Procedures for Risk Assessments, Mitigation, Monitoring and Documentation

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Definitions of risk levels used in risk assessments

High risk

An identified concern, that without mitigation, is likely to cause the individual to experience substantial injury or loss within the next 30 days or the individual has experienced substantial harm within the previous 30 days, and the harm will likely recur without mitigation.

Substantial injury or loss: Urgent medical intervention (hospital, Emergency room, doctor's office) necessary to treat the injury or prevent significant health deterioration or loss of functioning, and/or, law enforcement involvement, loss of housing or financial loss exceeding $2,000.

Medium risk

An identified concern, that without mitigation, is likely to cause the individual to experience minor injury or loss within the next 90 days or has experienced minor loss in the previous 30 days that will likely recur or worsen without mitigation.

Minor injury or loss: Medical intervention is not needed (ex., the issue can be addressed through natural supports, home remedy/over the counter, or time heals), housing is secure, and/or financial losses would be $2,000 or less.

Low risk

An identified concern, that without mitigation, may result in harm. The risk of harm to the individual is not imminent nor likely to occur within 90 days, and/or harm has occurred within the last 30 days, has been mitigated, and is unlikely to recur within 90 days.

Harm: Injury or loss of any severity.

No risk

There are no identified concerns, and no harm is likely to occur within 90 days, and there has been no harm in the previous 30 days.

A “no risk” determination should rarely be assigned for individuals assessed at a nursing facility level of care (SPL 1–13). Even when risks are mitigated through services or supports, some level of risk typically remains. “no risk” may be appropriate only for highly independent individuals receiving EWE or SPPC services. In most situations, “low risk” is the more appropriate designation, particularly when services support housing stability or other ongoing needs.

Power outages, natural disasters, or extreme weather

Risk definitions do not include events such as power outages, natural disasters or extreme weather. Risk information for these concerns may be pulled from the CAPS 2 Emergency Concerns report.

Overview of expectations for case managers in risk management for in-home individuals

CA/PS risk assessment tool in Oregon ACCESS (OA)

Use the CA/PS risk assessment tool in the client details section of OA, identify potential risks during the in-home assessment process for all consumers receiving waivered in-home services. For each identified risk, assess the consumer's risk level by using the high, medium, low and no risk definitions.

Mitigation plan

Create a person-centered risk mitigation plan with the consumer to identify mitigation strategies to lower all identified high, medium, or low risks. Choose at least one action item from the "risk reducing factor" column for each risk category. Mitigation strategies for high and medium-risk consumers may include multiple options from this column for some risk categories.

To update an existing risk assessment, click "modify" to add new information. Previous documentation will not be deleted but will remain in the system for historical record.

High or medium risk

If the individual is assessed as a high or medium risk in any category, the case manager must work with the individual to develop a mitigation plan to help reduce the assessed level of risk. The plan must be documented, including the individual's agreement to the plan and include any updates as needed. The individual may also choose not to participate in any mitigation plan, which also must be documented.

Mitigation plan implementation

Determine if the individual's mitigation plan is being implemented (if one was required) to lower identified risk(s). Provide additional assistance to strengthen the mitigation plan as needed.

Backup plans

All risk assessments (even those with no high or medium risks identified) must document an agreed upon, backup plan for emergency situations or if a scheduled provider is suddenly unavailable. The backup plan must include the name and contact information of the backup individual(s) who live close enough to the individual to provide urgent assistance. If applicable, document if an individual chooses not to have a backup plan or is unable to identify a contact to provide backup assistance.

Risk assessment comment

Provide brief comments for all high and medium risks identified and include the following in the plan mitigation comment box:

1. A brief description of identified high and medium-risks.
2. Details of the mitigation strategies being implemented to lower these risks.
3. The individual's understanding of the plan.
4. Name and contact information of the individual's supports in the mitigation plan if applicable.
5. Document a backup plan if the existing paid supports or assistive devices are suddenly unavailable (including names, contact information, specific ways support will be given).

Monitor the risk mitigation plan

Determine the effectiveness of the mitigation strategies used. Modify and adjust risk mitigation strategies as needed and to support the risk-lowering efforts of the individual. The frequency of direct contacts is determined by the number and level of risks identified. Update current information on the individual's risk concerns and mitigation/monitoring efforts in the risk assessment as needed.

Case narration

Provide case narration to indicate that a risk mitigation/monitoring direct contact is completed. A template, which may be found in the Risk Assessment page in APD CM Tools, is provided to help APD/AAA staff to meet the narration requirements.

Revision of service plan

Revise the service plan as necessary. When an identified risk level changes or a new risk is identified, modify the risk assessment information on the risk assessment tool page and record changes and update narration in the plan mitigation comments box. Continue to monitor and revise the service plan over time for accuracy and effectiveness.

Case management risk monitoring requirements

One or more high risk(s): risk-focused monthly direct contacts

The individual's high risk concerns and mitigation strategies must be discussed with the individual during monthly direct contacts. Risk-focused direct contact requirements are indicated in the CM Services Due report.

No high risk: risk-focused quarterly direct contacts

In-home individuals not assessed with any high-risk concerns must also receive risk-focused direct contact at least once a quarter. These direct contacts should include ongoing risk monitoring for changes in the individual's current risk assessment. This includes individuals with no identified risks on their current risk assessment.

Considerations

If an individual is rated "high risk" in both predicted outcome and harm intervention, they must be classified as "high risk" overall. In these cases, monthly case manager risk-focused contacts are required, even if the 30-day look back period has not been fully met.

Staff must use their professional judgment when determining "high risk" related to financial or material loss.

During a risk mitigation/monitoring direct contact service

Use the following to guide the conversation and documentation:

- Have a conversation with the individual to assess new risks (and any other changes that might impact the individual's assessed risk needs.
- Is the plan being implemented and identified risk(s) lowered? Follow up on previously assessed risk concerns and review the effectiveness of their current mitigation plan.
- What additional support or resources could be accessed to lessen risks and support the mitigation efforts of the individual?
- Review the individual's current back-up plan to ensure that the contact information is still current. A backup plan must be reviewed and documented, even if there is no assessed high or medium risk identified.

- Offer additional support and risk-lowering strategies.

Note: An individual or caregiver indicating everything is "fine" or "going well" does not constitute a required risk assessment contact.

Diagram of person-centered risk mitigation and monitoring

Person-centered risk management process

The risk assessment tool of the CA/PS client details and OA system notifications and reports

Case managers are strongly encouraged to enter identified risks, risk reducing factors, and narration related to risk mitigation strategies directly in the risk assessment tool page of the client details section of CA/PS. The following reports guide staff in the risk mitigation and monitoring process:

CM Services Due report

The CM Services Due report indicates if a direct contact is needed during the month and if the risk-focused direct contact is needed for risk monitoring/mitigation purposes. On the report, the column CM/risk shows "CM" if the required contact addresses other service plan needs. The column shows the word "risk" if an individual is assessed as high-risk and a risk-focused direct contact is needed for risk mitigation purposes, or the person does not have a high-risk need but has not had a risk monitoring contact during the quarter.

Consumers identified with high risk(s) report

The Consumers Identified with High Risk(s) report is located in the report description list (after the CM Services Due report and before the Copy and Create Management reports tab in OA). This report identifies individuals assessed with high risks in one or more risk categories of a completed risk assessment.

The CA/PS system required order for service planning

An individual's assessment for in-home and Community Based Care (CBC) CA/PS service benefit types includes the SPL (Title XIX) assessment, client details information and the required risk assessment and the individual's service plan. This order is important as the CA/PS risk assessment must link to the most current CA/PS SPL assessment. The graphic below outlines the required assessment order in CA/PS:

1. First Step: SPL Assessment
2. Second Step: Risk Assessment in Client Details
3. Third Step: Individual's Service Plan

The CA/PS 2 Emergency Concerns report

If an individual is assessed as high-risk in the power outages, natural disasters/extreme weather categories, this information is carried over to the "CA/PS 2 Emergency Concerns" report (no other risk factors are carried over to this report). Individuals with these high-risks are not required to have monthly risk-focused direct contacts. However, their risk concerns should be recorded in the risk mitigation comment box and pertinent information should be included as part of their backup plan.

Documentation requirements

If a high-risk level is selected for power outages or natural disasters/extreme weather, it is important to clearly document in narration or in the plan mitigation comments what preparations are in place for the high-risk individual in the event of a power outage and/or natural disaster/extreme weather.

Backup plan expectations

The plan mitigation comments must reference an individual's backup plan that describes what the emergency plan is, who living in proximity will be assisting the individual, their contact information, and how that assistance will be provided. If no Backup Plan is in place, define what assistance the department will need to provide and how that assistance will be delivered.

CBC and nursing facility risk assessment requirements

If a case manager identifies a high-risk concern for individuals in CBC settings and captures this concern in the risk assessment tool, these individuals will appear on the Consumers with High Risk(s) report, however, only the service type “CM” will show on the CM Services Due report.

Facility responsibility for case management

CBC and nursing facilities are responsible for ensuring that individuals residing in these settings have a risk management and contingency plan in place for emergencies (OAR 411-054-0034(5)(m) and OAR 411-054-0036(6)).

Case manager documentation options

Limited risk assessments are still required for individuals living in community-based care (CBC) settings, even though the facility assumes responsibility for managing identified risks. There is no need to complete a risk assessment if an individual is residing in a nursing facility.

There are two ways to complete a risk assessment for individuals living in a community-based setting:

Option 1: Go through each risk category and select “none” as the risk level, regardless of whether a risk is present. In the risk comment box, document the name of the facility and note that the facility assumes responsibility for all risks associated with the service plan, and will be providing a backup plan.

Option 2: Identify any applicable risks in each category, assign the appropriate risk level, and select the risk-reducing factor(s) as “facility responsibility.” In the risk comment box, document the name of the facility and note that the facility assumes responsibility for all risks associated with the service plan, and will be providing a backup plan.

Additionally, for whichever option is used, if you come across any concerning indicators as it relates to the individual living in the CBC, also note this in the risk comment box.

Examples of risk mitigation and monitoring

- The individual is struggling to pay the rent and may be facing eviction soon. The CM provided low-income housing resources and community resources for the individual to follow-up on. CM encourages the individual to contact ADRC to learn about potential resources in their community. CM provides risk mitigation/monitoring with the individual to see if they checked in with the resources previously identified or if they need additional assistance.
- The individual lives in a home with several structural concerns, however the individual specifically said that he does not want to leave the home. CM provides risk monitoring by reviewing the concerns previously noted and continues to see if the individual still wishes to stay in their home or if he wants help to find a new place to live. CM encourages the individual to contact the ADRC to investigate what support and resources are available. CM provides list of community-based resources that could assist with needed home repairs.
- No specific risks have been identified in the risk assessment, and the individual cannot identify a contact person for the backup plan. This CM provides ongoing risk monitoring by talking with the individual about who would be the best individual to contact if their current provider is suddenly unavailable. When identified, the CM recorded the name of the individual, their contact information, and ways they can provide assistance in the plan mitigation comment box.

- The individual sits in a recliner most of the time, however she is unable to transfer out of it to use the bathroom. The CM looks at helping the individual with getting a lift chair and an emergency response system set up through the K State Plan and suggests changing the HCW's schedule to provide better availability when assistance is needed. CM provides risk mitigation/monitoring by seeing how the new lift chair is working out, if an ERS is in place, and if she was successful in changing the HCW schedule.

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