglis is exploring additional partnerships throughout the region. In particular, we seek to partner with you and your offices to utilize our

expertise toward improving the services provided to waiver consumers while reducing costs for the state. For instance, can we work with QMET around improving hospitalization and emergency utilization? Can we work with your offices and the NMSS to improve the care of consumers with Multiple Sclerosis, our most prevalent diagnosis?