

Oversight and Accountability in Massachusetts Aging Services

As conversations about fraud and accountability in health care continue to make headlines, it is important to recognize the strong oversight systems already in place within Massachusetts' aging services network. Aging Services Access Points (ASAPs) follow detailed protocols to monitor and audit all contracted Home Care Agencies providing Homemaker, Personal Care Homemaker, and Home Health Aide services authorized through the state Home Care Program. The information below summarizes key elements of the Executive Office of Aging & Independence (AGE) Provider Monitoring Protocol for ASAPs.

Review Procedures

Initial: All providers must receive an on-site provider monitoring review by an ASAP at least once during the first six months after the first services are provided.

Ongoing: All Homemaker, Personal Care Homemaker, and Home Health Aide providers then receive an on-site provider monitoring review and audit by an ASAP at least once every two years.

As Needed: ASAPs may also conduct an on-site audit when they have reason to believe a home care agency is not complying with contracting requirements.

Monitoring Requirements

All Homemaker, Personal Care Homemaker, and Home Health Agencies must provide detailed information to the ASAP auditing their agency in the following four key areas:

1 Service Capacity

- Number of Homemakers, Personal Care Homemakers, and Home Health Aides employed at their agency
- Overview of workforce capacity initiatives including recent turnover rates, recruitment initiatives, and linguistic and other special capacities
- Detailed description of how staffing is managed day to day, including information on how agency ensures service to high need consumers

2 Staff Qualifications

- Outline qualifications for all supervisory staff (RNs, LPNs, etc.)
- Explain their process, including documentation procedures, for verifying the training qualifications for Homemakers, Personal Care Homemakers, and Home Health Aides employed by their agency

3 Training and In-Service Education

- Describe agency's training processes for Homemakers, Personal Care Homemakers, and Home Health Aides
- Provide information on all entry level and in-service trainings for home care aides provided by agency
- Describe agency protocol for ensuring that all home care aides employed by agency complete all mandatory annual in-service trainings

4 Supervision

- Describe agency procedures for supervision of home care aides
 - Outline the systems and procedures employed to ensure that services are delivered to consumers as authorized
 - Explain how supervisory support is provided to home care aides during non-business hours
 - Attach a copy of their current field supervision report form
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On-site Records Review

During the audit, the ASAP reviews consumer and employee files to ensure compliance with ASAP standards and contracting requirements.

Employee records are reviewed for adherence to the following requirements:

Training Requirements

- Homemaker, Personal Care Homemaker, and Home Health Aide training
- Required Skills/Competency Checklist signed by an RN
- Initial Orientation completed by all Homemaker, Personal Care Homemakers, and Home Health Aides upon hire
- Annual In-service training
 - 6 hours required for Homemakers and Personal Care Homemakers
 - 12 hours required for Home Health Aides

Required Background Checks for Homemakers, Personal Care Homemakers, and Home Health Aides including:

- Massachusetts CORI
- Department of Public Health Patient Abuse Registry
- Monthly checks of Office of Inspector General List of Excluded Individuals and Entities

Health Screening

- TB Test (Annual Screening Questionnaire)

Supervisory Requirements

- RN orientation to plan of care on 1st day of service
- Quarterly Supervisions
- Annual Performance review

Consumer records are reviewed for adherence to the following requirements:

Documentation of Consumer Records

- Consumer demographic and referral information
- Emergency Contacts
- Medical Information
- Personal Care/Home Health Aide Care Plans (if applicable)
- Journal Notes
- Critical Incident Reporting

Off-Site Billing Review

Post-Audit, the ASAP reviews invoicing documentation (timeslips and/or Electronic Visit Verification records) to ensure compliance with ASAP standards and contracting requirements.

Review of Billing Documentation:

- ASAP collects invoice documentation from providers for a sample of consumers who received service in a given month.
- Review of ASAP Service Delivery Report for billing discrepancies
- Review Proof of Service Elements (date/time of service, type of service, location of service, consumer verification)

In Summary

ASAP provider monitoring creates multiple layers of oversight that promote transparency, prevent fraud and misuse, and ensure services are delivered as authorized. By verifying workforce qualifications, service delivery, and billing accuracy, these processes protect consumers while safeguarding taxpayer investments in community-based care.

Quality care depends on strong oversight - and ASAP monitoring delivers both.