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## **FOLLOW UP INFORMATION RE: CCM Member and CCM Family Quarterly Calls: August 6<sup>th</sup> and 15<sup>th</sup>, 2024**

### AGENDA

<b>Topic</b>	<b>Time</b>
Updates on all CSN Service Delivery Enhancements	8/6 – 12 – 12:30 p.m. 8/15 – 5:00 – 5:30 p.m.
Feedback from CCM Members and CCM Families	8/6 – 12:30 – 1:30 p.m. 8/15 – 5:30 – 6:30 p.m.

### CCM Member and CCM Family Feedback and Follow-up

1. **OLTSS asked CCM members and families if it would it be helpful for nurses to be able to indicate on their CCM Nurse Directory profiles that they are willing to work “per diem” shifts, rather than regularly scheduled shifts (such as every week).**
  - a. **CCM Member and Family Responses:**
    - i. Families shared that any information that can be added to the directory is helpful, and therefore it would be helpful to add “per diem” as an option for nursing shifts.
    - ii. Another family shared that some families may not wish to work with “per diem” nurses due to the time needed to orient and train a new nurse to a member’s case; however, this is a family by family preference
    - iii. CCM families asked how per diem coverage would be represented in prior authorizations?
      1. **OLTSS Response:** CCM would work with the nurse and family to figure out how to best add hours to a prior authorization, and prior authorizations could be adjusted to account for possible changes that come up over time.
    - iv. CCM families asked if per diem nurses would be eligible for training time reimbursement?
      1. **OLTSS Response:** Yes, per diem nurses would be eligible to bill for the 8 hours of training time when first starting to work with a new member.
2. **OLTSS asked CCM members and families for feedback on communication efforts**
  - a. **CCM Member and Family Responses:**
    - i. CCM family inquired about receiving both emails and text messages and how to choose just one communication option
      1. **OLTSS Response:** CCM members and families must sign up in order to receive text messages alerts. If a member or family would like to stop receiving text message alerts, please let your CCM clinical manager know. There is not currently a way to opt-out of email updates from OLTSS/CCM. OLTSS does not recommend that families

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replace emails with text messages as more information is shared via email and important communication may be missed.

### 3. CCM families asked questions and provided feedback about August 1<sup>st</sup>. 2024 CSN rate increases

- a. CCM families expressed concern that agencies are offering different pay rates to their nurses following the CSN rate increases and asked if MassHealth is monitoring what agencies are doing relative to the rate increases.
  - i. **OLTSS Response:** MassHealth has been encouraging agencies to communicate rate increases directly to nurses as the intent of the rate increase was to help address workforce challenges. MassHealth also recently added annual staffing report requirements for CSN agencies, which includes reporting on agency nurse gross wage data. Agencies are required to submit this new report to MassHealth every year. MassHealth is limited in terms of how we can require agencies to use our rates because MassHealth does not have a wage passthrough for CSN services; however, MassHealth has also communicated to agencies several times that these rate increases are intended to support higher wages for nurses.
- b. CCM families asked for MassHealth to consider a wage-pass through in future rates.
  - i. **OLTSS Response:** MassHealth will discuss this internally.
- c. CCM families asked if MassHealth is including agencies in conversations about definitions of high acuity, for consideration in the future of a possible enhanced rate for high-acuity members?
  - i. **OLTSS Response:** The staffing reports that MassHealth will be collecting from CSN agencies include questions regarding if and how agencies apply high acuity increases for member cases.
- d. CCM families asked MassHealth to reconsider a high acuity rate.
  - i. **OLTSS Response:** Based on concerns raised at the public hearing, the updated CSN rate regulation does not include the originally proposed CSN High-Tech Rate Add-On. MassHealth was in particular concerned that the addition of the high-tech rate as originally proposed could lead to nurses leaving some member cases in pursuit of others, causing nurse shifting withing the CCM population.

MassHealth did explore creating a high-acuity rate enhancement; however, consensus could not be reached on clear criteria for a high-acuity rate add-on. Additionally, a 2<sup>nd</sup> public hearing would be required to receive public comment about a high-acuity rate add-on. To avoid delaying the rate increase for all RNs and LPNs, MassHealth moved forward to finalize the parts of the regulation that received significant support.

MassHealth may consider adding a high-acuity or other type of enhanced rate at a later time, with input from stakeholders including CCM members and families.

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- e. CCM families asked about whether there are differences in reimbursement rates between independent nurse and agencies.
    - i. **OLTSS Response:** Agency reimbursement rates are set higher than reimbursement rates for independent nurses to account for agency overhead costs; independent nurse reimbursement rates also take into account administrative costs that independent nurses incur.
- 4. CCM families asked questions about the CSN Agency Annual Staffing Report Requirements**
- a. CCM families asked if MassHealth looks at agency overhead costs relative to nurse wages.
    - i. **OLTSS Response:** CSN agencies are required to submit annual cost reports to MassHealth with an explanation of overhead costs.
  - b. CCM families asked if agency staffing and wage reports will track number of nurses employed by an agency at the beginning of the year and end of the year
    - i. **OLTSS Response:** We have been collecting agency recruitment and retention data for the past year and will continue to do so
- 5. CCM families asked questions about CSN training and documentation time**
- a. Families asked whether the reimbursement rate for training time is the same as standard CSN reimbursement rates?
    - i. **OLTSS Response:** Currently, MassHealth is able to reimburse for CSN training time to match our CSN rates for daytime, weekend, and holiday rates. Unfortunately, MassHealth has recently discovered that our billing system is incompatible to be able to pay for CSN training time at the CSN nighttime rate of reimbursement. MassHealth will be working to resolve this issue once system updates have been made to allow it; in the meantime, CSN agencies and independent nurses are not able to be reimbursed at the same nighttime rate for CSN training time that takes place between 3pm and 7am.
  - b. Families asked whether the eight hours of training time have to be spread across all nurses working with a member?
    - i. **OLTSS Response:** CSN Training time hours are nurse specific and member specific. When a new nurse begins working with a member for the first time, MassHealth will reimburse for up to 8 hours of CSN training time for that nurse. If there are multiple nurses working with a member for the first time, each nurse is eligible to bill for up to 8 hours of training time. If a nurse begins working with more than one member for the first time, that nurse will be eligible to bill for 8 hours of training time for each new member with whom they are working.
- 6. CCM families asked questions about billing and policies for Independent Nurses**
- a. CCM families asked about independent nurses who have shared with families concerns about CSN claims suspending in the last two weeks.
    - i. **OLTSS Response:** MassHealth has put in recent claims detections for INs. The claims detections are not new billing requirements; the detections

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ensure that INs are complying with current regulations. Communications have been sent out to INs over the past few weeks letting them know that if any of their claims are at odds with claims detections, they will be suspended for manual review. After each claim is reviewed it will be set to pay or deny. If claims deny, nurses will have the opportunity to resubmit their claims.

- b. CCM families asked about streamlining record keeping for Independent Nurses.
  - i. **OLTSS Response:** MassHealth does not currently have an electronic record keeping system for independent nurses. MassHealth can continue to discuss this; however, implementing an electronic record system for CSN providers would require significant funding.
    - CCM families asked about other ways to address IN recordkeeping, such as requiring parent signatures on notes, making copy of notes available to families, or requiring time-sheets?
      - a. **OLTSS Response:** MassHealth did a documentation training for IN's this past Spring reviewing documentation requirements for INs and templates that MassHealth has created, including templates for creating a plan of care and nursing progress notes. MassHealth has considered the idea of requiring time sheets for INs; however, we have received mixed feedback from families on whether this would be helpful or more burdensome for families. Based on this feedback, MassHealth has not pursued requiring timesheets for IN providers. MassHealth regulations do require that all providers, including agencies and INs, maintain a copy of the member's medical records in the member's home at all times, which includes shift notes. MassHealth stresses this requirement during all of our trainings with IN providers.
- c. CCM families asked if MassHealth is the employer of Independent Nurses
  - i. **OLTSS Response:** MassHealth does not employ Independent Nurses, they work as independent contractors.

## 7. CCM families asked questions about the Complex Care Assistant (CCA) program

- a. CCM families asked about being compensated for greater than 40 hours of CCA services in a week, when their agency employer will only schedule the family member for 40 hours.
  - i. **OLTSS Response:** MassHealth does not currently have an overtime reimbursement rate established for CCA services, which may be why an agency will not schedule a CCA to work more than 40 hours in a week. CCM Members may have more than one CCA provide services, which is a way that those additional hours could be used. CCAs can also be employed by more than one agency and can split hours between agencies if preferred. The [CCM member web page on mass.gov](#) contains a list of agencies providing

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CCA services and CCM Clinical Managers can also talk to families about agencies providing CCA services in their area.

- b. CCM families asked if agencies are allowed to decline employing a family member as a CCA unless the family receives CSN services through the same agency.
    - i. **OLTSS Response:** This is ultimately each agency's decision. MassHealth allows for a CSN nurse working with a family to provide supervision to the CCA, which makes staffing CCA cases easier for agencies. If there is not already a CSN nurse working with a family, some agencies may not have additional nursing staff to provide supervision to the CCA. If a family has experienced this with an agency, MassHealth recommends families connect with their CCM Clinical Managers to talk about different options, such as other agencies or other services.
  - c. CCM families asked if MassHealth will provide increases to CCA reimbursement rates in the future?
    - i. **OLTSS Response:** MassHealth conducts a rate review for CSN agency and independent nursing rates every two years, which includes a review of CSN rates and CCA rates.
- 8. CCM families asked questions about the CCM Nurse Directory**
- a. CCM families asked if there is a place to note changes to position availability on nurse directory profiles
    - i. **OLTSS Response:** Profiles in the nurse directory can be marked as active or inactive; so if a family is no longer looking for nursing hours, they can mark their profile as inactive. If the family would like to look for nursing hours again, their profile can be re-activated and information can be updated. CCM can assist members/families with this process if needed.
- 9. CCM families asked questions about employee benefits and policies for family members working as complex care assistants.**
- a. **OLTSS Response:** For questions about employee benefits and company policies, MassHealth recommends that complex care assistants speak with their agency employer.