



**Adult Protective Services Collaborative Response to
Elder and Vulnerable Adult Abuse (CREVAA)
Program**

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Tennessee Department of Human Services

Adult Protective Services

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I. Purpose

This document explains the procedure for the Collaborative Response to Elder and Vulnerable Adult program.

II. Definitions

A glossary of terms for the document

Term	Definition
A/N/E	Abuse, Neglect, and/or Exploitation
APS	Adult Protective Services
Caregiver	A person or institution that has assumed the duty to provide for the care of the adult by contract or agreement, or service exchange (i.e. someone who provides cleaning, cooks, or shopping etc. in exchange for room and board.) A caregiver may be paid or unpaid. In situations when no one has assumed the caregiving duties previously mentioned, a caregiver, including a parent, spouse, adult child, or other relative, both biological or by marriage, who: 1. Resides in the same building with or regularly visits the adult; and 2. Knows or reasonably should know of the adult’s mental or physical dysfunction or advanced age; and 3. Knows or reasonably should know that the adult is unable to adequately provide for the adult’s own care.
Case Management	Collaborating with other agencies or community partners to provide comprehensive services to vulnerable adults while respecting their right to self-determination.
CIC	Criminal Injury Compensation
CMS	Case Management System
CREVAA	Collaborative Response to Elder and Vulnerable Adult Abuse
Elder	An adult aged sixty (60) or older
HIPAA	Health Insurance Portability and Accountability Act of 1996
HITECH	Health Information Technology for Economic and Clinical Health Act
LEP	Limited English Proficiency
OIG	Office of the Inspector General
OCJP	Office of Criminal Justice Programs
PII	Personally Identifiable Information

Self-Neglect	The result of an adult's own inability, due to physical and/or mental impairments or diminished capacity, to perform essential self-care tasks including: obtaining essential food, clothing, shelter, and medical care; obtaining goods and services necessary to maintain physical health, mental health, emotional well-being and general safety; and/or managing financial affairs.
TDHS	Tennessee Department of Human Services
Vulnerable Adult	A person eighteen (18) years of age or older who, because of a mental or physical dysfunction is unable to fully manage their own resources, carry out all or a portion of the activities of daily living, or fully protect against neglect, exploitation, or hazardous or abusive situations without assistance from others.

III. Procedure

CREVAA Advocates Personnel Requirements

At minimum, the candidate must:

1. possess an undergraduate degree from a four (4) year college or university (preferred in a health or social service field).
2. have, at minimum, one (1) year of experience in social services, gerontology, or a related field. If the candidate has no experience in either of these fields, approval may be obtained from APS.
3. complete a background check before initial hire and every five (5) years thereafter. Agency policies requiring more frequent background checks are also acceptable. If the background check has findings, the APS Program Director must be consulted.
4. have reliable transportation, as travel is required for this position.
5. meet all other licensure personnel requirements.

Collaborative Response to Elder and Vulnerable Adult Abuse (CREVAA) advocates must sign and agree to the [TDHS Code of Ethics and Standards of Conduct](#).

Vacancies

The CREVAA program will maintain personnel files as required by agency licensure and will notify the CREVAA Program Manager within five (5) days of any personnel changes or staff unavailability.

Job Duties & Responsibilities

CREVAA advocate duties may include, but are not limited to:

- Receiving and reviewing referrals from appropriate referral entities and determining eligibility for appropriateness and participation in the program;
- Providing appropriate and allowable CREVAA services to eligible individuals;
- Ensuring the CREVAA services are tied to the alleged crime;
- Providing education and outreach to stakeholders, the general public, potential victims, and families of victims about the CREVAA program;
- Opening and closing cases for service recipients;
- Ensuring timely and accurate data entry of all case related data and other reporting tools, as required by APS;
- Maintaining and submitting accurate and timely monthly reports; or
- Attending all trainings as required by the state.

Note: The day-to-day personnel supervision of each advocate will be performed by the CREVAA providers. APS will be responsible for programmatic oversight of the CREVAA program.

Note: If an employee charges one hundred percent (100%) of their time to a single federal award on an OCJP contract for a period of six (6) months or longer, they must complete the Certification of Time Charged to a Single Federal Award. If staff are not paid entirely by CREVAA funds, they must log the detailed timesheet of CREVAA activities performed. The signed form must be retained by the CREVAA provider in the employee's personnel file and maintained as required by agency licensure.

Background Checks

The CREVAA provider shall conduct criminal background checks from each of the bulleted registries/agencies listed below for those who have direct contact with the alleged victims and then every five (5) years thereafter. The background check must be completed before the CREVAA provider

is hired and as needed by the agency's policy/licensure rules. If the candidate has convictions, the APS director must be consulted before hire. CREVAA providers shall perform all background checks and maintain documentation in the personnel file.

- [Tennessee Bureau of Investigation \(TBI\) sex offender registry](#) and the [National Sex Offender Search](#)
- Tennessee [Felony Offender Information Lookup](#) (FOIL)
- Criminal history
- TDH's [Vulnerable Persons Registry](#)
- National Background Check or a private National Criminal History Check/Screening
- [FBI Fingerprints](#)

Required Trainings

CREVAA personnel (including interns) shall complete the below training within ninety (90) days of hire:

- [Criminal Injuries Compensation Program \(CIC\)](#) by the Tennessee Department of Treasury and trained every three (3) years thereafter.
- [Title VI Civil Rights training](#) for each staff member paid or working, either directly or indirectly, on the CREVAA program, and annually thereafter per their agency licensure requirements.

Agencies are responsible for maintaining proof of completion of all required training and completion or acknowledgement of any new or updated policies.

Program Eligibility

For a client to receive CREVAA services there must be an alleged crime. These crimes do not have to be proven. The CREVAA advocate's discretion should be used in cases where it is suspected that the client has falsely alleged a crime to receive services.

As long as there is an allegation of a crime, services may be provided. If additional information is received/known that indicated the CREVAA client is no longer eligible/meets criteria, CREVAA services must end.

The individual must be sixty (60) or older or meet the Adult Protective Services' (APS) vulnerability definition and is a victim of an alleged crime.

Note: Self-neglect cases cannot be handled through the CREVAA program. If self-neglect is discovered during the referral process, the advocates will refer the case back to APS.

All services provided under CREVAA using VOCA funds will be provided to elder and vulnerable adult victims of crime at no charge.

The CREVAA program funding should be considered as the funding source of last resort. This means that if there are other funding sources that can and will cover the cost of the item or service the elder or vulnerable adult victim of crime needs, then that funding source should be utilized. For example, if there are known resources including insurance, Medicare, Medicaid, family, that will cover needed emergency services, that source should be utilized to provide needed services.

Refer to the [Victims of Crime Act Definitions, Allowable and Unallowable Costs and Services](#) for allowable expenses.

In-Kind

The CREVAA program may accept voluntary donations from anyone, including the elder or vulnerable adult victim of crime and/or family members.

*Due to a pandemic waiver until Fiscal Year 2025, in-kind is not required.

Referrals

Direct Referrals from APS

The CREVAA program will accept both direct and self-referrals for services. APS direct referrals shall take priority and include the most recent [hs-2971 APS Assessment](#) (internal use only) and the referral form.

The CREVAA advocate should contact the CREVAA Program Manager to establish communication between APS and CREVAA regarding any open APS case needing CREVAA services.

Referrals from Other Agencies

The CREVAA program can also accept referrals from, but not limited to:

- District Attorneys
- law enforcement
- Vulnerable Adult Protective Investigation Team (VAPIT)
- hotline calls
- anonymous
- Victim Service Coordinators

Screen Outs from 1215 Notifications

APS will notify CREVAA via the 1215 ([hs-1215 APS Report of Alleged Abuse, Neglect, or Exploitation of an Adult](#) – Internal Use Only) for those reports that do not meet APS criteria but have a crime with an alleged perpetrator (AP). Once the 1215 is received, the following steps must happen:

- The advocate must determine eligibility for CREVAA services and attempt contact within ten (10) business days.
- The 1215 must be documented.
- If the client appears eligible and accepts services, see Client Assessment section below.

Action Steps for Referrals

The CREVAA advocate is responsible to complete the following:

- Determine eligibility for CREVAA services within:
 - three (3) business days for non-APS referrals, and
 - two (2) business days for APS referrals.
- A notification letter indicating referral status (acceptance or denial) must be sent to the referral source.
- Initial phone contact with the client must be made after acceptance. The assessment can be started during the initial phone contact.
 - If unable to reach a client and there is reason to suspect their safety is at risk, the advocate shall take all appropriate actions. These could include requesting a wellness check from the appropriate authorities and/or making a report to APS.
 - If there have been three (3) unsuccessful attempts to a valid phone number (at different times of the day) in a five (5) day period, then a no-contact letter must be mailed. A letter must also be mailed when they appear to be eligible for CREVAA services and:
 - no phone number is listed on the 1215 or in the case management system (CMS),
 - the client's phone is disconnected, or
 - a voicemail was left.

- At the CREVAA advocate's discretion, an in-person visit may be conducted.

Initial Face-to-Face Visit

- The following forms and information must be reviewed with the client, and all applicable signatures obtained during this consultation.
 - The [CREVAA Client Release of Information](#) (ROI) form (as needed for each agency/person) must be completed.
Note: If the alleged perpetrator is the POA or conservator, they are not allowed to sign required documents.
 - Grievance policy
 - Criminal injuries compensation information
 - A safety plan shall be developed and reviewed with the individual or designee that is person-centered and trauma-informed that also:
 - Responds to the emotional, psychological, and physical needs of the client
 - Assists the client to stabilize their lives after victimization
 - Assists clients to understand and participate in the criminal justice system
 - Restores a measure of security and safety to the client
- Provide applicable resources (Refer to OCJP's [Best Practices/Innovations](#) Resource Links)
- The client must be informed that Tennessee has mandatory reporting laws, so if the advocate suspects A/N/E, they are required to contact the proper agencies.
- CREVAA will initiate services no later than five (5) business days after the face-to-face assessment.
- Contact must be maintained with the client at least every thirty (30) calendar days for the duration of the case.
- Once the safety plan is completed and the client no longer needs emergency services, supports, or referrals and is stabilized following the alleged crime, the advocate will send a closure letter and survey to the client within ten (10) business days.
- Since Tennessee has mandatory reporting, any abuse, neglect, or exploitation (A/N/E) must be reported to APS.

Note: Clients with limited English proficiency (LEP) must receive assistance through the language line.

Case File Management

Client files must be maintained in accordance with the [OCJP requirements](#).

Client Assessment

Once the CREVAA advocate receives a referral or 1215, or accepts a self-referral, he/she must:

- document the referral in the case file,
- determine that the referred client appears eligible for CREVAA services,
- notify APS of referral status (for APS direct referrals),
- once eligibility is determined, and client accepts services, schedule a face-to-face assessment, and
- document diligent efforts made to reach the client before closing.

Note: Other documentation might include a "hotline counseling" call. This is when a CREVAA advocate has spoken with a referred individual that does not require a face-to-face consult. During this

counseling call, the advocate will provide resources and/or explain other services and supports that may assist them with their needs (even when the client does not need other services).

Upon receiving a referral for services, the CREVAA advocate shall verify that the referred individual is eligible for services within ten (10) business days. Clients who are at crisis risk shall be seen as soon as possible. APS will accompany the CREVAA advocate (if possible) on the initial visit after a direct referral is received and evaluated. The CREVAA advocate shall review the CREVAA Participant Authorization with the client and obtain written approval prior to discussing any client-specific personally identifiable information (PII), as defined by the Health Insurance Portability and Accountability Act of 1996 (HIPAA), with any outside entity or person.

Client Transfer Between CREVAA advocates

If a client moves to another district while receiving CREVAA services, the move is not temporary, and the client still needs services, the advocate in the district where the case originated shall:

- Contact the advocate in the district where the individual moved and send the appropriate documentation (to include any necessary release of information) to manage the case. If there is a change in the advocate, a new ROI must be obtained.
- Notify APS of the transfer if there is an open case
- CREVAA advocates, APS, and others involved should work together to ensure that the case is transitioned smoothly from the originating district to the new district.

Ongoing Contact Requirements

Contact must be attempted or maintained at the client's discretion at least every thirty (30) calendar days for the duration of the case. If any of the following circumstances exist, monthly contact by the CREVAA advocate must be completed face-to-face and documented in the case file:

- The AP has access to the client,
- The client could potentially receive retaliation because of the visit,
- The client lacks, or is suspected to lack, capacity,
- The client does not have a working telephone,
- The client cannot communicate adequately by phone due to a speech or hearing impairment,
- There are environmental concerns, or
- Attempts to complete a visit by phone have been unsuccessful.

Attempts to complete a visit by phone should be made well before the thirtieth (30th) day. If phone attempts are unsuccessful, an in-person visit must be completed by the thirtieth (30th) day.

If an in-home service provider is assisting the client, the provider must be contacted to confirm the services are meeting the client's identified needs. If services involve improving the client's living environment, such as homemaker services, an in-person visit is required to confirm the services are adequate to meet the identified need. An in-person visit is required if the appropriateness of services being provided, regardless of the service type, cannot be confirmed by phone.

If the CREVAA advocate is unable to reach a client and has reason or should have reason to suspect the safety of the client or referred vulnerable adult could be at stake, the advocate shall take all appropriate actions including referring to/contacting APS or requesting a wellness check from the appropriate authorities.

Case Closure

APS staff will keep CREVAA cases open until the client's immediate and emergency needs have been met and shall notify the CREVAA advocate prior to APS case closure. If the APS case is closed, the CREVAA case must remain open unless one of the following situations exists:

- Services are complete per the APS plan.
- Information is received/known that indicates a crime did not occur.
- The CREVAA advocate provided client-centered services until the client's risks were reduced/increased safety (verified services are in place).
- The client refuses services.
- There is a waitlist of more than thirty (30) days for a service and the client is not at a crisis or vulnerable risk. For waitlists for clients at a crisis or vulnerable risk, the CREVAA advocate shall inform the APS worker to determine next steps.
- Client moves out of area.
- Client cannot be located.
- Client is deceased.
- Documented pattern of inappropriate behavior including cursing or disrespect toward staff.

Note: If the CREVAA provider is considering closing for any other reason than listed above, APS must be consulted.

Documentation of the closure must be entered on the Monthly Report.

Note: If it is determined that the client still meets APS eligibility, and the APS case is closed, APS staff can and shall continue to support the CREVAA advocate with brainstorming ways around obstacles. However, if any case-related tasks are needed and the client is still at risk, a new report must be made to APS. If a new report is needed, the investigative specialist should consult with their team coordinator. For example, if APS staff need to:

- make a visit(s),
- request (medical) information, or
- make any case related inquiries to others involved in the case that are not state or government entities and/or 1215 recipients.

Changes in Client Circumstances

The CREVAA client may need additional previously unidentified services from the CREVAA program after the APS case is closed. If the additional need does not involve specific assistance, the CREVAA advocate can provide the additional services without APS approval. If the additional need requires specific assistance funding, the CREVAA advocate shall notify the CREVAA Program Manager, to obtain required approval. If the client's situation changes and results in an increased risk, the CREVAA advocate must make a new report with APS.

Eligible Program Services

The CREVAA advocates will provide emergency, client-centered services and resources as specified through related policies, procedures, and the agency's CREVAA contract. These services must be related to the identified needs of the CREVAA client, and they may include, but are not limited to:

1. Emergency housing assistance
2. Emergency food and clothing
3. Home modification
4. Transportation
5. Durable medical equipment
6. Medication
7. Personal care services

8. Homemaker services

Refer to the [Victims of Crime Act Definitions, Allowable and Unallowable Costs and Services](#) for a complete definition of allowable expenses. The CREVAA Program Manager should be contacted with any questions.

The CREVAA provider shall give direct/specific assistance to APS clients in the CREVAA program as identified by APS. APS staff and CREVAA providers shall exhaust other possible payor sources prior to using CREVAA funds.

Program Data Collection and Monthly Reporting

The program will collect and document client information and services and report the data to TDHS on or before the fifteenth (15th) of the month for the preceding month. The CREVAA Monthly Report and client surveys must be submitted to: CREVAA.dhs@tn.gov.

The CREVAA provider shall submit a monthly invoice for reimbursement thirty (30) days after the end of the preceding month to CREVAA.dhs@tn.gov.

Program Records Retention

The CREVAA program will maintain all CREVAA records for six (6) years, which is consistent with the [record retention for APS](#). Paper records may be destroyed after uploading to the CMS.

Program Non-Discrimination

Agencies must establish a written procedure for responding to complaints of discrimination which identifies a person responsible for reporting complaints and findings. The OJCP manual [Chapter XXII](#) contains a full list of laws that protect Civil Rights in federally assisted programs.

Any suspected civil rights violations must be reported to the CREVAA Program Manager or designee immediately. If a formal allegation of Civil Rights discrimination, including those related to employment, or an adverse finding of discrimination against a subrecipient agency by a federal or state court or a federal or state administrative agency, CREVAA providers are required to immediately notify the CREVAA Program Manager and the OJCP Civil Rights coordinator in writing by completing the [Civil Rights Complaint Notification form](#) within forty-five (45) days.

The CREVAA provider shall take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have meaningful access and an equal opportunity to participate in services, activities, programs, and all other benefits through CREVAA providers. All interpreters, translators, and other aids needed to comply with this policy shall be provided without cost to the person being served or their designee and shall be notified of the availability of such assistance free of charge.

Reporting Potential Fraud, Waste, and Abuse, and Similar Misconduct

Providers must display a fraud, waste, and abuse poster (see Appendix) at their agency. If the agency needs this, they should contact the CREVAA Program Manager. A CREVAA provider who suspects potential fraud, waste, abuse, or similar misconduct shall report such to the TDHS Office of the Inspector General (OIG) as soon as possible to:

1. Online submission accessible via the OIG webpage at <https://oig.justice.gov/hotline/contact-grants.htm> (select "Submit Report Online")
2. Mail directed to:
U.S. Department of Justice
Office of the Inspector General, Investigations Division
ATTN: Grantee Reporting
950 Pennsylvania Ave., NW
Washington, DC 205303
3. By fax to the DOJ OIG Fraud Detection Office (Attn: Grantee Reporting) at (202) 616-9881 (fax)

Additional information is available from the DOJ OIG website at <http://www.usdoj.gov/oig>.

- Human Services Fraud Hotline: 1-800-241-2629,
- Within the Nashville Area: (615) 741-7445, or
- Email your information to the InspectorGeneral.DHS@tn.gov

Sub-recipients may also notify the State of Tennessee Comptroller's Office of any illegal acts or irregularities and/or proposed actual actions by contacting their hotline at 1-800-232-5454 or going to their [website](#). Illegal acts include, but are not limited to:

- conflicts of interest,
- falsification of records or reports,
- misappropriation of funds or other assets, and/or
- fraud, waste, or abuse.

IV. Appendix



**Citizens and agencies are encouraged to report fraud,
waste, or abuse in State and Local government.**

NOTICE: This agency is a recipient of taxpayer funding.
If you observe an agency director or employee engaging in any
activity which you consider to be illegal, improper, or wasteful,
please call the state Comptroller's toll free Hotline:

1-800-232-5454

Notifications can also be submitted electronically at:
www.comptroller.tn.gov/hotline



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