

Targeted Case Reviews: Improving Internal Controls and Mitigating Risk

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What is a Targeted Review?

Targeted Reviews are Focused on Compliance with:



Specific Policy or Procedure
(e.g. the comprehensive assessment procedure)



Areas of Case Decision
(e.g. Ineligibility decisions)



Implementation of Processes
(e.g. process of authorizing Fuel cards)



Case Documentation
(e.g. completion of closure letters)



Purpose of Targeted Reviews



Look further into areas with lower compliance



Determine compliance with a specific policy/procedure change



Test effectiveness of training or need for training



Focus on a specific case decision or a step in the case progression

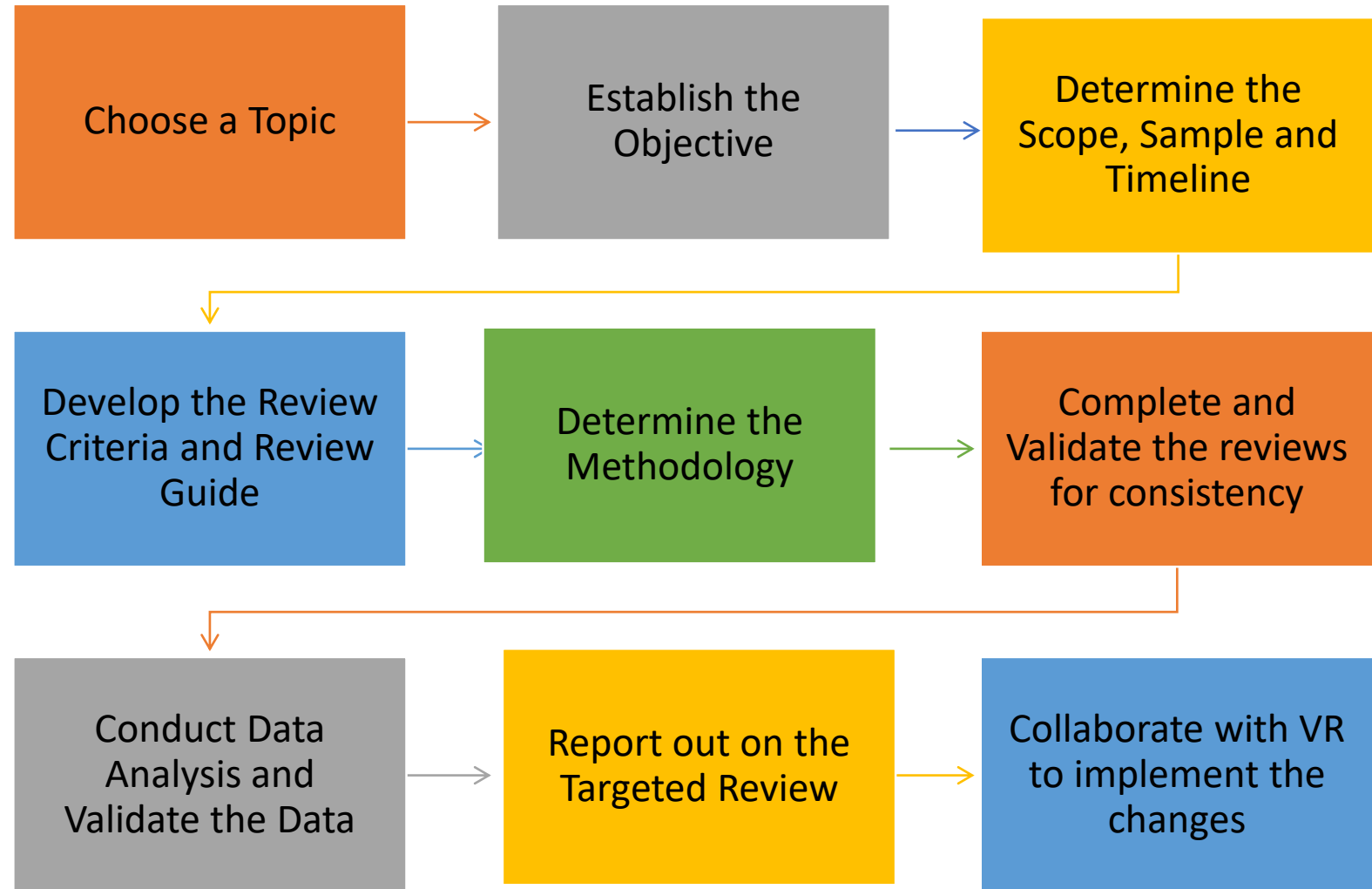


Evolution of the Targeted Review

- 2017 - 1st official targeted review conducted on cases closed using any of the 5 Ineligibility related codes
- Why? Routine Case Reviews (i.e. compliance reviews) revealed improper use of ineligibility codes
- Resulted in MCU training field staff in April 2018 and MCU now conducts a monthly review of 1 of the 5 codes with highest risk
- 2019 - Monthly review of cases closed “Ineligible-Disability too Severe/Unable to Benefit from Services” reduced by 66%



Targeted Review Steps



Choosing a Topic for Targeted Review

Trends and Patterns from compliance reviews

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graph TD; A[Trends and Patterns from compliance reviews] --> B[Request from Management]; B --> C[Request from VR divisions (e.g. Policy and Training Unit)]; C --> D[Change in a procedure or process];
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Request from Management

Request from VR divisions (e.g. Policy and Training Unit)

Change in a procedure or process



Establishing the Objective



What do we want to find out
from the review?



Is the objective:

Specific?

Measurable?

Relevant?



Determining the Scope, Sample, and Timeline

Beginning and end points of the review

- Consider the objective, the intended audience, and the intended application of the findings
- Avoid “scope creep”

Population and Sample Size

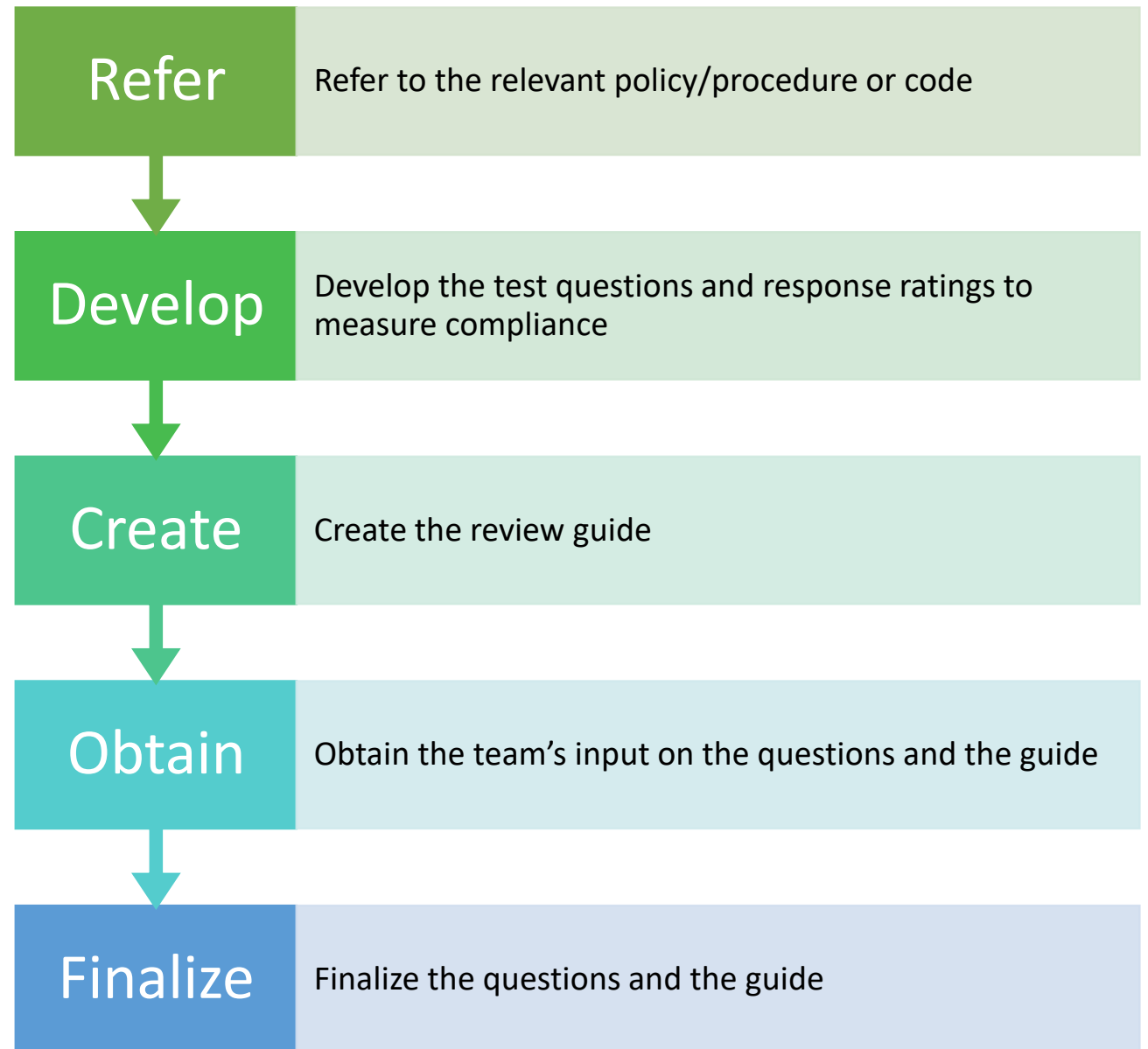
- Number of reviews to be completed
- Consider Confidence interval (if needed)

Determine the project timeline for completion of the Targeted Review

- Set timelines for testing, validation, report writing



Developing the Review Criteria and Guide



Why use the Review Guide?

- Consistency in testing and responding
- Eliminate subjectivity
- Clarifies decision points, corrections required based on the ratings (if any)
- Assists with determining the review methodology

- Example of a guide:

Q. #	Question	Responses: Present (P), Not Present (NP), Not Applicable (NA)	Additional Info
1	XYZ form is completed	P: Signed form is saved in the case record NP: No form in the case record OR the form is not signed NA: The form was not required	If the form is generated in the case, but is not signed, add a comment - Correction needed
2			
3			



Determining Methodology

Number of test questions

Types of responses

Need for corrective action

Level of access to the review

Number of reviewers

Complexity of the review

Reporting needs



AWARE QA Tool for Reviews

- Easy to set up but adding or changing questions or responses is difficult
- Reviews completed individually vs. on a single worksheet for all reviews
- Access to the case reviews
- Supervisors can access each review and comments
- Requests for corrections can be sent to the supervisor from the QA Tool
- Connected to Tableau for accessing reports
- Limitations in pulling information



Microsoft Excel for Reviews

- Easy to set up and add/change questions
- Multiple hands on one sheet- May increase human errors
- Access to the case review
- Easy to validate numbers
- Corrections needed summarized in email to management
- Easy to analyze data with filters and pivot tables



Implementing the Testing Methodology



CREATING A REVIEW SET IN
THE AWARE QA TOOL MODULE



CREATING THE EXCEL
SPREADSHEET



Targeted Review Set in the AWARE QA Tool

Documentation of Comprehensive Assessment (CA) Process

<u>Review Item</u>	<u>Response</u>	<u>Comment</u>
1. CA process summary case note completed*	P	
2. CA process summary case note titled correctly*	NP	Case note title does not match the procedure requirement of "CA Process Summary"
3. Documentation of the Summary of Impairments and functional limitations are included in the CA process summary case note*	P	



Targeted Review spreadsheet in MS Excel

ETRs utilized for VR Eligibility

Case ID	Reporting Structure	ETR da	Elig date	In school?	ETR current?	ETR signed?	ETR lists category?	Reviewer	Comments
341759	*Northwest ED	2/22/2017	10/4/2018	Y	Y	Y	Y	PG	
346147	*Northwest ED	5/25/2010	11/7/2018	Y	N	Y	Y	CK	ETR not current at the time of elig.



Completing the Reviews

Assign cases to each reviewer

Complete a couple of reviews

Re-group to validate and discuss if changes are needed

Update the test questions / guide if needed

Update the testing sheet / template if needed

Complete all assigned reviews by the established timeline



Validating the Reviews

01

Lead reviews the ratings for accuracy and consistency

02

Lead assigns cases for peer validation

03

Discuss discrepancies if needed

04

Evaluate if validation of additional cases is needed



Analyzing and Validating data

▶ Data Analysis

- Create data tables with percentages for each test question from the data source:
 - AWARE QA Tool: Reports from AWARE / Tableau
 - MS Excel: Filters, Pivot tables

▶ Data Validation

- Another reviewer validates the accuracy of the data table



Reporting out on the Targeted Review

- ▶ Follow a template for report writing
- ▶ Validate information and numbers reported under “Findings”
- ▶ Request input from team and manager
- ▶ Revise report if needed per feedback
- ▶ Share the report



Report Template

- Objective
- Background and Scope
- Review Criteria
- Findings
- Conclusion
- Recommendations
- Appendix



Objective, Scope and Review Criteria

- Objective:
 - Objective statement
- Background and Scope:
 - Rationale behind the review
 - Sample
 - Time frame
- Review Criteria
 - Focus on the main areas



Findings and Conclusion

- Findings

- Results of the review
- Story behind the numbers

- Conclusion

- Summarize
- Extrapolate
- Explain needed improvement



Recommendations and Appendix

- Recommendations

- Training
- Policy/Procedure revisions
- AWARE changes
- Review and change a process

- Appendix

- All data: Tables and / or Graphs

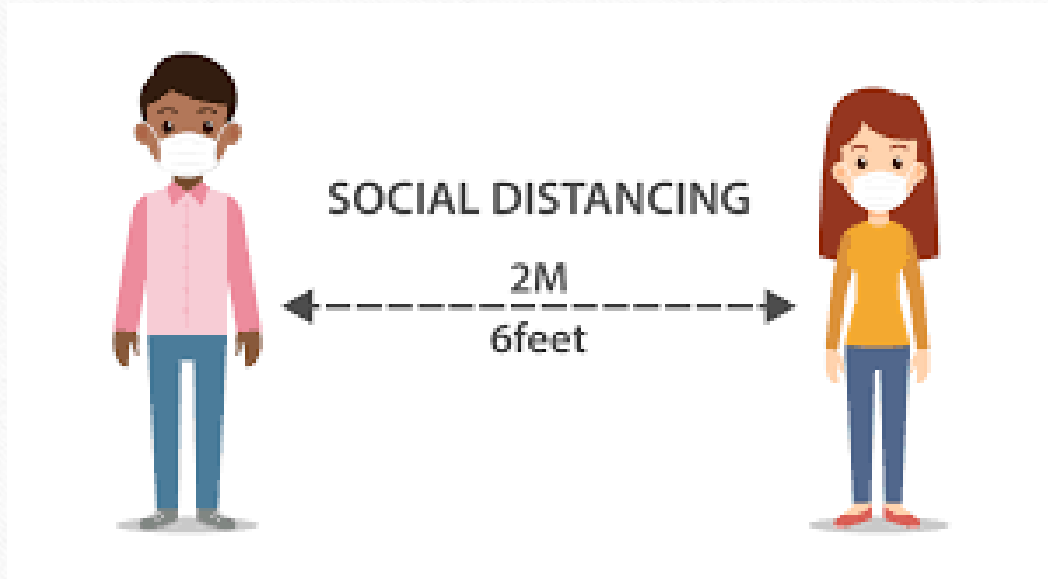


Collaborating to Implement Change

- ▶ Ensure corrections are made in the case (if needed)
- ▶ Discuss the findings, recommendations and next steps with management if requested
- ▶ Provide Technical Assistance and/or training to staff based on the report recommendations as requested
- ▶ Offer follow up Targeted Review(s)



Mitigating risk: Proactive Vs. Reactive



Mitigating Agency Risk

- Be part of the “change process”

 - Recommend changes to policy / procedure
 - Review the proposed changes to policy / procedure before implementation
 - Provide input on training
 - Provide training
 - Share information in the MCU Newsletter “MCU FOR YOU”



Takeaways

- Develop a Project Schedule with timeline
- Limit the number of reviewers
- Identify a person that will lead the Targeted Review
- Stick to the Objective and Scope
- Focus on the wording of the questions
- Use a Review Guide for consistency



Takeaways (Continued)

- Start with a small test sample. Regroup and update questions if needed
- Validate answers for consistency and data for accuracy
- Save Save and Save your data!
- Keep your audience in mind while writing the report



There are no easy Targeted Reviews!!



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Thank you for participating!

