

The Senior Alliance Annual Vendor Meeting and Training

April 7, 2026

The Senior
Alliance™

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

- ▶ Introduction - CEO and TSA Staff
- ▶ New and Upcoming Requirements
- ▶ Background Check Information
- ▶ OIG/Fraud, Waste, and Abuse
- ▶ General Vendor Requirements
- ▶ Community Care Requirements
- ▶ Assessment Information
- ▶ Fiscal Updates
- ▶ Direct Care Worker Fund
- ▶ Questions

INTRODUCTION/CONTACT INFORMATION

Jason Maciejewski	Chief Executive Officer
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
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INTRODUCTION/CONTACT INFORMATION

New and Upcoming Requirements

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Electronic Visit Verification (EVV)

- ▶ MDHHS required the use of 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.
- ▶ Currently, this does not apply to licensed settings, residential settings, nursing, and vendors working at residential settings.
- ▶ Vendors providing applicable services are required to use EVV, but billing is not yet linked to EVV.

EVV Live-In Caregiver Forms

- Use most updated form **BPHASA-2421 - [BPHASA-2421-LIVE-IN-CAREGIVER-FORM_8-2024.pdf](#)**
- Please use vendor view when submitting application **Attn: Renee Farrugia**
- Ensure that the correct program is checked and that the Medicaid ID number is correct
- Need 2 proofs of residency - examples on the next slide

LIVE-IN CAREGIVER ATTESTATION
Michigan Department of Health and Human Services

SECTION 1 – CAREGIVER INFORMATION

Purpose of Attestation (Check One): <input type="checkbox"/> Initial Request <input type="checkbox"/> Address Change <input type="checkbox"/> Renewal			
First Name		Last Name	
Street Address		City	State
Zip Code			
Email Address	Phone Number		CHAMPS Provider ID Number

SECTION 2 – BENEFICIARY INFORMATION

First Name		Last Name		Medicaid ID Number
Street Address		City	State	Zip Code
(Check One): <input type="checkbox"/> Behavioral Health <input type="checkbox"/> Home Help <input type="checkbox"/> MI Choice <input type="checkbox"/> MI Health Link				

EVV Live-In Caregiver Forms

- Use **two** of the following proofs of residency to verify the caregiver and beneficiary live at the same permanent, primary residence.
 - Valid Michigan driver's license
 - Valid Michigan state identification
 - Utility bill or credit card bill issued within the last 90 days
 - Account statement from a bank or other financial institution issued within the last 90 days
 - Mortgage, lease or rental agreement (Lease and rental agreements must include the landlord's telephone number)
 - Pay stub or earnings statement issued within the last 90 days
 - Life, health, auto, or home insurance policy
 - Michigan title and registration
 - Federal, state or local government documents, such as receipts, licenses or assessments
- Documents must include the live-in caregiver's name and current home address. Electronic copies are acceptable. For annual renewals if the caregiver and beneficiary reside in the same address, these proofs of residency are not required.

EVV Compliance

- ▶ If you are having any issues finding participants in the HHAX system, refer to our troubleshooting guide on TSA's website.
 - ▶ Make sure that the participant is in the MI Choice 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.

EVV Compliance Audit

- ▶ MDHHS has implemented a new policy that requires providers to meet an 85% compliance threshold. This means that providers must be at or above 85% accuracy for all EVV records with no manual edits.
- ▶ MDHHS considers a manual edit of an EVV record to be any time that a punch is missing and/or incorrect and is corrected by the vendor, or any time that visit information is missing from a record and is corrected by the vendor.
- ▶ TSA will be required to track this level of accuracy for all applicable providers. Corrective action, training, meetings with TSA and/or MDHHS, or other additional action may be required for those who do not meet the threshold.
- ▶ TSA is hoping to receive additional training on this requirement soon.

HHAX Trainings/ MDHHS Listserv Sign Up

- ▶ HHAX offers regular trainings for EVV use and compliance.
- ▶ HHAX training information can be found at:
 - ▶ <https://www.hhaexchange.com/info-hub/michigan-information-center>
- ▶ Vendors can also sign up for the MDHHS Listserv, which regularly sends out emails with training opportunities and other information from MDHHS.
- ▶ Listserv sign up is available at:
 - ▶ [Michigan Dept of Health & Human Services](#)

OIG Caregiver Termination Notification

- ▶ Vendors are now required by OIG to notify TSA when the Vendor has terminated a caregiver for cause.
- ▶ This would only apply to caregivers of TSA MI Choice participants who were terminated for a reason (e.g. suspected fraud, waste, or abuse).
- ▶ This does not apply to caregivers who have quit or are terminated for reasons such as lack of hours or not following Vendor internal policies.
- ▶ If Vendor has a termination that needs to be reported, the following should be sent to TSA with 10 days of the termination:
 - ▶ Name of terminated worker
 - ▶ Name of participant(s) that the caregiver provided services to
 - ▶ Date of termination
 - ▶ Short summary of actions taken by Vendor (timeline of events, written or verbal warnings, education to the worker, etc.)
 - ▶ General summary of violations committed by worker
 - ▶ Attach any relevant documentation if applicable (e.g. timesheets)

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.

Background Check Review

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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
- ▶ TSA can provide instructions on conducting any of the above background checks upon request.

Background Checks - Transportation Providers

- ▶ Transportation providers also need to conduct drivers' history checks for their drivers upon hire.
- ▶ 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)

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.

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.
- ▶ Any excludable convictions discovered for current caregivers serving TSA participants must be disclosed to TSA.
- ▶ TSA cannot reimburse 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.

Additional Background Check Requirements

- ▶ **Vendors are required to utilize ICHAT for background checks for any worker that serves TSA participants.** This can be in conjunction with another background check service, or the sole background check conducted by a vendor.
- ▶ TSA has found that background check companies often do not have search parameters that meet the needs of our programs. Mandatory exclusions can exist on a person's record as far back as 1996.
- ▶ Vendor must decide whether to prohibit individual from working with participants or accessing information based on background check results.
 - ▶ There are no exceptions for mandatory exclusions.
- ▶ 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.

Background Check Reviewing Tips

CRIMINAL TRACKING NUMBER: 338705030701
NAME USED: DOE, JOHN

INCIDENT DATE: 06/08/1987

ARREST SEGMENT : CHARGE SEGMENT : JUDICIAL SEGMENT

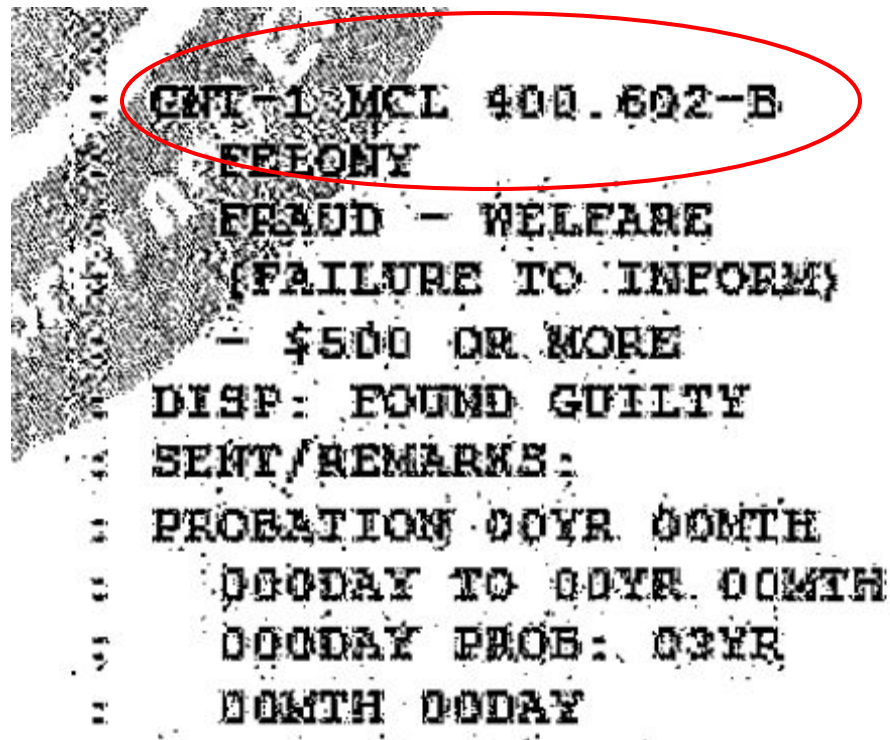
DATE: 06/08/1987 : MI330013A : DATE: 06/09/1987
MI3313300 : INGHAM COUNTY : MI330055J
INGHAM COUNTY SHERIFF : PROSECUTING ATT : 30TH CIRCUIT COURT
DEPARTMENT : 1 CNT MCL 750.110-A : CFN: 12345
OCA: 11223 : :
1 CNT OF 2200 : ENTERING - : CNT-1 MCL 750.110-A
BURGLARY : A BUILDING WITH : ATTEMPT-FELONY
DISP: CHGD BY PROSECUTOR : INTENT : BREAKING & ENTERING -
: : A BUILDING WITH
: INTENT
: DISP: FOUND GUILTY
: SENT/REMARKS:
: F/C/R-\$300 CONF-90D

CRIMINAL TRACKING NUMBER: 990199988801
NAME USED: DOE, HERMAN DAVID

INCIDENT DATE: 01/01/2001

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:



GWT-1 MCL 400.602-B
FELONY
FRAUD - WELFARE
(FAILURE TO INFORM)
- \$500 OR MORE
DISP: FOUND GUILTY
SENT/REMARKS:
PROBATION 00YR 00MTH
00DAY TO 00YR 00MTH
00DAY PROB: 03YR
00MTH 00DAY

Section 400.602

 [friendly link](#)

 [printer friendly](#)

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:

JUDICIAL SEGMENT

=====

DATE: 04/14/2000

MI580015J

38TH CIRCUIT COURT

CFN: 99-030273-FH

CNT-3 MCL 333.74012A4

ATTEMPT-FELONY


CONTROLLED


SUBSTANCE-DEL/MFG

(COCAINE, HEROIN OR
ANOTHER NARCOTIC)

LESS THAN 50 GRAMS

Section 333.7401

 [friendly link](#)

 [printer friendly](#)

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.
- ▶ Vendors must have updated TSA address on certificate. If the address is incorrect, it will be sent back to the vendor.
- ▶ **If updated insurance is not received by the expiration date, corrective action may be taken, including contract termination.**

RN Supervision

- ▶ If a 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.
- Supervisory Visits - RNs are required to perform supervisory visits for H2015 and T1019 services.
 - LPNs do not qualify under these standards.
 - LPNs should be supervised by RNs
- 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.
- First aid, blood borne pathogens, and universal precautions are also required for CLS and ADC services.
- CPR training may be required for workers that provide CLS, more information to come in the future.
- 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.

Fraud, Waste & Abuse

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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 Medicaid/OIG reporting:
 - ▶ Michigan Department of Health and Human Services (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

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 Compliance_Issues@thesenioralliance.org
- ▶ To report anonymously, mail concerns to:
 - ▶ The Senior Alliance
 - ▶ Attn: Compliance Officer
 - ▶ 3200 Greenfield, Ste. 100
 - ▶ Dearborn, MI 48120

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/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.

This includes:

- Assessment findings
- Billing when services were not provided for any reason, including missed visits, hospitalizations, nursing home admissions, participant not home, etc.

This shows the importance of ensuring that bills are only submitted when services were provided.

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)

Community Care Requirements

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Family Caregivers/Umbrella Workers

- ▶ Family members who provide home care services must meet the same standards as caregivers who are unrelated to the participant.
- ▶ This includes following internal background check requirements, normal training schedules, and all other hiring procedures.
- ▶ 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.
- ▶ Vendors should send a vendor view message once a family caregiver is hired to let the SC know the start date.

Nursing Notes

- ▶ 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.
- ▶ Please do not send nursing notes through email for security purposes.
- ▶ Nursing note questions:
 - ▶ Participant name
 - ▶ Summary of Participant's current health conditions
 - ▶ Changes in health from previous assessment
 - ▶ Tasks being performed are per physician's orders: Yes or No
 - ▶ Tasks performed are meeting participant's medical needs: Yes or No
 - ▶ Other comments
- ▶ These must be sent by the 5th of the month.
- ▶ 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.

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 and Status Change Reporting

- All critical incidents should be reported to Supports Coordinators within 2 days of the incident/knowledge of the incident.
- Reporting should include an initial phone call and a written, detailed report through vendor view. Any updates to the situation should also be reported.
- Critical incidents include 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.
- TSA expects that Vendor/Vendor staff will call APS, emergency services, and/or LARA depending on the situation.
- 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.

Communication

- Vendors are required to keep the lines of communication open and provide ongoing feedback on participants.
- This includes returning clearing out voicemail boxes and returning voicemails and/or vendor view messages within 24 hours.
- 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.
- Vendors should send vendor view messages about anything that includes Protected Health Information (PHI).
- Some examples of items to send through vendor view include:
 - 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
 - Falls/accidents/injuries
 - Decline or improvement in participant mental/physical condition
 - Significant change to informal supports of the participant

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
 - 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 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
 - Receive transportation to/from a participant’s house from family/friend

Assessment Information



Updated Fiscal/ Programmatic Assessments

- TSA will be sending vendors a list of documents that need to be pulled before the assessment and submitted electronically.
- Documents that 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 an 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.
- TSA may also conduct small sample assessments for new vendors or vendors not part of the normal assessment schedule.

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.
- ▶ If you have used the Vendor Audit Portal in the past, we are using a simplified version for now.
- ▶ 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 and upload a test document when you first receive your assessment notification. Do not wait until the last minute to access the portal.**
- ▶ If you are having issues accessing the portal, please let me know right away so we can troubleshoot any issues.
- ▶ TSA is unable to tell if there is an issue on the vendor end of the portal until you attempt to upload documents.

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.
 - 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.

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 on-site 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.**
- **If there has been a change in address, please let me know right away so TSA does not travel to an incorrect address.**
- 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 1/1/26

- ▶ Minimum Wage Increased to \$13.73.
- ▶ Previous rate was \$12.48 effective 2/21/2025 - 12/31/2025
- ▶ 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 or EVV log 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.
- Vendors must report to TSA if they believe any caregivers 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 Paper 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 9/30/26.
- ▶ The rate for workers remains at \$3.40/hour, and the admin rate is \$0.44/hour. The 15-minute 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 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. This must be a separate 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.

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.
 - ▶ 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.

Additional Billing Reminders

- ▶ Homemaking and Personal Care services should be tracked separately.
 - ▶ Example - 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/EVW 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 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 for the same month of service. If you receive late timesheets after your billing has been submitted, please submit the following month.
 - *Submitting multiple batches for the same month may result in delayed payment.*
- 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:
<https://thesenioralliance.org/providers/purchase-of-service-vendors/>
- ▶ Completed forms can be emailed to Contracts@thesenioralliance.org

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
Service: T2033--5502 Residential Care/diem: No transport

Fund Source: 999 No Charge
SDL: 3053192

Repeating Date-Anytime Pattern

----- **At Risk: Needs Services Exactly as Authorized** -----

1 unit(s) at \$25.00/unit Occurs every Day

Starting: 07/22/2024

Total every day: 1 Unit(s), \$25.00

Notes to Vendor: 07/22/2024 2 units per day for am/pm care, 2 units per day for meal escorts, 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.

Formula:

$(\text{Per Diem Rate} \times \text{Days Authorized in a Week}) \div \text{H2015 MI Choice Unit Rate} = \text{15-Minute Tasks Authorized per Week}$

Example Calculation:

- Per Diem Rate: \$20.08
- Days Authorized Weekly: 7 days
- H2015 MI Choice Unit Rate: \$6.11 (per 15-minute task)

$(20.08 \times 7) \div 6.11 = 23 \text{ 15-Minute Tasks Authorized per Week}$

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.

TSA Website

<https://thesenioralliance.org/>

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

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

You can also find:

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

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
- ACLS - Bureau of Aging, Community Living, and Supports
- 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?



DCW Needs Fund

THANK YOU!!

Meijer Gift Cards = 105 DCWs

A Heart That Cares
Divined Company
Family Friends
Stay at Home
Heart 2 Heart
Excellacare
Loving Care Services
LaJoy Fi
Homestead
Addus
Loving Care Home Care
Fonag



Tires = 22 sets

Divined Company
A Heart That Cares
Stay At Home
Heart 2 Heart
A Heart That Cares
Excellacare
Addus
Loving Care Home Care

- ❖ 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 DCWs experiencing hardship which creates a barrier to their valuable service.
- ❖ A limited amount of funds has been designated for this program and all requests submitted are subject to funding availability.

Participating Vendors

Elsmar
Divined Company
Personal Touch Home Health Care Services
Stay at Home
LaJoy Fi
Homestead Home Health Care
Angel Home Care

Examples

- ✓ Front suspension overhaul
- ✓ Brakes
- ✓ Car battery
- ✓ Fuel Pump
- ✓ Oil Change
- ✓ DTE bill
- ✓ Childcare
- ✓ Rent

What does hardship mean?

A hardship that impacts the employee effectively providing care to the TSA participant (i.e. lack of transport, money for gas, needing childcare).

What if the caregiver does not have time to complete this process due to the urgency of the need?

The grant may still be able to assist. How did they pay for the service? Is there another need now?

Example: A car needs to be towed and repaired. The caregiver uses the money set aside for their DTE bill for the tow and repair. In the application, note the car repair being an unexpected expense. Include information (i.e. a receipt) noting assistance is now needed for the DTE bill because that money was used for the car repair. Provide a picture or screenshot of the DTE bill.

(Please note, TSA is unable to reimburse purchases made prior to approval.)

Who pays and when?

- **The DCW completes the application and includes an estimate**
(please note, the estimate must be from a business)
- **The Vendor emails the application and estimate to DCWNEEDSFUND@thesenioralliance.org**
- **TSA will approve, deny or request more information**
- **If approved, vendor will make purchase directly from the business**
(Please note, TSA cannot reimburse for a purchase made by the caregiver. The purchase must be completed by the Vendor.)
- **The vendor provides the receipt to the email above**
- **TSA reimburses the vendor**

Can a caregiver apply more than once?

We want to help as many DCWs as possible. Therefore, we will normally limit assistance to once a year. If there are special circumstances, please contact DCWNEEDSFUND@thesenioralliance.org explaining the situation and why an exception should be made.

Brakes

“...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. I don't have to worry about breaking down or sliding into someone. Again, thank you.”

Gas Card

“...My car went down and financially, I am not able to get another car right now. It is very hard for me to get back and forth to all of my clients because I have to get rides, borrow my dad's car or my friend's car. The gas cards are a big relief because they help me save a little towards another car! I love my clients and I love what I do! I am glad that I am able to keep helping them with the help of the gas cards. Thank you!”

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

References

- ▶ <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

April 7, 2026

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: _____