



# **The Senior Alliance Annual Vendor Meeting and Training**

December 7, 2021

# Ground Rules

- ▶ Please make sure you are on “mute” throughout the call to limit background noise.
- ▶ Hold all questions until the end of the presentation.
- ▶ Please state your name and the name of the vendor agency you represent before asking a question.
- ▶ At the end of this presentation is an attached document that must be signed and returned to TSA. Please email a signed copy of the last slide to [ewright@thesenioralliance.org](mailto:ewright@thesenioralliance.org) after the presentation is over.
- ▶ All attestations must be submitted by 3PM today (12/7). The attestations will be used to gauge attendance for the meeting. If your agency does not submit an attestation by 3PM, it will be assumed that you have not attended the meeting.

This presentation will be available on TSA’s website:  
<https://thesenioralliance.org/business-partners/>

# New CEO Introduction

Jason Maciejewski

# Agenda

1. Introduction - TSA Staff
2. Updated Contract Information
3. Background Checks and Exclusions
4. General Vendor Requirements
5. OIG/Fraud, Waste, and Abuse
6. Communication and Caregiver Issues
7. Invoicing Information
8. Questions
9. Acknowledgement Signature Page

# INTRODUCTION/CONTACT INFORMATION

<b>Jason Maciejewski</b>	Chief Executive Officer
<b>Jeffery Hawkins</b>	Chief Financial Officer
<b>Kelly Faber</b>	Chief Operations Officer
<b>Lydia Gold</b>	Compliance Officer
<b>Elizabeth Stanley</b>	Director of Programs and Special Projects
<b>Andrew Dabrowski</b>	Director of Community Programs
<b>Gail Wejrowski</b>	CCD Waiver Clinical Manager
<b>Melissa Gaynier</b>	CCD Program Manager
<b>Tara Murphy</b>	CCD Quality and Training Manager
<b>Marissa Birrell</b>	CCD Quality and Training Manager

# INTRODUCTION/CONTACT INFORMATION

<b>Beth Wright</b>	Contracts Manager	734-612-4280	ewright@thesenioralliance.org
<b>Ann Marie Calka</b>	Contracts Specialist		ACalka@thesenioralliance.org
<b>Susan Ross</b>	Accounting Manager	734-716-3331	SRoss@thesenioralliance.org
<b>David Horvath</b>	Accounting Manager	734-776-0195	DHorvath@thesenioralliance.org
<b>Sue Colson</b>	Accounting Specialist	734-776-0223	scolson@thesenioralliance.org
<b>Katie Teachout</b>	Accounting Specialist	734-776-0202	kteachout@thesenioralliance.org
<b>Adiell Childress</b>	Accounting Specialist	734-776-0222	achildress@thesenioralliance.org
<b>Diane Browne</b>	Accounting Specialist	734-727-2081	dbrowne@thesenioralliance.org
<b>Renee Farrugia</b>	CCD Support Specialist	734-727-2051	

# Updated Contact Info

- ▶ TSA mailing address:
  - ▶ PO Box 85570, Westland, MI 48185
- ▶ We prefer that all documentation be emailed to [ewright@thesenioralliance.org](mailto:ewright@thesenioralliance.org).
- ▶ Ask insurance agents to email copies of insurance certificates instead of mailing certificates.
- ▶ Beth Wright TSA cell phone number:
  - ▶ 734-612-4280
- ▶ New Contract Specialist-
  - ▶ Ann Marie Calka
- ▶ Updated regulatory agency -
  - ▶ Aging and Adult Services Agency (AASA) is now Health and Aging Services Administration (HASA)

# New POS Agreements 2022-2024

- ▶ Current POS Agreements end 12/31/21
- ▶ New Agreements will be distributed the week of **December 6, 2021** via email.
- ▶ Agreement has been updated with new language, and has added requirements that were previously in the TSA Operational Guidelines, so please be sure to review.
- ▶ Some of the new items added to the Agreement will be in the next few slides.
- ▶ Please review the Agreement in its entirety for all new items.



# Returning Signed Agreements

- ▶ Please return copies of both MI Choice and MI Health Link Agreements by **December 22, 2021**.
- ▶ Please include an updated copy of your insurance certificate with your signed agreements.
- ▶ Agreements must be sent either via email to [ewright@thesenioralliance.org](mailto:ewright@thesenioralliance.org) or faxed to 734-722-2836.
- ▶ Please ensure that the entire Agreement is filled in and signed on all pages before submitting.
- ▶ TSA will return an executed copy to each Vendor.

# New Contract Highlights

- ▶ HASA Updated Background Check Requirements
  - ▶ This information was originally sent in an email to all vendors on November 4, 2020.
- ▶ Central Registry Clearance Checks
  - ▶ Guidance has recently changed, and language in new contract states that Central Registry Clearance checks no longer need to be completed for employees unless they are serving children.
- ▶ Updated Insurance language
  - ▶ Previously listed in TSA Operational Guidelines
- ▶ Additional language regarding the transportation of participants
  - ▶ Includes seatbelt usage and reporting accidents
- ▶ Updated dispute resolution language
  - ▶ Previously listed in TSA Operational Guidelines

# COVID-19

- ▶ TSA would like to thank all vendors and their workers for continuing to provide services during this very difficult time.
- ▶ Reminder to continue to follow CDC, MDHHS, State and Local guidelines as we move forward during the COVID-19 pandemic.
- ▶ Please continue to ensure your workers have appropriate PPE and are providing services to TSA participants in the safest possible way.
- ▶ For issues that require individual decisions such as caregivers returning to work after leaving the state, Vendors should be creating their own internal policies to follow based on CDC and MDHHS guidelines

# Issues with Staffing

- ▶ There is a staffing shortage throughout Michigan, and this issue has only grown due to the COVID-19 Pandemic.
- ▶ Many vendors have reported issues with hiring workers and consistently staffing cases.
- ▶ TSA receives frequent complaints from participants about not receiving services.
- ▶ If your agency is not able to staff a case, please let TSA staff know immediately so a new vendor can be found.
- ▶ Participants cannot go weeks at a time without receiving services while vendors are searching for new staff.

# Premium Pay Rate Increase for Direct Care Workers

- ▶ Premium Pay was extended through 9/30/22.
- ▶ The new rate for workers is \$2.35, and the new admin rate is \$0.29. The unit rate is \$0.66.
- ▶ TSA will continue to notify Vendors when/if the premium pay rate increase has been extended for home care workers providing designated services.
- ▶ The last attestations that were submitted will continue to be valid throughout any additional extensions of the premium pay rate increase, so additional attestations do not need to be submitted.
- ▶ Continue to reach out to the Fiscal department if you have any issues with the premium pay you received.
- ▶ TSA is required to audit DCW premium pay increase per State requirements. Premium pay documentation needs to be maintained in a way that can be easily tracked and audited.
- ▶ Be sure to indicate on paystubs the change in rate between fiscal years moving forward.

# HASA Background Check Policy

- ▶ TSA had distributed a background check policy from HASA (formerly AASA) last year.
- ▶ Vendors also received a chart comparing the HASA background check policy with the MI Choice and MHL background check policies.
- ▶ The new HASA background check policy has been added to the new POS MI Choice Agreement.
- ▶ HASA procedures will always apply to Care Management and Case Coordination and Support (CM/CCS) participants.
- ▶ In order to ensure that all vendor-hired workers are able to work with any TSA participants, workers should be screened at the highest possible standard per the chart you received.
- ▶ If the worker is chosen by the participant and will only be providing services to that participant, the worker can meet the individual standards of the program that the participant is in.

# Background Check Reminders

- ▶ The following needs to be conducted for employees:
  - ▶ **ICHAT Criminal History Screenings** - Upon hire and every 3 years thereafter
  - ▶ **Federal Sex Offender Registry** - Upon hire and every 3 years thereafter
  - ▶ **Michigan Sex Offender Registry** - Upon hire and every 3 years thereafter
- ▶ TSA can provide instructions on conducting any of the above background checks upon request.

# Criminal History Screenings

- ▶ All vendors must conduct background checks for employees upon hire.
- ▶ Background checks are required for any of the following individuals:
  - ▶ Any individual with ownership interest in the agency
  - ▶ Any individual who is providing services or has direct access to client information
  - ▶ Any person providing services to client that is reimbursed under Medicaid
- ▶ Background checks must be conducted every 3 years at a minimum.
- ▶ **Vendors cannot hire caregivers with mandatory exclusions.**
- ▶ **Caregivers with permissive exclusions can only be hired if:**
  - ▶ **Participant has chosen family/friend to be their caregiver (Personal Choice).**
  - ▶ **Participant signs a waiver stating that they are aware of the permissive exclusion.**
  - ▶ **Caregiver cannot serve any other participants.**
- ▶ Any excludable convictions discovered for current caregivers serving TSA participants must be disclosed to TSA.
- ▶ TSA cannot reimburse any services performed by caregivers who have permissive exclusions (excluding personal choice caregivers) or for any services performed by caregivers who have mandatory exclusions.



# Criminal History Screenings

- ▶ **Employees with any of the following mandatory exclusions must not serve TSA participants under any program:**
  - ▶ Conviction of a criminal offense related to the delivery of an item or service under any federal or state health care program;
  - ▶ Conviction under federal or state law, relating to neglect or abuse of patients in connection with a delivery of a health care item or service;
  - ▶ Conviction of a felony criminal offense relating to fraud, theft, embezzlement, breach of fiduciary responsibility, or other financial misconduct, which occurred after August 21, 1996, under federal or state law, in connection with the delivery of health care items or services or with respect to any act or omission in a health care program (other than those specifically mentioned above), operated by or financed in whole or in part by any federal, state, or local government agency;
  - ▶ Conviction of a felony criminal offense, which occurred after August 21, 1996, under federal or state law, related to unlawful manufacture, distribution, prescription, or dispensing of a controlled substance.

# MHL Permissive Exclusion Process

- ▶ Due to changes made to MDHHS MI Health Link Operating Standards, the MHL Permissive Exclusion Process has changed. This process is being updated in the TSA Operational Guidelines and will be sent out to vendors.
- ▶ Please note that this process only applies to family caregivers hired through the MI Health Link Program. Please use the steps listed below:
  - ▶ TSA contacts vendor to let them know that a family caregiver would like to be credentialed through their agency.
  - ▶ Vendor runs background check and exclusion checks for the caregiver.
  - ▶ If the background check is clean, the vendor sends a vendor view message stating the date that the caregiver was hired.
  - ▶ If there are hits on the background check/exclusions, vendor faxes the results of the background check/exclusions to Attn: Melissa Gaynier at 734-727-2089.
  - ▶ MI Health Link Manager Melissa Gaynier will review the background check/exclusions and make a determination if further action needs to be taken.
  - ▶ If the background check does not have a mandatory or permissive exclusion, vendors will receive a vendor view message stating that the caregiver can be hired.
  - ▶ If the background check has a mandatory exclusion, vendor will receive a vendor view message stating that the caregiver cannot be hired.
  - ▶ If the background check has a permissive exclusion, a vendor view message will be sent to the vendor stating that there is a permissive exclusion. The ICO or TSA will obtain the permissive exclusion form.
  - ▶ Once the permissive exclusion form is signed, TSA will notify the vendor that the caregiver can be hired and will send the vendor a copy of the signed permissive exclusion form for their file.
  - ▶ Vendor sends a vendor view message stating the date that the caregiver was hired.

## Additional Background Check Requirements

- ▶ Vendor must decide whether to prohibit individual from working with participants or accessing information based on background check results.
- ▶ Employees, volunteers, contractors and contractor employees must disclose in writing within 10 days any criminal convictions or pending felony charges.
- ▶ Vendor must not have committed an act of so serious or compelling nature that it affects their current responsibilities.

# Vendor Employee Exclusion List Review

- ▶ Vendors must screen all employees with access to TSA client information through the following regulatory agencies before hire:
  - ▶ Michigan Department of Health and Human Services (MDHHS) Sanctioned Providers List
  - ▶ Office of Inspector General (OIG) Exclusions Database
  - ▶ System for Award Management (SAM) Debarment Search
- ▶ TSA utilizes the service Provider Trust to conduct all exclusion checks for TSA employees.
- ▶ Vendors must conduct exclusion reviews for employees on a monthly basis.
- ▶ Documentation of conducting exclusion reviews must be printed and kept on file.
- ▶ TSA cannot reimburse services performed by individuals who are excluded from receiving State or Federal Medicare/Medicaid funding.
- ▶ Vendors must submit **quarterly** attestation forms to TSA certifying that they have conducted exclusion reviews for all employees.
- ▶ **Attestations are due on January 15, April 15, July 15, October 15 every year.**

# Vendor View

- ▶ CIM has alerted TSA that in the future, Vendor View users for a vendor will not be able to have the same email address.
- ▶ Vendors will need to assign a separate email address to each vendor view and vendor billing user.
- ▶ There will be further notification about this change in the future.
- ▶ TSA will also be reviewing Vendor View and Vendor Billing accounts to ensure that all users for each vendor are active.
- ▶ CIM is also reviewing Vendor View users and may have already reached out to your agency regarding Vendor View users.
- ▶ Please continue to reach out to me if you need to add or delete users.

# Insurance

- ▶ The following insurance is required to be renewed and kept at the required limits throughout the Agreement period:
  - ▶ General and Professional Liability: \$1,000,000 limits minimum, TSA listed as additional insured
  - ▶ Auto Liability: \$1,000,000 limits minimum, TSA listed as additional insured
    - ▶ Transportation vendors with company vehicles must include “scheduled autos”
  - ▶ Worker’s Compensation: \$500,000 limits minimum
  - ▶ Third Party Crime/Dishonesty Bond: \$50,000 minimum per occurrence
  - ▶ Cyber liability: \$500,000 minimum
  - ▶ Sexual Abuse and Molestation Liability: \$500,000 minimum (may be included in General Liability as Abuse Coverage - check with insurance provider)
  - ▶ Employer’s liability: \$500,000 minimum (may be included in Workers’ Compensation - check with insurance provider)
- ▶ TSA must be listed as certificate holder.
- ▶ Vendor is required to have their insurance provider send updated certificates before the expiration date.
- ▶ **If updated insurance is not received by the expiration date, corrective action may be taken, including contract termination.**

# Annual Service Standard Verification (ASV)

- ▶ TSA is requiring that certain documentation be submitted on an annual basis in order to confirm compliance with MDHHS service standards.
- ▶ Updated copies of these documents may be requested at any time throughout the year for audit purposes, which may include licenses, insurance, and certain policies depending on the services being provided.
- ▶ When licenses expire, renewed copies need to be sent to TSA.

# Additional Home Care Standards

- ▶ If caregivers are transporting participants, they must be properly licensed and insured.
- ▶ Family caregivers cannot be the spouse of the participant.
- ▶ Family members who provide home care services must meet the same standards as caregivers who are unrelated to the participant.
- ▶ If the participant is not able to administer their own medications, the medication must be administered by properly trained staff/under the supervision of trained staff.
- ▶ In licensed residential settings (AFC/HFA), the owner/managers of the facility qualify to supervise staff.



# Supervisory Visits

- ▶ Supervisory Visits - RNs are required to perform supervisory visits for H2015 and T1019 services.
- ▶ This standard is from the MI Choice Waiver Operating Standards and MI Health Link Operating Standards.
- ▶ This includes tasks like bathing, incontinence, medication reminders, and dementia care.
- ▶ Vendors must have evidence of 2 supervisory visits performed by an RN per year.
- ▶ When receiving an assessment from TSA, we are looking to make sure that you have an RN on staff to perform visits, and will be looking at Supervisory Visit forms to make sure they are completed by an RN.
- ▶ If you are no longer employing an RN, please let me know.

# Nursing Notes

- ▶ If you provide nursing services, you are required to send monthly nursing notes to TSA through vendor view, or faxed to 734-727-2089. **These must be sent by the 5<sup>th</sup> of the month.**
- ▶ Nursing notes must include:
  - ▶ Summary of participant's current health conditions
  - ▶ Changes in health from previous assessment
  - ▶ Tasks being performed are per physician's orders (Yes/No)
  - ▶ Tasks performed are meeting participant's medical needs (Yes/No)
  - ▶ Additional comments
- ▶ **This is a major compliance issue. TSA may take corrective action up to and including contract termination for those vendors who continuously do not submit nursing notes.**

# Program Operational Guidelines & Standards

- ▶ Vendors should be familiar with MDHHS MI Choice and MI Health Link Minimum Operating Guidelines.
- ▶ TSA is in the process of updating the website to include new MI Choice, MI Health Link, HASA, and TSA Operational Guidelines for FY 2022.
- ▶ These standards show the minimum expectations TSA has for each service performed.
- ▶ The standards can be found at <https://thesenioralliance.org/business-partners/>.

# OIG Reporting

- ▶ Office of Inspector General (OIG) is requiring that certain information be submitted in quarterly reports for MI Choice Waiver participants.
- ▶ TSA will be reporting to OIG any time that any money is deducted from a POS Vendor payment.
- ▶ This includes:
  - ▶ Assessment findings
  - ▶ Billing when services were not provided for any reason, including missed visits, hospitalizations, nursing home admissions, participant not home, etc.
  - ▶ Paper bill edits
  - ▶ Data mining activities

# OIG Reporting

- ▶ The state will now be aware of any time Vendors bill when services were not provided, including deductions in payments from discrepancies at audits and billing when participants are in the hospital.
- ▶ This shows the importance of ensuring that bills are only submitted when services were provided.
- ▶ Vendors should also stress the importance of having proper backup documentation (timesheets) to support all units billed.

# OIG Reporting

- ▶ TSA is also required to send reports to OIG throughout the year regarding the following:
  - ▶ Vendors/caregivers with credible allegations of fraud
  - ▶ Vendors/individuals who are found to have active exclusions
  - ▶ Any time TSA takes adverse action against a Vendor (termination of contract)
  - ▶ Any time TSA requests that the vendor send support documentation before a bill is approved

# Timesheet Accuracy

- ▶ All caregivers should be trained on how to properly fill out timesheets.
- ▶ Importance of accurate timesheets should be stressed.
- ▶ Errors on timesheets/missing components can be considered fraud.
- ▶ Participants should be signing timesheets that accurately describe the services that were provided.
- ▶ **Units should not be billed in vendor billing if there is not an accurate timesheet signed by a participant to support the units.**
- ▶ Timesheet templates can be found on our website at: <https://thesenioralliance.org/business-partners/>
- ▶ **TSA can also provide training on how to properly fill out timesheets upon request.**

# Common Timesheet Issues

- ▶ Participant name should be filled out and spelled correctly.
- ▶ Time in and time out should accurately reflect the time the caregiver arrived and left.
- ▶ Tasks should be checked off for all services completed.
- ▶ Checked off tasks should help show the services the participant received each day and should match services listed on the authorization.
- ▶ Caregivers should be signing off and therefore confirming the services they provided for the week.
- ▶ Participant should only be signing after services have been provided on the same day they were provided.
- ▶ Participant signatures are required for services provided at a residential settings (AFCs, HFAs, Assisted Living, etc), as well as participants living in their own home.
- ▶ Participants should not be signing before the services are provided, or a few days after.
- ▶ Caregivers should not submit pre-filled out/copied timesheets - this is fraud.
- ▶ Caregiver, family members, etc. should not be signing the participant's name for participant. Family members can sign their own name if participant cannot sign. Caregivers can write "unable to sign" if participant cannot sign.
- ▶ **Units should not be billed if there is no participant signature.**



# Timesheet Fraud

- ▶ If TSA reviews timesheets and there is not evidence to support the units billed, TSA must recoup the funds.
- ▶ If any timesheets appear to be fraudulently signed or filled out, TSA is required to report to the Office of Inspector General (OIG).
- ▶ If the participant is in the hospital/nursing home/rehab/deceased and units are billed on these dates, TSA is required to recoup the funds and report to OIG.
- ▶ Vendors must report to TSA if they believe any caregivers are submitting fraudulent timesheets as soon as they are aware of the problem and submit copies of the fraudulent timesheets to TSA.



# Fraud, Waste & Abuse

# Fraud

- ▶ **Fraud** is knowingly and willfully executing, or attempting to execute, a scheme or artifice to defraud any health care benefit program, or to obtain, by means of false or fraudulent pretenses, representations, or promises, any of the money or property owned by, or under the custody or control of, any health care benefit program. The Health Care Fraud Statute makes it a criminal offense to knowingly and willfully execute a scheme to defraud a health care benefit program. This applies to the fraudulent completion and submission of timesheets/cards in order to collect payment for hours not worked, hours above what has been approved by the WA/SC and having the participant sign blank timesheets/cards. Health care fraud is punishable by imprisonment for up to 10 years. It is also subject to criminal fines of up to \$250,000. (CMS)

# Waste & Abuse

- ▶ **Waste** includes overusing services, or other practices that, directly or indirectly, result in unnecessary costs to the Medicare Program. Waste is generally not considered to be caused by criminally negligent actions but rather by the misuse of resources. (CMS)
- ▶ **Abuse** includes actions that may, directly or indirectly, result in unnecessary costs to the Medicare Program. Abuse involves payment for items or services when there is not legal entitlement to that payment and the provider has not knowingly and/or intentionally misrepresented facts to obtain payment. (CMS)

# How To Report

## For Medicare:

- ▶ US Department of Health and Human Services (HHS)
- ▶ Call 1-800-Medicare (1-800-663-4227)
- ▶ TTY users call 1-877-486-2048
- ▶ Online at <https://oig.hhs.gov>

## For Medicaid:

- ▶ Michigan Department of Community Health (MDHHS)
- ▶ Phone (toll free): 1-855-MI-FRAUD (1-855-643-7283)
- ▶ Online: [www.michigan.gov/fraud](http://www.michigan.gov/fraud)
- ▶ Write: Office of Inspector General (OIG), PO Box 30479 Lansing, MI 48909
- ▶ Reports can be made anonymously

# AmeriHealth

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- ▶ **Call:** Anonymous Fraud Tip Hotline at 1-866-833-9718.
- ▶ **Mail:** Special Investigations Unit, 200 Stevens Drive, Philadelphia, PA 19113

# Aetna

- ▶ <https://www.aetnabetterhealth.com/michigan/fraud-abuse>
- ▶ Submit a report on line at the link above or
- ▶ You may prefer to contact their **Special Investigations Unit** by calling **1-866-806-7020** or our **Aetna Medicaid-Medicare Compliance Hotline** number at **1-855-676-5820**.

# HAP

- ▶ Call HAP's Compliance Hotline 24 hours a day at (877) 746-2501.
- ▶ Report possible fraud in writing to HAP and include your contract number, date of service and other information that you think may be useful. Send your report to:

HAP  
Compliance Department  
2850 West Grand Boulevard  
Detroit, MI 48202



# Michigan Complete Health

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- ▶ Compliance Help Line: 1-800-345-1642  
or
- ▶ Fraud Waste and Abuse Line: 866-685-8664

# Reporting Compliance Concerns

- ▶ Concerns can be reported through your agency process or may be reported directly to TSA. To report to TSA:
- ▶ Call 734-722-2830, ext. 2001
- ▶ Email [Compliance\\_Issues@thesenioralliance.org](mailto:Compliance_Issues@thesenioralliance.org)
- ▶ To report anonymously, mail concerns to:  
The Senior Alliance  
Attn: Compliance Officer  
PO Box 85570  
Westland, MI 48185

# Must Review and Distribute to Staff:

- ▶ <https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/Downloads/MedCandDGenCompdownload.pdf>
- ▶ <https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/Downloads/CombMedCandDFWdownload.pdf>

# Sending Secure Emails

- ▶ All emails that contain any participant information, whether they are sent to TSA or anyone else at your agency, must be sent securely.
- ▶ Instructions for sending secure emails to TSA can be sent to Vendors upon request.
- ▶ Caregivers should not be texting/emailing timesheets or any information about participants. All communication regarding participants should be made through HIPAA compliant portals.

# Reporting Participant Status Changes

- ▶ Vendors must report to TSA through vendor view any changes in participant status as soon as they are made aware of the change.
- ▶ This includes admissions to the hospital, nursing home, or rehab facility.
- ▶ Status changes that are not reported can have fraud implications.
- ▶ **Vendors must stress the importance of reporting hospitalizations to all caregivers, including those that are family or friends of the participant.**
- ▶ Caregivers should be made aware that not reporting hospitalizations and/or forging timesheets can jeopardize their ability to continue to care for their family member/friend.

# Communication

- ▶ Vendors are required to keep the lines of communication open and provide ongoing feedback on participants.
- ▶ This includes:
  - ▶ Clearing voicemail boxes so TSA staff can leave messages
  - ▶ Returning voicemails in a reasonable time frame
  - ▶ Checking vendor view messages every 24 hours
  - ▶ Having someone with vendor view access available to check vendor view messages every day during business hours
- ▶ TSA is an expert in community supports and resources. If you identify anyone (participant, family member, caregiver, etc.) in need of resources, please call The Senior Alliance.
- ▶ If your phone is not working temporarily, please let TSA know the best way to contact you for the time being.
- ▶ TSA should be alerted when there is a change in address, phone number, email address etc.
- ▶ **Vendors must not contact participants after services have been stopped with your company.**

# Send a Vendor View Message for:

- ▶ Missed visits by the caregiver for any hours worked less than the care plan
- ▶ Visits/caregiver refused by the participant
- ▶ Participant not home for visit
- ▶ Not able to staff case
- ▶ Falls/accidents/injuries
- ▶ Change in participant mental/physical condition
- ▶ Significant change to informal supports of the participant
- ▶ Problems with the home/environment of the participant
- ▶ Participant admitted to hospital, rehab, or nursing facility
- ▶ Critical incident reporting (after phone call to SC has been made)
- ▶ Changes in vendor view/vendor billing users
- ▶ Changes in contact information, including phone numbers, addresses, EIN number, email addresses, etc.
- ▶ Questions about authorizations
- ▶ Anything containing Protected Health Information (PHI)

**When in doubt, send a vendor view message.**

# Missed Visit Reporting

- ▶ Missed visits should be reported through vendor view AND vendor billing.
- ▶ In vendor billing, all missed visits should be documented using the following codes:

## Missed Visit Codes

**PC - PARTICIPANT CANCELLED**

**VH - VENDOR HOLIDAY**

**PDH - PARTICIPANT DECREASED HOURS**

**VIW - VENDOR INCLEMENT WEATHER**

**PH - PARTICIPANT HOSPITALIZED**

**VNA - VENDOR/WORKER NO SHOW**

**PNA - PARTICIPANT NOT AVAILABLE**

**VNA - VENDOR/WORKER NOT AVAILABLE**

**PNF - PARTICIPANT NURSING FACILITY**

**VS - VENDOR/WORKER SICK**

**PRW - PARTICIPANT REFUSED WORKER**

**VSP - VENDOR/WORKER SCHEDULING PROBLEMS**

**PS - PARTICIPANT SICK**



# Archiving Vendor View Notices/Messages

- ▶ All Vendor View notices and messages should be archived once read within 24 hours of being posted.
- ▶ By archiving a service authorization or assessment, you are accepting the person centered service plan, agreeing to the terms of the authorization, and agreeing to begin services on the authorized start date.
- ▶ All service authorizations and assessments should be printed and placed in participant files once received.
- ▶ Archived messages and notices can still be viewed in the “archived messages” tab.
- ▶ If messages/notifications are not archived, TSA will assume that the message has not been read and Vendor is therefore out of compliance.
- ▶ Vendor View should be checked at a minimum twice per day. A best practice is to keep Vendor View open at all times.
- ▶ Notification through email is only sent through an automated system **twice a day** at 11:30AM and 3:30PM, so do not rely on the email system if you are in immediate need of an authorization.

# Common Caregiver “Don’ts”

- ▶ Caregivers/staff should be trained not to:
  - ▶ Discuss personal/financial problems with or in front of participants
  - ▶ Bring children, pets, or other family members to the homes of participants
  - ▶ Attempt to convince participants that they need more hours/services
  - ▶ Solicit participants to receive other services offered by the vendor, including services not covered by the MI Choice, MI Health Link, or CM/CCS programs
  - ▶ Discuss participant information in front of another TSA participant, as this is a HIPAA violation
  - ▶ Dress inappropriately/out of work uniform. Caregivers should be dressed professionally and have picture ID/name badges on them
  - ▶ Use cellphones while at the home of participants
  - ▶ Sleep on the job
  - ▶ Use participant personal items
  - ▶ Smoke in participant homes
  - ▶ Smoke before/after/during the transportation of participants

# Caregivers Working on Holidays

- ▶ If you are authorized to provide services that fall on a holiday, your agency must ensure that services are provided that day.
- ▶ Unless it is agreed upon with the participant that services will be performed on a different day or are all together canceled, Vendor must continue to provide services on holidays.
- ▶ Vendors must ensure that TSA and applicable participants are notified if services are moved or canceled due to a holiday.

# Updated Fiscal/Programmatic Assessments

- ▶ Fiscal/Programmatic assessment procedures were updated midway through FY 2020, and are currently being conducted virtually, as opposed to on-site.
- ▶ TSA will now be sending vendors a list of documents that need to be pulled before the assessment, and documents will need to be submitted electronically.
- ▶ Documents that would need to be submitted include but are not limited to:
  - ▶ A sample of employee personnel files, which include background checks, training records, new hire documentation, etc
  - ▶ A sample of participant files, which include authorizations, assessments, progress notes, etc
  - ▶ Selected timesheets
  - ▶ Licenses
  - ▶ Proof of insurance
  - ▶ Policies and Procedures
  - ▶ Selected Payroll, that must include evidence of premium pay if applicable
- ▶ TSA reserves the right to assess providers at any time during the fiscal year, to conduct a secondary audit select a larger sample size, or to take corrective action up to termination.

# Vendor Audit Portal

- ▶ TSA is now using an online Vendor Audit Portal to conduct assessments.
- ▶ This is a secure website where Vendors can submit their audit documentation.
- ▶ In order to access Vendor Audit Portal, you will need a free Microsoft Office Account and will need to use the Microsoft Authenticator app.
- ▶ Directions on setting up your account and gaining access to the Vendor Audit Portal will be sent 30 days before your audit documentation is due.
- ▶ We prefer that you submit documentation in the following manner:
  - ▶ Submit one PDF per employee that has all required employee file documents (do not separate background checks, training, references etc. into separate files).
  - ▶ Keep timesheets in PDFs in alphabetical order per participant, and in date order. Unorganized timesheets lead to TSA staff missing timesheets and assuming they were not submitted.
  - ▶ Please use the correct categories offered when uploading documents (i.e. place insurance certificates under the “Insurance” category).
  - ▶ Make sure you upload timesheets for all participants given on the list from TSA. You would receive the list at the same time you are notified that you are receiving an assessment.
  - ▶ Ensure that scans of timesheets are easy to read.

# Authorizations/Billing

- ▶ Units billed will only be approved if they are within the weekly amount authorized (Sunday - Saturday)
- ▶ “Times and days may vary” must exist within the weekly amount authorized. **Please verify that all applicable authorizations state “times and days may vary” if you are billing on dates outside the care plan.**
- ▶ Example - If a participant is out of town for one week, they cannot make up their hours the following week.
- ▶ The dates that services were provided on should always match the dates billed.

# Additional Billing Reminders

- ▶ If you receive authorization for both Homemaking and Personal Care services, do not go over either the Homemaking or Personal Care weekly authorized units.
- ▶ Make sure that units are not billed when authorizations are stopped for the participant being in the hospital.
- ▶ Vendors should bill by the timesheets, not by the care plan.
- ▶ Home care vendors who receive authorizations for transportation mileage must have a corresponding log documenting the mileage in order to bill.

# Invoicing Information

- ▶ Do not perform services until you have received WRITTEN authorization via Vendor View.
- ▶ If you do not receive Vendor View authorization within 2 business days, immediately call the Supports Coordinator or send a Vendor View message. Your invoice may be rejected.
- ▶ Monthly billing is due by the 5th of each month.
- ▶ Vendors cannot bill participant over and above what TSA reimburses vendors.
- ▶ Billing should only be submitted once per month. Please do not send multiple batches per billing cycle. If you receive late timesheets after your billing has been submitted, please submit the following month.
- ▶ Payments are released the Friday following the fourth Thursday of the month unless otherwise noted. Vendors will be contacted via Vendor View with any changes or variation to this schedule.
- ▶ Please cash checks in a timely manner.
- ▶ Paper bills and Summary Sheet are required when submitting additional units for dates that have already been posted in Vendor Billing. The forms and instructions are available on the TSA website:  
<https://thesenioralliance.org/business-partners/>



# ACH Form

- ▶ TSA is requiring that POS Vendors utilize ACH payments.
- ▶ Completed forms can be emailed to [ewright@thesenioralliance.org](mailto:ewright@thesenioralliance.org)
- ▶ When filling out the ACH form, please be sure that the routing number and account numbers are filled out correctly.
- ▶ If an account number is entered wrong on the form, TSA is not responsible for missing payments.
- ▶ ACH forms can be found on the website: <https://thesenioralliance.org/business-partners/>

# Training

- ▶ TSA is mandating that the following trainings be completed by staff on an annual basis:
  - ▶ Cultural Competency/Awareness of Personal Prejudices
  - ▶ ADA Compliance
  - ▶ Disability Awareness/Chronic Conditions
  - ▶ Person Centered Planning
  - ▶ Critical Incident/Abuse and Neglect Reporting
  - ▶ Fraud, Waste, and Abuse, Including 2 Medicare Compliance Trainings
  - ▶ HIPAA Compliance
- ▶ These trainings will be available to Vendors through a provided PowerPoint presentation, which can be directly used to train staff.
- ▶ It is the responsibility of the vendor to make sure their staff is trained in these areas on an annual basis.
- ▶ Any new employees hired throughout the year must be trained on these materials as well.
- ▶ Please sign and submit the attestation form stating that trainings will be distributed to staff after this meeting.
- ▶ TSA will be scheduling a Diversity, Equity, and Inclusion training in the future for all Vendors to attend.

# Abbreviations

- ▶ MHL - MI Health Link
- ▶ MDHHS - Michigan Department of Health and Human Services
- ▶ CIM - Center for Information Management Inc.
- ▶ CHAMPS - Community Health Automated Medicaid Processing System
- ▶ EVV - Electronic Visit Verification System
- ▶ HASA - Health and Aging Services Administration
- ▶ OIG - Office of Inspector General
- ▶ SAM - System for Award Management
- ▶ CCD - Community Care Department
- ▶ POS - Purchase of Service
- ▶ NEMT - Non-Emergency Medical Transportation
- ▶ SC - Supports Coordinator

Questions?



The background features a series of overlapping, semi-transparent blue geometric shapes, primarily triangles and trapezoids, that create a sense of depth and movement. The colors range from a light sky blue to a deep, dark navy blue. The shapes are layered, with some appearing to recede into the background while others are more prominent in the foreground.

**Thank you for  
attending  
The Senior  
Alliance  
Annual Vendor  
Meeting and  
Training**

# References

- ▶ <https://courses.mihealth.org/MIHealthLink/home.html>
- ▶ <https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/Downloads/HIPAAPrivacyandSecurity.pdf>

Acknowledgement of Attending  
The Senior Alliance  
Annual Provider Meeting and Training

December 7, 2021

I acknowledge that I have attended The Senior Alliance Annual Provider Meeting and Training as a representative of my agency. I understand that the organization I represent must follow these Guidelines and Operational Standards to ensure payment for services provided and continuation of agreement with The Senior Alliance. I attest that the training topics discussed in this presentation will be covered annually with all staff, and evidence of these trainings will be kept in employee files.

Agency name: \_\_\_\_\_

Agency representative's printed name: \_\_\_\_\_

Agency representative's signature: \_\_\_\_\_

Date: \_\_\_\_\_