

CCS RISK MANAGEMENT PLAN FOR CY 2019-2022

Community Care Solutions, Inc. under the direction of Executive Director Anice Butler, LCSW-BACS prepared the 2019 Plan. This document was presented and approved by the CCS Leadership on January 2, 2019, and the CCS Performance Improvement Committee on January 2, 2019. The CCS Client Rights Committee reviewed and approved January 2, 2019. The plan is reviewed at least annually and is updated as needed. Due to the uncertain climate of COVID-19, the CCS felt a risk analysis as it pertains to a pandemic was critical to include in our current agency's plan.

Community Care Solutions, Inc. (CCS) is committed to long-range risk management planning to ensure service continuity and, therefore, to a formal and periodic risk management process. Specifically, CCS, is committed to Risk Management to:

- 1) Identify any loss exposures;
- 2) Analyze and evaluate any loss exposures;
- 3) Identify a strategy (including techniques and/or actions) to be taken to counter any
- 4) potential losses or identified exposures;
- 5) Implement the most effective strategy/plan to reduce risk for the Agency;
- 6) Provide ongoing monitoring of any actions taken to reduce risk;
- 7) Report results of actions taken to reduce risks;
- 8) Include the results of risk reduction activities in performance improvement activities.

CCS., to minimize various risks associated with its daily operations, has incorporated policies and procedures to assist in managing the liability associated with delivery of services. This list is not intended to be all inclusive but represents areas where CCS has taken a pro-active stance to help reduce risk in day-to-day operations.

Risk Management Plan Policy:

The Executive Officer, or designee, is responsible for ensuring that an annual risk management assessment is conducted and reporting the findings of that assessment to the organization's leadership. The risk assessment will be conducted annually with results:

- 1) Provided to the organization's leadership and
- 2) Incorporated into and clearly documented as part of program planning efforts, performance improvement activities, strategic planning, community advocacy efforts and financial and resource planning efforts.
- 3) Shared on our website and through newsletters

Areas of Risk:

CCS seeks to minimize risk and potential harm to our persons served, staff, and stakeholders. As part of this focus, CCS leadership prioritized an assessment to include a plan for:

- 1) People (Persons Served, Staff, Referral Sources)
- 2) Work Environment
- 3) Finances & Assets
- 4) Organization and Staff

Current Assessment:

This document and the organization’s responses to the following questions provide documentation of the current risk management assessment conducted in accordance with CARF’s accreditation standards pertaining to risk management. The intent of these items is to develop an open-ending and thought-provoking approach to understanding the level of both current and future risks in order to assist CCS to identify, analyze and resolve known risks. Implementation and monitoring of actions to reduce risk is documented.

The areas of risk were rated as follows:

- 1) Low Risk
- 2) Moderate Risk
- 3) Extreme Risk

Risk Level	Action(s) Required	Possible Examples
Extreme Risk	<ul style="list-style-type: none">• Immediate Action Required• Inform Executive Officer, Founders, and Board of Directors• Notify staff and/or stakeholders as appropriate in official statement approved by Board of Directors.	<ul style="list-style-type: none">• Loss of life• Loss of reputation• Legal actions against Phoenix or staff• Contract Termination

Moderate Risk	<ul style="list-style-type: none"> • Management Mitigation Expected and ongoing monitoring required. • Inform Founders • Notify staff and/or stakeholders as appropriate in official statement approved by Board of Directors. 	Serious harm or injury <ul style="list-style-type: none"> • Damaging litigation • Loss of referral source • Contract Suspension
Low Risk	<ul style="list-style-type: none"> • Monitor Risks (no immediate harm or significant impact) • Manage using routine procedures within agency • Notify staff and/or stakeholders as needed through monthly meetings 	<ul style="list-style-type: none"> • Low impact to Phoenix such as change in referral source. • Change in service staff.

Extenuating Circumstances

CCS community is currently deeply affected by the COVID-19 pandemic. Staff members are concerned for their safety as it pertains to in-home services. Referral sources such as the Department of Family and Children Services have begun working remotely, which has caused a significant decrease in referrals. CCS currently faces a risk of financial loss and decrease in staff willing to provide continued services. While these circumstances may improve, this is not a risk we anticipated previously. Our current plan reflects our analysis and priorities for our agency as it pertains to these recent events.

Analysis Tools

CCS chose to utilize a program called iAuditor by Safety Culture. The assessment tools capture areas of low and high risk and include a feature specifically for COVID-19 response.

FOCUS AREA: PEOPLE	
Areas of Risk: Persons Served	
Risks Assessed	The state continues to pursue Medicaid funded services, attempting to minimize their overall funding for provider contracted services. While does maintain Medicaid contracts, these contracts are limited in their scope of service. These Medicaid contracts only fully cover those individuals fully licensed or seeking licensure.
Risk Rating	Low Rating
Management of Risks	CCS will continue to advocate for the use of state funds for community-based services. In addition, with CARF accreditation CCS is now eligible to apply for federal based grants, increasing our revenue and scope of services significantly
Action Plan	CCS will enroll in the LDH Provider Enrollment summit to pursue more information regarding additional contracts.
Status	CCS will check the LDH website monthly to track the release of the RFP for additional Services.
Areas of Risk: Staff	
Risks Assessed	CCS has struggled to maintain adequate staff to meet current referral source needs. Currently in the uncertain climate of the pandemic, it is uncertain if staff will require additional days off or extended leave to deal with potential health concerns.
Risk Rating	Moderate Risk
Management of Risks	CCS will continue to evaluate the need of the staff to take leave during COVID. Staff are required to follow quarantine guidelines during leave. Staff are also required to notify a supervisor of their required quarantine so that any referral needs may be met

Action Plan	Board of Directors have developed and approved COVID protocols for both staff and referred clients outlining quarantine requirements. This also includes time for leave and continued financial supports during a staff member's absence.
Status	Protocols have been sent out and will be reviewed quarterly or as needed for additional edits and revisions to meet the changing climate of COVID.
Areas of Risk: Referral Source	
Risks Assessed	CCS referral sources are primarily working from home, creating a unique barrier to networking, and soliciting referrals from new DFCS and HANO staff.
Risk Rating	Moderate
Management of Risks	This risk was rated as "moderate" due to its potential to decrease our referral volume. While referrals have improved from the last two months, CCS staff and leadership must adapt to remote working in conjunction with marketing. Networking is a key component to fostering positive relationships with DFCS and HANO staff.
Action Plan	CCS will facilitate monthly Zoom meetings with essential DFCS staff and referral sources CCS will send welcome and informational packets to new staff, which includes information regarding services.
Status	Due to scheduling conflicts CCS has been able to meet with DCFS and HANO at least quarterly to discuss referrals.

FOCUS AREA: WORK ENVIRONMENT

Areas of Risk: Building Access

Risks Assessed	Reasonable security measures are provided at each building. Staff members are trained on appropriate security measures to ensure all facilities remain safe and secure. However, the management team has identified some weakness in building security as follows:
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	The administration building does not have security entrance modifications such as card- key access, but a keypad code only for entering the office.
Risk Rating	Low Risk
Management of Risks	The need for a security access system will be monitored on the risk management guide. An alternative plan will be put in place to lock the doors during early and late work shifts and to have individuals stop and check in with an Operations Manager before moving throughout the office.
Action Plan	CCS has already implemented keypads, however, not all doors have keypads installed. CCS has security cameras; however, weak Wi-Fi signals tend to interrupt continuous monitoring. As a result, CCS has scheduled an update to our internet, including, establishing an independent network for each building. This will minimize monitoring interruption.
Status	CCS has ordered two additional cameras to cover areas in which monitoring was lacking. Cox has installed additional routers to be placed in each building.
Areas of Risk: Area Availability	
Risks Assessed	CCS has evaluated the availability of space in our current office structure to meet the needs of privacy and social distancing.
Risk Rating	Low Risk
Management of Risks	CCS currently has stand-alone offices that effectively separated. Staff have been encouraged to work from home currently, however, are permitted to work at the office with specific safety measures put in place.
Action Plan	CCS staff will continue to work from home unless required to return to the office to perform job duties. CCS staff have adapted easily to working from home, and disruption of services has been insignificant.
Status	CCS administrative staff have split their time between remote and office work. Board of Directors have approved continued remote work

Areas of Risk: Infectious Disease	
Risks Assessed	CCS has analyzed our overall ability to keep our offices clean, sanitary, and minimizing infection disease.
Risk Rating	Moderate Risk
Management of Risks	During COVID, CCS has been fortunate to receive appropriate cleaning, disinfecting, and sanitizing supplies. CCS has developed positive working relationships with local stores that have secured needed supplies for keeping our office operational.
Action Plan	CCS will continue to stock enough supplies such as masks, gloves, sanitizing equipment to create a safe and secure environment for families to participate in services at our offices.
Status	CCS has enough supplies to maintain safe services. CCS staff will monitor supplies monthly to ensure this need is met and the risk is minimized

FOCUS AREA: FINANCES AND ASSETS	
Areas of Risk: Fraud and Waste	
Risks Assessed	CCS has analyzed how the corporate compliance program strives to be effective in preventing fraud, waste, and abuse. Identify any known weaknesses and describe what changes need to be made.
Risk Rating	Low Risk
Management of Risks	CCS has a strong internal control system and comprehensive fiscal policies and procedures. Policies and procedures are reviewed annually to ensure each remain relevant to reduce the potential for fraud and abuse. Billing audits are conducted at quarterly to ensure that billing procedures are ethical and accurate.
Action Plan	CCS conducts monthly and quarterly billing audits to ensure that staff are billing accurately and effectively. CCS staff are also asked to contact the Compliance Officer

	with any known instances of financial fraud and waste. Notifications can be made anonymously.
Status	CCS staff are notified of Compliance Officer contact information and protocols weekly
Areas of Risk: Loss of Contracts	
Risks Assessed	CCS currently maintains statewide contracts with the Louisiana Department of Health These contracts comprise the majority of our services.
Risk Rating	Low Risk
Management of Risks	CCS has maintained contracts for the last several years. While we evaluate this risk as low, if contracts were lost for whatever reason, it would be detrimental to our ability to maintain our business
Action Plan	CCS will monitor contract deliverables and compliance quarterly.
Status	CCS continues to maintain contracts successfully.
Areas of Risk: Reduction in Funding	
Risks Assessed	CCS reviewed the potential risk of reduction in funding through changes to the state Medicaid's programs based on provider's level of education.
Risk Rating	Moderate Risk
Management of Risks	CCS has successfully held funding for the last several years. This funding, however, is not guaranteed each year and could be reduced or eliminated depending on state funding.
Action Plan	CCS will seek out additional grant funding opportunities to supplement Medicaid funding.
Status	CCS has applied for a School Based Mental Health Program Grant to supplement any potential future loss or change in Medicaid funding

FOCUS AREA: ORGANIZATION AND STAFF	
Areas of Risk: Health and Safety Protocols	
Risks Assessed	CCS health and safety program should appear effective in identifying possible risks and hazards. Identify the effectiveness of the health and safety program and list all problem areas along with any corresponding plan of corrective action.
Risk Rating	Low Risk
Management of Risks	CCS has adopted further infection disease protocols in response to the COVID-19 pandemic.
Action Plan	CCS has continued to monitor state and CDC guidelines to meet necessary quarantine and infectious disease responses.
Status	CCS has continued to notify staff and persons served of infectious disease protocols to minimize risks.
Areas of Risk: Insurance Coverage	
Risks Assessed	CCS has continued to review the organization's insurance coverage to protect the organization's assets and protect the organization's personnel in the event of a lawsuit.
Risk Rating	
Management of Risks	CCS maintains, as required by our contracts, the following insurance coverage: <ul style="list-style-type: none"> • Commercial/General liability - 1 million per occurrence/3 million aggregate • Professional Liability -1 million per occurrence/3 million aggregate • Worker's compensation is required, and the amount would be determined by your insurance agency in accordance with the total number of staff you have.
Action Plan	CCS continues to monitor insurance requirements. CCS insurance coverage has been independently managed by HIscox for the last several years.

Status	CCS insurance coverage is audited internally annually.
Areas of Risk: Accreditation	
Risks Assessed	CCS has successfully maintained its 3-year accreditation standards. CCS leadership has analyzed the potential risk of loss of accreditation.
Risk Rating	Low Risk
Management of Risks	CCS leadership monitors CARF requirements quarterly and more often depending on the area of standard.
Action Plan	CCS leadership will continue to facilitate quarterly meetings to review the status or agency's ability to meet CARF standards
Status	CCS has maintained its standards successfully.