Washington State Department of
Labor & Industries

Quality Assurance (QA)

Validation Orientation

12/10/2020

AGENDA

- The Quality Assurance Plan
- Quality Assurance Highlights
- The Validation Cycle
- Validation in Action
- Panel Discussion
- Resources and Next Steps

The Quality Assurance (QA) Plan

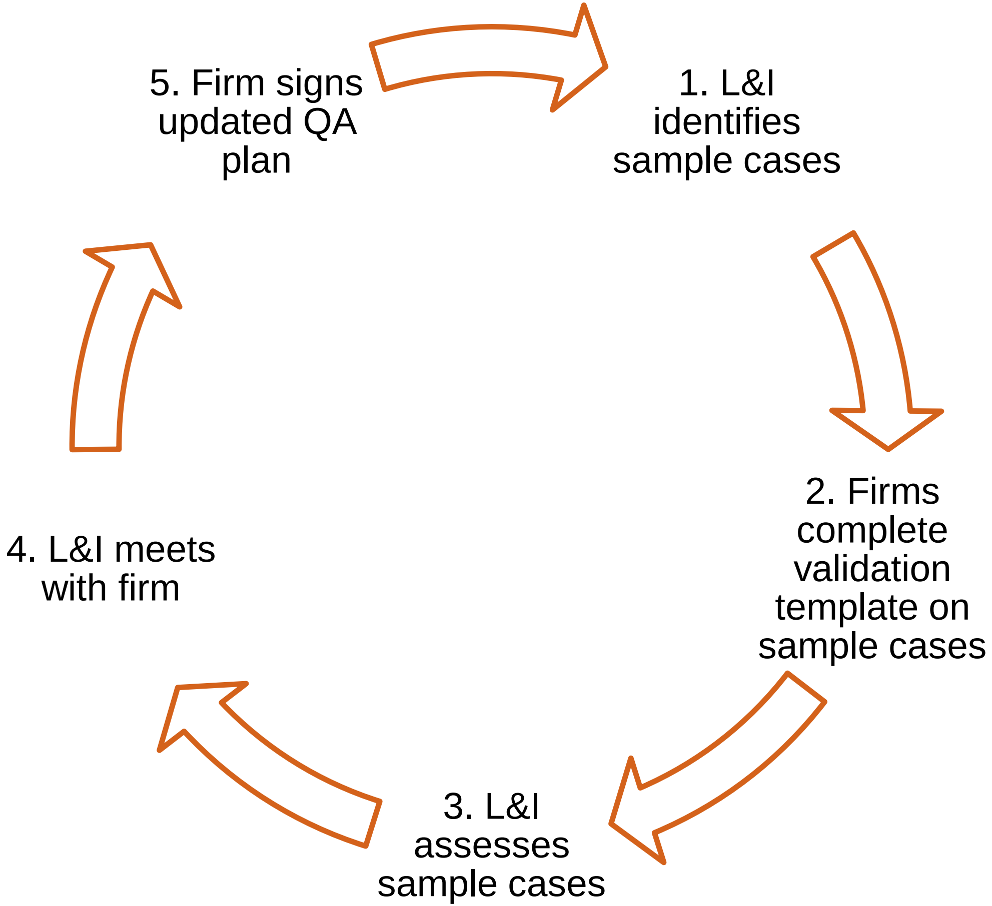
WAC 296-19A-210(9)(d): In order to receive referrals from the department, vocational rehabilitation firms must:

- Sign and submit the **Annual Vocational Firm Agreement** by **Dec. 15**.
- Submit, implement, and periodically report on a department-approved **QA Plan** at intervals determined by the department. The QA Plan must be signed and returned to L&I by **Dec. 31.**

Quality Assurance Plan Highlights

- Track and report monthly data on QA elements
- Participate in validation cycles
- Manage aged vocational referrals (AWA)
- Monitor, review, and outline how the firm will implement department feedback

The Validation Cycle



The Validation Cycle

Validation meetings will kickoff in February and March 2021.

L&I arranges validation meeting time
- At least one month prior to meeting

L&I sends validation referral claim numbers to firm
- Four weeks prior to meeting

Firm completes validation template and returns to L&I
- Two weeks prior to meeting

Validation meeting
- QA Plan updated and signed post-meeting

The Validation Cycle

Refer to QA Plan for template and example:

Appendix C – Vocational Recovery Referral Validation template

Must be submitted within a reasonable amount of time prior to the scheduled meeting with representatives from the department.

Does the VRC's use of activity codes adequately and accurately reflect services provided to worker (as evidenced in case notes)? Please explain.

Did VRCs consistently and adequately pursue engagement with the worker, the employer, and medical providers in addition to conducting case management activities? Please substantiate or identify how VRCs could have been more successful.

Did engagement activities help workers to identify and pursue return-to-work goals? Please explain.

Knowledge Check

True or False:

QA data is reported monthly. However, the validation cycle occurs only 3-4 times per year (every 3 or 4 months).

TRUE

Knowledge Check

True or False:

The firm should select the claims to validate with L&I.

FALSE

L&I will send the firm a set of randomly selected claim numbers to validate, along with the validation template to complete prior to the meeting.

Knowledge Check

True or False:

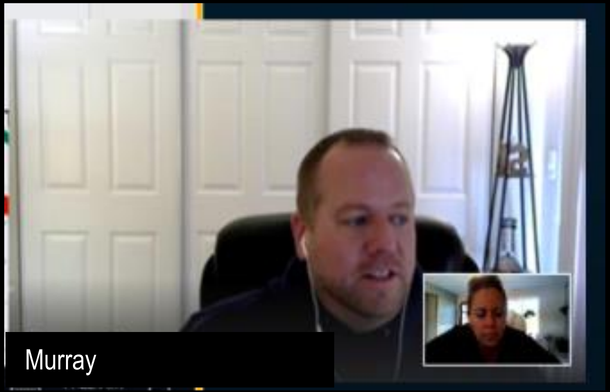
Both the QA Plan and the new Vocational Firm Agreement must be signed and returned to L&I to receive state fund referrals.

TRUE

Validation in Action

“Ann” – L&I representative

“Dr. Glenn” – L&I assistant



“Murray” as the firm owner

Before the validation meeting

Murray receives first validation email and opens attachment

Hi Murray,

Please answer the questions in the attached validation template for the following randomly generated list of referrals:
Claim #1
Claim #2
Claim #3
Claim #4
Claim #5

Send your completed validation to vocationalfirmdata@lni.wa.gov by Dec. 22. Look for an invitation to discuss your validation with L&I shortly.

Before the validation meeting

Murray reviews the validation template

Appendix C – Vocational Recovery Referral Validation template

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Does the VRC's use of activity codes adequately and accurately reflect services provided to worker (as evidenced in case notes)? Please explain.

Did VRCs consistently and adeq
and medical providers in addition
substantiate or identify how VRC

Did engagement activities help w
explain.

Do progress reports and other c
provide all relevant information t

Were there any systemic barriers
to return to work or to find new w

Did you take any follow-up action
show evidence of any action take

How have these reviews (positive
provide detail of any changes.

Appendix C – Vocational Recovery Referral Validation template

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Before the validation meeting:

Murray completes the validation template

Vocational Recovery Referral Validation SAMPLE

Must be submitted within a reasonable amount of time prior to the scheduled meeting with representatives from the department.

Does the VRC's use of activity codes adequately and accurately reflect services provided to worker (as evidenced in case notes)? Please explain.

- Five of the six claims had reported activity codes that accurate[illegible] [illegible]acked the engagement with the worker. Two of those claims had in-pe[illegible] enga[illegible]ement which the VRC noted with the activity code. The other three did n[illegible] [illegible]eet[illegible] in-person and their activity codes used reflected the meeting [illegible] done by telephone.
- In the remaining claim, the VRC incorrectly used [illegible] in-person act[illegible] code. It was actually a meeting over Skype.

Did VRCs consistently and adequately pursu[illegible] [illegible]ngag[illegible]ent w[illegible] [illegible] worker, the employer, and medical providers in addition to conduc[illegible] case [illegible]nagem[illegible] activities? Please substantiate or identify how VRCs cou[illegible] have [illegible] more successful.

- For all claims reviewed in this [illegible] eng[illegible]ment with the worker was ongoing and robust. Each claim [illegible]viewe[illegible] [illegible] ev[illegible]ce of a minimum of two phone calls or Skype engagemen[illegible] [illegible] [illegible]ke[illegible] [illegible]wo claims had in-person meetings with the worker as well.
- In five of the s[illegible] claims, the [illegible]ploy[illegible] was contacted to determine the availability of a modified duty [illegible]. In thre[illegible] [illegible]f those claims the employer and VRC successfully completed a m[illegible]difie[illegible] job description. Two of the six referrals the employer and VRC discusse[illegible] [illegible] duty but the employer did not have modified duty [illegible]ility at th[illegible] [illegible]ne.
- [illegible]hree [illegible] six [illegible]ms had a phone call to the medical provider's office to discuss a [illegible] du[illegible] [illegible]ob.
- In one of th[illegible] [illegible]aims reviewed, the medical provider requested a phone call with the VRC [illegible]uss a job analysis. Unfortunately, the VRC sent a letter instead.

Did engagement activities help workers to identify and pursue return-to-work goals? Please explain.

- For one claim, the worker expressed concern about reinjuring himself, but was reassured that the employer was working on an at-home work station to help him recover from a back sprain.
- For one claim, the VRC attended a phone conference call with the worker and WorkSource VSS.
- For one claim, the VRC provided a WorkSource referral with a brochure, but no further support or follow up was noted.
- For three of the claims, the worker indicated that they were focused on treatment and not ready to identify a return-to-work goal.

Do progress reports and other communications (for example, EVOC or phone calls) provide all relevant information to facilitate claim management?

- VRC case notes in one claim indicate the worker is anxious and interested in speaking to a mental health counselor. This information was not conveyed in the progress report to the claim manager.
- For remaining case notes, all relevant information was [illegible]ained [illegible] the report.

Were there any systemic barriers or delays that substantially imp[illegible] the w[illegible]r's ability to return to work or to find new work? Please explai[illegible]

- In two claims, magnetic resonance imaging (M[illegible] requests [illegible]ceived a denial recommendation as the requests di[illegible] [illegible]t ima[illegible] [illegible]elines.
- In one claim, the worker was dist[illegible]ful of [illegible] claim p[illegible]cess as time-loss payments were previously delayed du[illegible] an [illegible] prescription form (APF) not being in the file to justify release of the [illegible]nt.

Did you take any follow-u[illegible] wi[illegible] VR[illegible] or adjust firm practices? Please explain and show evidence of any actio[illegible]ke[illegible]

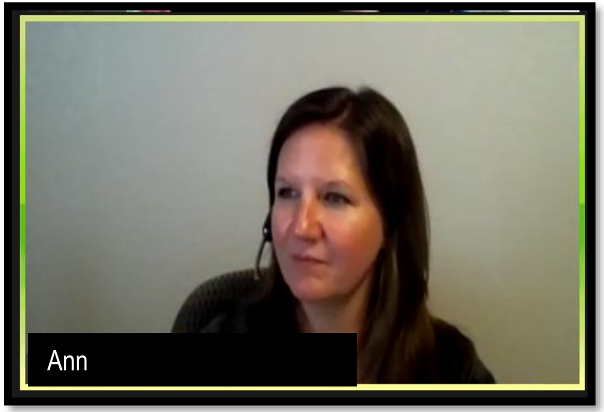
- I noted p[illegible] engage[illegible]nt and excellent case management from one of my VRCs. We [illegible]en[illegible] [illegible]gnize[illegible] them for their efforts and had them provide training in one of the s[illegible]ff [illegible]eting[illegible].
- I worked wit[illegible] [illegible]other VRC regarding documenting case notes with activity codes [illegible] S[illegible]e meeting was incorrectly coded as in-person meeting.

How have thes[illegible] [illegible]eviews (positive or negative) informed your firm's QA plan? Please provide [illegible] of any changes.

- Review processes allowed us to examine our activity codes to make it easier for our staff to accurately document their engagement activities. As a result, we will work with the software vendor to make codes more efficient.
- Based on VRC's quality work in a difficult claim, we have incorporated a brainstorming activity in our all-staff meetings to discuss new ideas in case management.
- VRC feedback lists and prior QA reviews have shown that VRCs have prematurely recommended assessment services without sufficient investigation into whether jobs are obtainable with a new employer. We are providing ongoing training to reflect that this should be addressed during the VR phase.

Before the validation meeting

L&I reviews claims and prepares for conversation



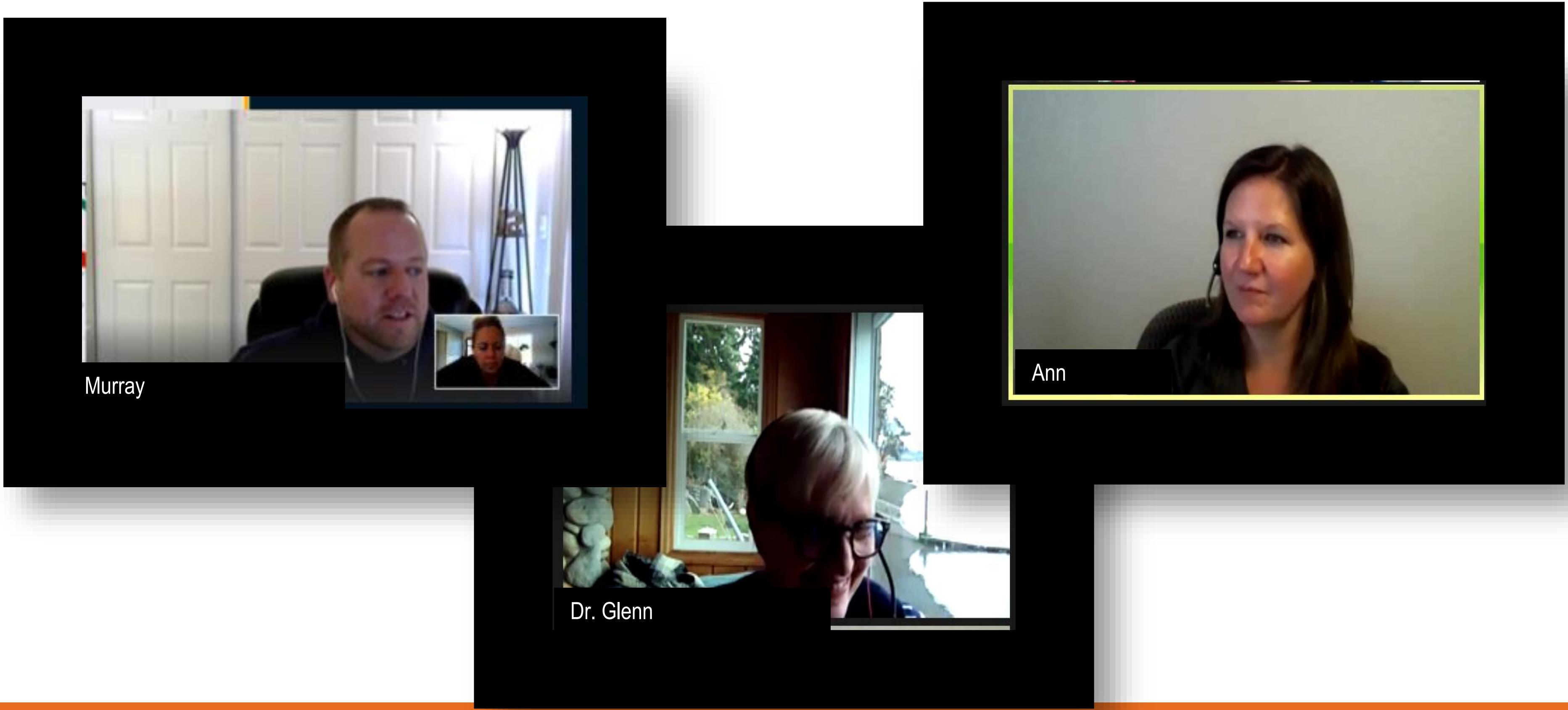
Ann – L&I representative

Dr. Glenn - L&I assistant

Day of validation meeting

Murray does some self-reflection on the day of the meeting.

The Meeting

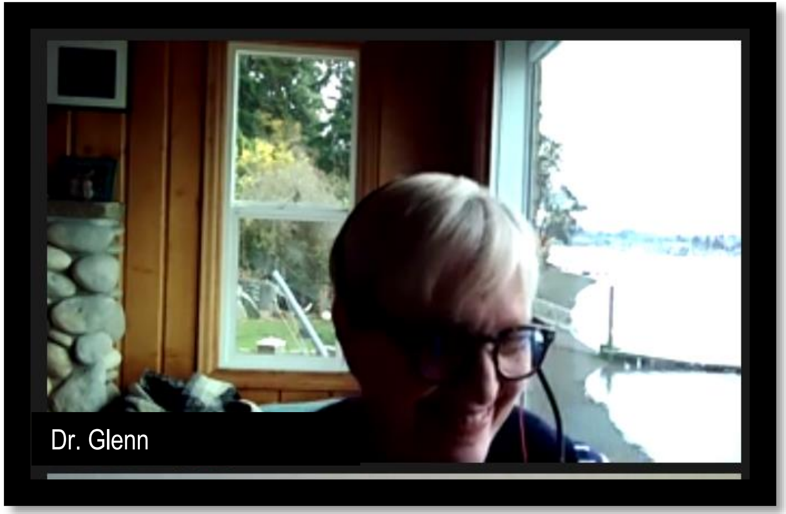


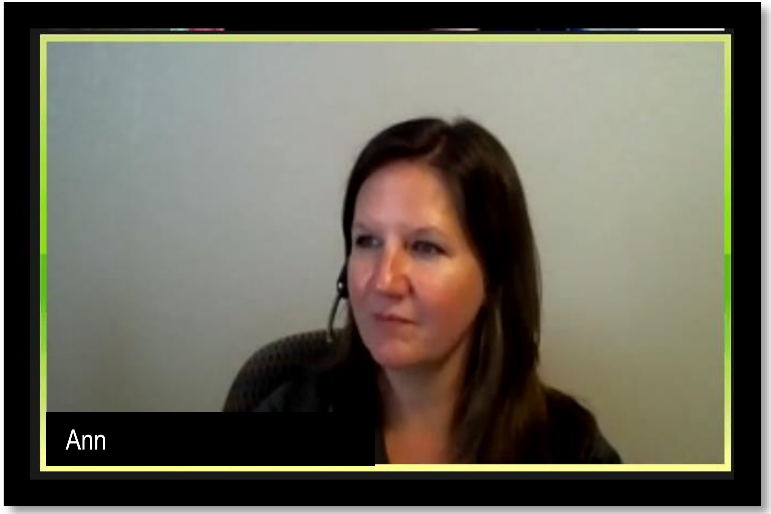
After the validation meeting

Murray reflects…

After the validation meeting

L&I team debriefs and prepares the follow-up.





The follow-up

- L&I sends the firm an updated QA plan addendum*, referencing specific-activities the firm needs to implement and monitor in preparation for the next meeting.

- EXAMPLE:
  - Share the positive feedback with VRCs
  - Reinforce timeliness of progress reports with VRCs and show improvement by next validation meeting
  - Incorporate strategies to engage with medical providers
  - Continue to cultivate relationships with local businesses

- Formal agreement of firm-specific QA activities will be captured through a signed addendum* to the QA plan.

**The addendum template is still under review at the department.*

NOTE: If L&I makes significant changes to the comprehensive QA Plan, firms will receive 60 days notice.

Knowledge Check

True or False:

During the validation meeting, L&I may surprise the firm manager/owner with a discovery they have not shared in advance. L&I considers these “gotchas!”

FALSE

L&I will proactively communicate with you about any issues (ongoing or newly discovered). The meetings are about discovering opportunities, recognizing excellent work, and building a stronger partnership in helping workers return to work.

Knowledge Check

True or False:

During the validation meeting, the firm manager and L&I will compare and contrast observations made on the sample cases. They may also discuss department feedback, QA data reports, and the number of VRCs who can take a lead role in VR referrals.

TRUE

Knowledge Check

True or False:

The validation meeting is <u>not</u> a time to ask the department for additional support or raise a concern with the data or QA process.

FALSE

The validation meeting is a GREAT opportunity to ask questions, gain clarity, and express concerns. L&I is partnering with the vocational community to continuously improve our model. Your suggestions are always welcome.

Knowledge Check

True or False:

L&I can make changes to the comprehensive QA Plan at any time without advance notice.

FALSE

Any changes made to the QA Plan will be communicated 60 days prior to effective date, in alignment with WAC 296-19A-210.

Thank you to our panel discussion members!

- Karin Larson
  - Vocational Rehabilitation Specialists
- Kaethe Long
  - Grant and Associates
- Leigh Haley
  - Strategic Consulting Services
- Krista Kilpatrick
  - Eastside Vocational Services, LLC
- Kristine Ostler, L&I
- Erich Hahn, L&I

Q&A

- **Test firms, how would you characterize your experience with the validation process?**
  - Firms agreed the validation process was a good investment in time and they each had unique insights about what their VRCs were doing well and where improvements can be made. A lot of positive feedback was provided, which firm managers took back to their teams. Firms felt supported and appreciated the level of detail L&I demonstrated in their preparation for the meetings.

- **How long did it take you to prepare?**
  - Large firms were sent five cases to review. Smaller (or single person) firms were sent three. Firms reported spending approximately 15-30 minutes per file, although the complexity of some cases may require more time. Completing the template took about an hour.
  - Internally, L&I spent approximately 20 minutes per file, making observations and preparing notes for their conversation with the firms.

Q&A

- **How does L&I plan to staff up to handle the work of verifying validations with firms?**
  – L&I is in the process of identifying skills and qualifications needed to staff permanent positions for the validation program. However, recruiting and hiring will not begin until the first quarter of 2021. The Vocational Recovery Project members will continue to manage validations with firms until a permanent team is up and running.

- **For the Vocational Firm Agreement, does L&I require credentials and proof of insurance for interns?**
  – Yes, any earned credentials and valid evidence of insurance is required for interns.

Q&A

- **What is the difference between “lead” and “assigned” VRC in the context of a vocational referral?**
  - The assigned VRC is the credentialed VRC responsible for the referral.
  - The lead VRC must establish themselves as the primary point of contact for the worker. They demonstrate a higher degree of worker engagement, which is generally construed as completing at least half of the worker engagement activities and correlated billing submissions. In this way, the lead VRC is much like the assigned VRC. However, the lead VRC can be an intern under the supervision of their VRC supervisor who has the appropriate credentials under WAC 296-19A-210, or the assigned VRC. If the assigned or supervising VRC selects an intern as the lead, the intern must demonstrate a higher degree of worker engagement, which is generally construed as completing at least half of the worker engagement activities and correlated billing submissions.
  - Lead VRC counts are reported by the firm to the department as a measure of their capacity and will be periodically authenticated. Only interns *with at least one year of internship experience with Washington state* can be included in a firm’s capacity count.
  - Refer to QA Plan, page 7

Q&A

- **Does the validation of a referral focus on a specific period of time or should we review the whole case?**
  - The entire case will provide insight for your evaluation of services for the specific vocational phase being validated.

- **Should firms be prepared to discuss anything other than the validation document in the meeting?**
  - Firms should be prepared to discuss additional information and progress since the last meeting including: QA data they have submitted; department feedback they have received (like VSS feedback reports); follow-up activities from the last validation conversation; updates to the number of VRCs who are willing, able, and meet the expectations required to accept referrals; and any concerns or questions they want to discuss with the department.

Q&A

- **Will the number of referrals we validate always be between three and five?**
  - As we add more referral types over time, we may need to re-evaluate the number of individual types in the sample size. If we increase the number of referrals in the sample, you will be given advance notification.

- **Is there still a grace period for submitting progress reports?**
  - Timely submission of PRs is required by the Washington Administrative Code (WAC) 296-19A. Submit PRs every 30 days (+/- 5 days) and follow department guidance for billing multiple (tie-in) claims or submitting reports on more than one open referral for a worker.

- **How often will I receive an “aged vocational referral” report?**
  - The reports will be sent quarterly. You can expect the next report in late February/early March.

Resources and Next Steps

- Validation template is located in appendix C of the QA Plan
- What's next?
  - December: Firms sign and return Annual Vocational Firm Agreement and QA Plan.
  - January and February:
    - L&I schedules initial meeting with each firm.
    - L&I identifies and sends list of claims to each firm to validate.
  - February and March:
    - Validation conversations between firm and L&I.
    - Firm signs and returns addendum to the QA Plan to L&I.
- Send questions to: VocRecoveryProject@Lni.wa.gov