### The Senior Alliance Annual Vendor Meeting and Training

# April 29, 2025



# **Ground Rules**

- Make sure your phone is muted or on vibrate.
- Hold all questions until the end of each section.
- Please state your name and the name of the vendor agency you represent before asking a question.
- Please ensure that you have signed in at the desk outside of the auditorium.
- At the end of this presentation is an attached document that must be signed and returned to TSA. Please leave a signed hard copy at the sign-in table before you leave.
- Be sure to take some refreshments before you leave.

This presentation will be available on TSA's website:

https://thesenioralliance.org/providers/

TSA brochures are available to take before you leave as well.

# Agenda

- 1. Introduction CEO and TSA Staff
- 2. New and Upcoming Requirements
- 3. Background Check Information
- 4. OIG/Fraud, Waste, and Abuse
- 5. General Vendor Requirements
- 6. Community Care Requirements
- 7. Assessment Information
- 8. Fiscal Updates
- 9. Direct Care Worker Fund
- 10. Fall Prevention Tips
- 11. Questions
- 12. Residential Services Training

# INTRODUCTION/CONTACT INFORMATION

Jason Maciejewski	Chief Executive Officer	
Kelly Faber	Chief Operations Officer/Deputy Director	
Jeffery Hawkins	Chief Financial Officer	
Lydia Gold	Chief Compliance Officer	
Andrew Dabrowski	Chief Program Officer	
Amanda Sears	Chief Community Impact Manager	
Gail Wejrowski	CCD Waiver Clinical Manager	
Melissa Gaynier	CCD Program Manager	
Sarah Driscoll	CCD Program Manager	
Tara Murphy	CCD Waiver Services Manager	
Marissa Colling	CCD Quality and Training Manager	
Katherine Zurenko	CCD Quality and Training Manager	

# **INTRODUCTION/CONTACT INFORMATION**

Beth Wright	Contracts Manager	734-612-4280	ewright@thesenioralliance.org
Sherry Smith	Contracts Specialist	734-516-2697	ssmith@thesenioralliance.org
Susan Ross	Accounting Manager	734-716-3331	SRoss@thesenioralliance.org
David Horvath	Accounting Manager	734-776-0195	DHorvath@thesenioralliance.org
Katie Teachout	Accounting Specialist	734-776-0202	kteachout@thesenioralliance.org
Diane Browne	Claims Resolution Specialist	734-727-2081	dbrowne@thesenioralliance.org
Renee Farrugia	CCD Support Specialist	734-716-7933	
Nicole Wynn	MHL Support Specialist	734-765-8508	

\*Shanon Astin still works at TSA but is no longer in the Support Specialist role.

# New and Upcoming Requirements

# **Updated Contact Info**

- TSA new address:
  - 3200 Greenfield Suite 100 Dearborn, MI 48120
- We prefer that all contract documentation be emailed to <u>ewright@thesenioralliance.org</u>.
- Ask insurance agents to email copies of insurance certificates instead of mailing certificates.
- Please note that TSA staff are not in the office 5 days a week. Many staff members are out of the office multiple days a week for audits, participant assessments, off-site meetings, trainings, events, etc.
- Please make appointments ahead of time when looking to visit TSA staff at the office.

EVV

- MDHHS required the use Electronic Visit Verification (EVV) systems beginning in September 2024.
- MDHHS worked with the company HHAeXchange to create an EVV system that vendors can use for free.
- Vendors can also use their own systems, as long as they are meeting the minimum requirements that the HHAX system is meeting.
- Vendors need to be registered with HHAX even if they are using a different EVV system. This is needed to access client information.
- This applies to Vendors providing in-home care services for MI Choice Waiver and MHL participants.
- Currently, this does not apply to licensed settings, residential settings, nursing, and vendors working at residential settings.
- EVV is currently still in a **soft launch** period.
- Vendors providing applicable services are required to use EVV, but billing is not yet linked to EVV.

# EVV

- If you are having any issues finding participants in the HHAX system, refer to our troubleshooting guide. Copies are available at the sign-in desk.
  - Make sure that the participant is in the MI Choice or MHL program CM/CCS participants will not be in HHAX.
- TSA will be reviewing EVV logs during audits based on the punches documented. This means that if the worker has punched incorrectly, this needs to either be corrected in your EVV system, or your billing needs to reflect the punches as they are.
- Once billing is linked to EVV punches, there may be little opportunity to make corrections to the billing outside of what is submitted by the EVV system.

# **IT Security Audit**

- TSA will be performing an IT Security Audit with applicable vendors.
- This audit will be completed through the Vendor Audit Portal.
- It will be rolled out to vendors gradually.
- The first step of the process will be to complete the survey so TSA can understand what security measures your agency currently has in place.
- This will be a slow process. Vendors are not required to implement any items that they are missing immediately.
- TSA will work with Vendors throughout the process.

### **Vendor View Updates**

- Compass was updated in October 2023. It now includes Vendor View and Billing.
- Attachments are now available to send through Vendor View. <u>Please use this feature to send documents or</u> <u>information containing PHI to Supports Coordinators/TSA</u> <u>staff. This includes nursing notes.</u>
- TSA is currently looking into the new non-service feature in Compass and will issue guidance on this in the future.
- TSA attends monthly meetings with CIM to get updates and give feedback on new issues that we find.

# Background Check Review

# **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
  - OIG, SAM, and MDHHS Exclusion Checks Upon hire and monthly thereafter
- Transportation providers also need to conduct drivers history checks for their drivers upon hire.
- 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
- 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 <u>mandatory exclusions</u> 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.

# **Vendor Employee Exclusion List Review**

- <u>Vendors must screen all employees with access to TSA client information through the following regulatory agencies before hire:</u>
  - 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.

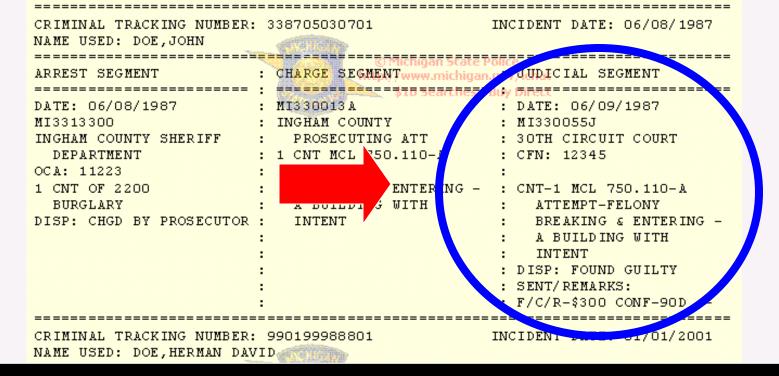
# **MHL Permissive Exclusion Process**

- <u>Please note that this process only applies to family caregivers hired through the MI Health Link</u> <u>Program.</u> 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.

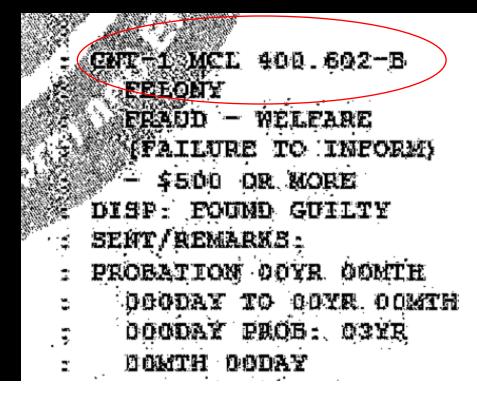
# Additional Background Check Requirements

- 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.
- If you are utilizing a background check company for your agency, you must ensure that it checks ICHAT and is going back to at least 1996. This ensures that all mandatory exclusions are ruled out.
- Individual drivers who have ANY of the following convictions in the past two years will be excluded as an NEMT provider:
  - More than two moving violations
  - Operating While Intoxicated (OWI)
  - Driving Under the Influence (DUI)

# Background Check Reviewing Tips



The judicial segment will contain information about the conviction and sentence and is provided by the court. F/C/R refers to fines, costs, and restitution; PROB refers to probation; and CONF refers to jail/prison time in years (Y), months (M), and days (D). If the background check lists out an abbreviation that you do not understand or recognize, a best practice is to look up the charges to make sure that they are not mandatory exclusions. In this case search "MCL 400.602 B" to find:



#### Section 400.602

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#### THE MEDICAID FALSE CLAIM ACT (EXCERPT) Act 72 of 1977

#### 400.602 Definitions.

Sec. 2.

As used in this act:

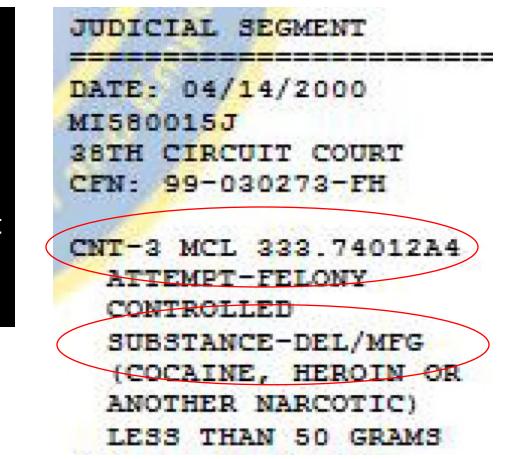
(a) "Benefit" means the receipt of money, goods, or anything of pecuniary value.

(b) "Claim" means any attempt to cause the department of community health to pay

Here is another example. If you are not sure what DEL/MFG means, a search of "MCL 333.7401" will show you the below excerpt, which confirms that this is a mandatory exclusion:

#### Section 333.7401

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#### PUBLIC HEALTH CODE (EXCERPT) Act 368 of 1978

333.7401 Manufacturing, creating, delivering, or possessing with intent to manufacture, create, or deliver controlled substance, prescription form, or counterfeit prescription form; dispensing, prescribing, or administering controlled substance; violations; penalties; consecutive terms; discharge from lifetime probation; "plant" defined.

# General Vendor Requirements

### 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.

### **Home Care Standards**

- If caregivers are transporting participants, they must be properly licensed and insured.
- Family caregivers <u>cannot</u> 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 or RN.
- If a participant requires a service/task that a caregiver does not know how to complete, the supervisory RN should train the caregiver to complete the task. If RN is not available, vendor should not take the case.
- Vendors should not be recruiting participant family members to be workers. If a caregiver quits and no replacement is available, please let the SC know. If a family member expresses interest in being a paid caregiver, please let the SC know so the situation can be assessed.

# **Supervisory Visits**

- Supervisory Visits RNs are required to perform supervisory visits for H2015 and T1019 services.
  - LPNs do not qualify under these standards.
- 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. We 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.

# 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.

# **Archiving Vendor View Notices/ Messages**

- <u>All Vendor View notices and messages should be archived once read within 24 hours of being posted.</u>
- By archiving a service authorization or assessment, you are accepting the personcentered 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/saved 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 <u>at a minimum twice per day.</u> 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.

# **TSA Website**

### https://thesenioralliance.org/

You can find the following documents on TSA's website:

- Medicaid Provider Manual (MI Choice Waiver Standards)
- MHL Standards
- TSA Operational Standards
- ACH Form
- Timesheet Template
- Vendor View Registration Form
- Annual Vendor Meeting PowerPoint
- Training Materials for Caregivers

#### You can also find:

- MI Choice Waiver Referral form
- TSA Resource Database
- Contact Information
- Information about TSA programs

# 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) 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 <u>https://oig.hhs.gov</u>

For Medicaid:

- Michigan Department of Community Health (MDHHS)
- Phone (toll free): 1-855-MI-FRAUD (1-855-643-7283)
- Online: www.michigan.gov/fraud

Write: Office of Inspector General (OIG), PO Box 30479 Lansing, MI 48909

Reports can be made anonymously

# **How To Report**

# HAP/ CareSource

- Fraud Hotline: 1-800-488-0134 (Follow the prompts for reporting Fraud)
- Use the Fraud, Waste and Abuse Reporting Form on <u>www.caresource.com</u>
- Write a letter and send to:

CareSource Attn: Special Investigations Unit P.O. Box 1940 Dayton, OH 45401-1940

- Options for reporting that are not anonymous:
  - Email: <u>Fraud@CareSource.com</u>
  - Fax: 1-800-418-0248



# Meridian/ Fidelis

- 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 734-776-0580
- Email <u>Compliance\_Issues@thesenioralliance.org</u>
- To report anonymously, mail concerns to:
  - The Senior Alliance Attn: Compliance Officer 3200 Greenfield, Ste. 100 Dearborn, MI 48120

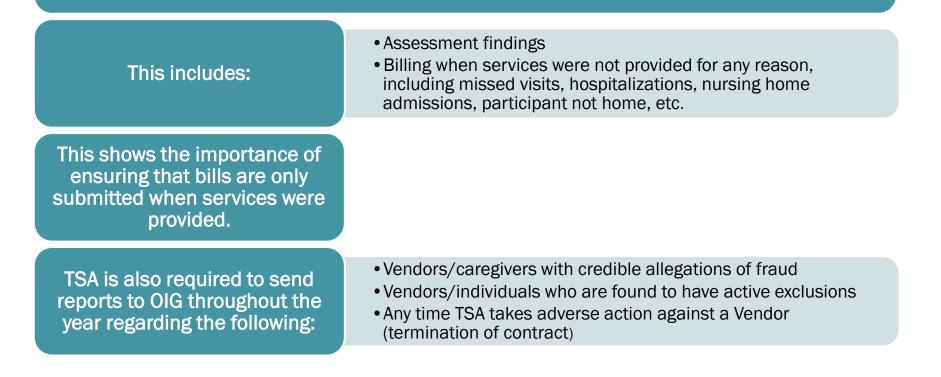
### <u>Must Review and</u> Distribute to Staff:

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/CombMedCandDFWAdownload.pdf

### **OIG Reporting**

Office of Inspector General (OIG) is requiring that TSA report to OIG any time that any money is deducted from a POS Vendor payment.



## **Community Care Requirements**



- If you provide nursing services under HCPCs T1000, T1002, and T1003, you are required to send monthly nursing notes to TSA through vendor view messages or attachments.
- <u>Please do not send nursing notes through email for security</u> <u>purposes.</u>
- These must be sent by the 5<sup>th</sup> of the month.
- TSA has a nursing notes template available on the next slide.
- This is a major compliance issue. TSA may take corrective action up to and including withholding payment and/or contract termination for those vendors who continuously do not submit nursing notes.

### **Nursing Notes**

### **Nursing Notes Template**



Per MDHHS requirements, all vendors providing Private Duty Nursing (T1000) or Nursing Services (T1002/T1003) are required to send monthly nursing notes by the 5th of the month for each participant receiving one of the services mentioned above. Nursing notes can be sent through vendor view, or can be sent through a standardized form upon request. The following information is needed in the nursing notes:

Participant Name:

\_Month:

#### Private Duty Nursing Notes Completed By:

1. Summary of Participant's current health conditions:

2. Changes in health from previous assessment:

3. Tasks being performed are per physician's orders (yes/no)

### **Medication Set Ups**

- If you are authorized to perform medication set ups through an RN/LPN, the following steps need to be taken:
  - Contact the physician to obtain a current medication list prior to setting up the medications. Vendors should not use the medication list given through Vendor View, as this may not be up-to-date. Vendor should send updated medication list or notify TSA of change.
  - Contact the participant two days before the visit to verify that all prescriptions have been filled and are available for set-up. If the participant is not able to get the prescriptions filled, contact the participant's Supports Coordinator (SC) to discuss the situation.
  - If the participant reports that the medications have changed, contact the physician to confirm. If the participant gives information that is different than the medication list provided by the physician, do not assume that the participant fully understood the physician's instructions.
  - Contact the SC through vendor view/phone to address any issues or concerns within two business days.
  - Nursing Notes need to be submitted monthly via vendor view.



### **Critical Incident Reporting**

- This is a reminder to Vendors to report all critical incidents to Supports Coordinators within 2 days of the incident/knowledge of the incident.
- Vendors should call SCs right away to report the critical incident.
- After calling the SC, Vendors should send a written report or vendor view message giving the details of the incident within 24 hours of calling the SC. All details that can be provided are helpful, and Vendors should include direct quotes when possible.
- If Vendor receives any additional information on the incident after the initial report, the SC should be updated continually.
- TSA expects that Vendor/Vendor staff will call APS, emergency services, and/or LARA depending on the situation.
- Critical incidents that need to be reported include but are not limited to medication errors, theft, neglect, exploitation, any type of abuse, illegal activity in the home, missed visits for those with critical care needs, elopement, or suspicious/unexpected death.

### **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 and email so TSA staff can leave messages
  - Returning voicemails within one business day for participant issues
  - 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
- Decline or improvement 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.

### **Common Caregiver "Don'ts"**

- Caregivers/staff should be trained <u>not to</u>:
  - Discuss personal/financial problems with or in front of participants
  - Bring children, pets, or other family members to the homes of participants
  - Bring participants to the homes of caregivers
  - 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



## **Assessment** Information

### Updated Fiscal/ Programmatic Assessments

- TSA will 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
  - Timesheets/EVV logs for all participants listed on sample form
  - Licenses
  - Proof of insurance
  - Policies and Procedures
  - Selected Payroll, that must include evidence of premium pay if applicable
  - Bank statements to be traced to payroll
- After the first submission of documentation is reviewed, TSA will send a follow up corrective action letter scheduling on on-site visit to review any missing documentation.
- 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 utilizing an online Vendor Audit Portal to conduct assessments. This is a secure website where Vendors can submit their audit documentation.
- In order to access the 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.
- Please attempt to login to the audit portal when you first receive your assessment notification.
- If you are having issues accessing the portal, please let me know right away so we can troubleshoot any issues.
- If you are getting access to the portal for the first time, you will be receiving an email from Microsoft Invitations with the link to sign up for access.

### **Vendor Audit Portal**

- We prefer that you submit documentation in the following manner:
  - Label all documents with descriptive names. Do not leave the generic scan name on the document.
  - Submit one PDF per employee that has all required employee file documents (do not separate background checks, training, references etc. into separate files). Zip Folders can also be submitted.
  - Keep timesheets or EVV logs in PDFs or Zip folders 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 or EVV logs 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 paper timesheets are easy to read. If you submit a scan that we are not able to read, we will not be able to use it as evidence that services are provided.

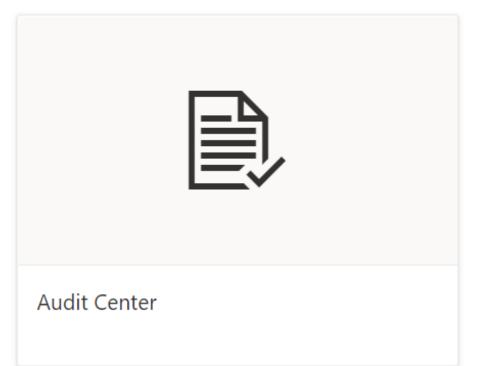
### Additional Audit Portal Instructions

 To access the portal, please use the following link:

https://tsalink.sharepoint.com/sites/Welcome ExternalUsers

•Once you get to the Welcome Page, click the Audit Center link.

•Do not save the audit center direct link. The best way to get to the app is through the link above.



 If you have used the portal before, you should be able to see your past submissions.

•For a new audit year, all vendors should start a new submission using the **New Audit** button.

Vendor Audits			New Audit	$\bigcirc$
	New	>		
, and the second se	Submitted By Vendor	>	Welcome to TSA Vendor Audit System	
<b>Test</b> Ali		>		
Last Activity: 7/28/2022 4:12 PM	New			

### Additional Audit Portal Instructions

### Additional Audit Portal Instructions-Uploading Documents

Method 1 (Using Quick Upload):

- Select the document using the file selector. You can only upload 1 document at a time. However, you can upload multiple documents at a time by putting them in a Zip folder.
- Select a document type. You must select a document type, or the file will not be accepted.
- Hit the upload button and wait for the success message.

Audit:	Vendor: Test	Status: New
Test		tools. 4. Once all required documentation has been uploaded, hit "Submit for Review."
* Vendo Ali	or Representative	Note: You will not be able to remove files after you submit the audit for review.
* Vendo aaljish		Instructions and Templates
ASSES	SMENT DATE	FY 2022 Fiscal Monitoring Tool Revised.xlsx      POS Vendor Audit Portal Instructions 2022.docx
CONT	RACT PERIOD COVERED TO /2001	TSA PROVIDER MONITORING TOOL 2022.docx
Quick Upl	load	
	TSA External User Sign Up Procc	Document Type
Max.	number files reached.	Fiscal Documentation (Transportation Logs) Upload

#### Method 2: Document tab at the bottom of the Audit Portal Page

- The steps to upload documents are the same as the Quick Upload instructions.
- You can only upload 1 document at a time. However, you can upload multiple documents at a time by putting them in a Zip folder and uploading 1 Zip folder at a time.
- Under this tab you will be able to see your uploaded documents/Zip Folders and can confirm that all of your documents have been uploaded.

Ocuments					
Upload Files		TSA Audit System.docx Fiscal Documentation (Nursing Notes)			
There is nothing attached.	Document Type	8/10/2022 4:08 PM	ID: 4853	Ū	
🔰 Attach file	~				
*Max.number of files reached: Must Upload one file at a time					
	Upload				

### Additional Audit Portal Instructions-Uploading Documents

### **Site Assessment**

- TSA is required to conduct a portion of the assessment on-site.
- The date for the on-site assessment is sent with the initial assessment letter.
- We are reviewing the documentation listed in your CAP letter at the onsite assessment. This documentation does not need to be emailed prior to the assessment.
- If this date does not work for you, please let me know as soon as possible.
- Please be ready and available at the assessment date and start time. If TSA is not able to attend the assessment, or will be late, we will contact you.
- Please keep lines of communication open during the on-site assessment date.
- Please be considerate of TSA's time when it comes to being prepared and available for the assessment.

## **Fiscal Updates**

# Minimum Wage and Earned Sick Time Act - Effective 2/21/2025

- Minimum Wage Increased to \$12.48.
- DCW Premium Pay must be paid in addition to minimum wage.
- Per the new Earned Sick Time Act employees earn 1 hour of paid sick leave per 30 hours worked.
- There are different rules for business classified as small vs. large businesses.
- Note: This summary is for informational purposes only. Vendors are encouraged to consult legal counsel to ensure compliance with current requirements.

### **Timesheet/EVV Accuracy**

- All caregivers should be trained on how to properly fill out timesheets and/or use EVV.
- Importance of accurate timesheets and/or EVV punches should be stressed.
- Participants should be signing timesheets that accurately describe the services that were provided.
- Units should not be billed if there is not an accurate timesheet to support the units.
- Programs/services that don't use EVV and live-in caregivers are still required to obtain participant signature.

### **Timesheet/EVV Fraud**

- If TSA reviews timesheets and/or EVV logs and there is not evidence to support the units billed, TSA must recoup the funds.
- <u>Vendors must report to TSA if they believe any caregivers</u> are submitting fraudulent timesheets and/or EVV punches as soon as they are aware of the problem and submit copies of the fraudulent timesheets to TSA.

### **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. The dates on timesheets should be in week order, and not document multiple dates with one participant signature/initial.
- 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.

### Premium Pay Rate Increase for Direct Care Workers

- Premium Pay was extended through <u>9/30/25</u>.
- The rate for workers is \$3.40, and the admin rate is \$0.44. The unit rate is \$0.96.
- This is required for any Vendor that is contracted for the service codes H2015, T2033, S5100, S5150, S5151, S5130, and T1019, regardless of the setting.
- TSA will continue to notify Vendors when/if the premium pay rate increase has been extended for home care workers providing designated services.
- Continue to reach out to the Fiscal department if you have any issues with the premium pay you received.
- TSA is <u>required</u> 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. This must
  be a <u>separate</u> line item on the check/paystub that indicates "PREMIUM PAY" or a description along
  those lines. The paystub must show the premium pay rate.
- Be sure to indicate on paystubs the change in rate between fiscal years moving forward, as needed.

### Payroll and Bank Statement Testing – Fiscal Assessment

In order to meet MDHHS audit requirements, TSA is requiring that Vendors send copies of banking records showing payment to selected sample of caregiver(s) as part of the assessment. This must include the following:

- Bank statement with a line showing payment to the selected caregiver for the payroll period.
- If the caregiver is paid through direct deposit, a payroll report showing the net pay for the selected caregiver, as well as the total net pay for the pay period matching the debit to your bank account.
- If the caregiver is paid by check, a payroll report showing the caregiver's net pay for the period selected.
- All caregivers should have provided services to the participants selected by TSA as part of the assessment sample.

Feel free to redact any bank statement information not pertinent to completing the above requests. This could include account numbers and balances.

### **Single Audit**

- TSA is required to review all single audit reports as part of our annual vendor assessment.
- Many of our vendors do not meet the minimum requirement to receive a Single Audit.
- Required by all entities who expend \$750,000 or more of Federal Financial Assistance in a fiscal year. More detailed requirements can be found reviewing The Single Audit Act.



- 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.
- 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 should always match the dates billed.
- TSA will not provide an authorization, assessment, and/or medication list to a vendor until it has been confirmed that the vendor has a worker in place and services will be starting on a specific date.

### Authorizations/ Billing

### **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 participant is in the hospital.
- Vendors should bill by the timesheets/EVV logs, 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 <u>WRITTEN</u> 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 <u>once per month</u>. Please do not send multiple batches per billing cycle for the same month of service. If you receive late timesheets after your billing has been submitted, please submit the following month.
- Payments are released on or before 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.
- Due to vendor ability to include additional billing lines in Compass billing for days already billed "paper bills" are no longer necessary.
- Contact the billing department staff for any overbilling issues that require adjustments to previously billed units.

### **ACH Form**

- TSA requires that Vendors utilize ACH payments.
- If vendors need to change ACH payment information they can submit a Vendor Payment Authorization Form. Please be sure that the routing number and account number are filled out correctly. If an account number is entered incorrectly on the form, TSA is not responsible for missing payments.
- Vendor Payment Authorization Forms can be found on the website: <u>https://thesenioralliance.org/providers/purchase-of-</u> <u>service-vendors/</u>
- Completed forms can be emailed to <u>ewright@thesenioralliance.org</u>

### **Abbreviations**

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

### **Questions?**



## Direct Care Worker Needs Fund

- The Direct Care Worker Needs Fund is available to assist a direct care worker, employed by a TSA contracted vendor, providing care to a TSA client.\*\*
- Designed for your employees who are experiencing hardship which is preventing them from being able to meet the requirements of their position as a direct care worker.
- A limited amount of funds has been designated for this program and all requests submitted are subject to funding availability.



\*\* Limited funding available this year for any active (full-time, consistent part-time) DCW

### DCW Needs Fund Application



#### Alliance

#### DIRECT CARE WORKER NEEDS FUND APPLICATION

seeks

#### Employee Unexpected Hardship

As a contracted Vendor with The Senior Alliance, Area Agency on Aging 1-C, \_\_\_\_\_\_ assistance for our employee to help resolve an unexpected hardship that is a barrier for the employee to fulfill their responsibility to provide care to The Senior Alliance, AAA 1-C clients.

□ Tire or Tire Repair □ New Car Battery □ Minor Car Repair

Other

We have determined the need is of the employee's alone and we will not be accepting funds on behalf of anyone else other than the employee. Generally, this excludes live-in caregivers.

We understand that employee unexpected hardship assistance will be provided by The Senior Alliance, Area Agency on Aging 1-C to the employee only once during a twelve-month period. Repeat applicants will be approved at TSA's discretion.

Employee Name:

Amount Requested: \_\_\_\_\_\_ (Maximum amount is not to exceed \$500.00)

Is the employee assisting a TSA Client? Yes\_\_\_\_ No\_\_\_\_ TSA Client's Name: \_\_\_\_\_\_

Is the employee a live-in caregiver? Yes\_\_\_\_ No\_\_\_\_

Summary of the Situation (Why are you needing this assistance? Please attach quote to application.):

Employer/Vendor Agency Name

Employer Authorized Signature

Date

TSA RESPONSE

Amount Approved \_\_\_\_\_

Denied

The Senior Alliance, AAA1-C Representative Date
1. Vendors submit completed application and quote via email to DCWNEEDSFUND@thesenioralliance.org.

- 2. TSA will return application designated with Approval or Denial.
- 3. If approved, Vendor will purchase item/service and verify employee received item/service.

 To receive payment, Vendor will submit receipt for item purchased and invoice for payment via email to DCWNEEDSFUND@thesenioralliance.org.

All requests are subject to funding availability.

# Direct Care Worker Needs Fund

- An electronic copy of the application will be distributed to our current email contact list.
- You can also access the application on the "TSA Providers" section of our website.
- We encourage questions/inquiry at the same email address for application submission,

DCWNEEDSFUND@thesenioralliance.org.



# **Recipient Stories**

- <u>Request</u>: Brakes.
- <u>Reason</u>: Unable to continue to get to the homes of a couple participants safely.
- "I would like to extend a great big thank you for your help and getting my vehicle fixed. I needed new brakes and rotors and I truly appreciate the help extended to me so I don't have to worry about breaking down or sliding into someone. Again, thank you."

- <u>Request</u>: Gas card
- <u>Reason</u>: Recently took on more cases with increased driving through construction.
- "We greatly appreciate your support to our direct care worker during this time of need."



# FAQs

- Can a caregiver apply more than once for a gas card?
  - Contact <u>DCWNEEDSFUND@thesenioralliance.org</u> with reason why caregiver is requesting another gas card.
- Does the vendor have to buy the item first then be reimbursed?
  - Yes. The item or service will be approved, the vendor will purchase, provide proof of purchase, and then be reimbursed.
- What does hardship mean?
  - A hardship that impacts the employee effectively providing care to the TSA participant. (lack of transport, money for gas, needing childcare)



# Thank you!

• Any Questions??



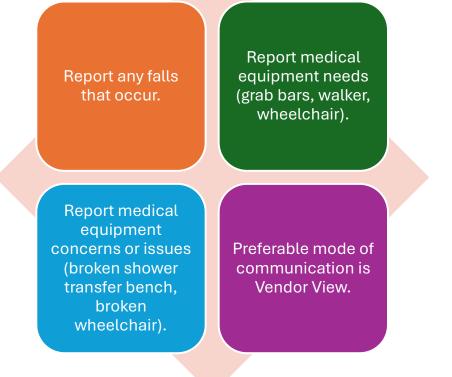


### Presented by the Fall Prevention Committee at The Senior Alliance

## Fall Prevention Tips for Caregivers

### Trip Hazards • Make sure there aren't any trip hazards (loose rugs, clutter). PERS unit • Make sure participants are wearing their emergency response button. Assistive Devices • Before leaving, ensure assistive devices are within reach (walker, cane, wheelchair). Phone • Make sure phone is within reach if emergency response button is not in place. **Emergency Contacts** • Be aware of emergency contacts for the participants.

### Things to report to Support Coordinator



## **Questions?**



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

## References

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

Acknowledgement of Attending The Senior Alliance Annual Provider Meeting and Training

#### April 29, 2025

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:

# Residential Services Training

## **Residential Service Code T2033 -Authorizations**

- All T2033 Residential Services authorizations have a daily or weekly task breakout written in the "Notes to Vendor" section in Vendor View
- Even though a vendor only has 1 unit per day authorized, it is expected vendors still report via Vendor View to TSA if they were not able to provide the full days worth of tasks reflected in the "notes to vendor" section of the service authorization.
- Vendor view messages need to state the number and type of tasks that were missed on each date of service.

Vendor:	0208 THE SENIOR ALLIANCE	Fund Source: 999 No Charge
Service:	T20335502 Residential Care/diem: No transport	SDL: 3053192
	Repeating Date-Anyt	ime Pattern
		ctly as Authorized
	1 unit(s) at \$25.00/unit 0	ccurs every Day
Starting:	07/22/2024	Total every day: 1 Unit(s), \$25.00
Notes to V	endor: 07/22/2024 2 units per day for am/pm care, 2 units per day for meal escor	rts, and 2 units 2x per week for bathing, escorts

## Residential Service Code T2033 – Premium Pay

- All direct care workers providing services under the T2033 code must receive the Direct Care Worker (DCW) Premium Pay as established by state regulations.
- The estimated DCW Premium Pay amount is included in the per diem rate authorized to the vendor.
- TSA is in process of adjusting per diem rates to include the FY 2025 premium pay increase and the minimum wage increase.

Formula:

(<mark>Per Diem Rate</mark> × <mark>Days Authorized in a <u>Week</u>)<u>÷</u>H2015 MI Choice Unit Rate</mark>=15-Minute Tasks Authorized per Week

Example Calculation:

- Per Diem Rate: \$20
- Days Authorized Weekly: 7 days
- H2015 MI Choice Unit Rate: \$5 (per 15-minute task)
- (<mark>20</mark>×<mark>7</mark>)÷<mark>5</mark>=28 15-Minute Tasks Authorized per Week

## Residential Service Code T2033 -Billing

- Vendors must bill the unit rate as authorized. Billing must be for 1 unit per day.
- The Senior Alliance will adjust the per diem unit rate paid in the event tasks are not provided as authorized.
- If Vendor has reported missed tasks through Vendor View, TSA will be adjusting the unit rate accordingly. This may occur after Vendor has billed the original authorized rate.
- The Vendor must keep a record of all tasks provided on each date of service billed.