



Complex Care Assistant Services CCM Members and Families Information Session

July 2023

Agenda

1. What are Complex Care Assistant Services
2. What Tasks Can a Complex Care Assistant Do?
3. What Are Enhanced Care Services?
4. How Do I Become a Complex Care Assistant?
5. FAQs About Becoming a Complex Care Assistant
6. Training & Competency Requirements
7. Supervision & Evaluation Requirements
8. Authorization of Complex Care Assistant Services
9. Adjusting Hours for Complex Care Assistant Services
10. Steps for Adjusting Hours for Complex Care Assistant Services
11. FAQs About the Authorization of Complex Care Assistant Services
12. Complex Care Assistant Services Reimbursement
13. FAQs about Reimbursement for Complex Care Assistant Services
14. Complex Care Assistant Services: Next Steps

What are Complex Care Assistant Services?

MassHealth is promulgating amendments to [130 CMR 438.000](#) to add a new service, **Complex Care Assistant (CCA) services**.

Regulations will be effective July 21st

This new service type:

- Provides an additional avenue of support for CCM members.
- Provides a pathway to pay family caregivers for some elements of specialized care to medically complex MassHealth members.
- Complements CSN services and provides an additional care option.

This new service type does not:

- Replace continuous skilled nursing (CSN) services.

Similar models have been launched in CO & AZ, and are being considered in NH, TX, & FL

What are Complex Care Assistant Services?

Who can have complex care assistant services?

- MassHealth members who meet the medical necessity requirements for CSN services.

Who can provide complex care assistant services?

- MassHealth-enrolled CSN agencies
 - Home health agencies may not provide this service
- Complex care assistants are either employed or contracted by the CSN agency to provide the service
- Complex care assistants can be:
 - **Family members**, including parents, spouses, and legal guardians.
 - **Nonfamily members**, including friends, neighbors, or individuals not connected to the CCM member

What Tasks Can a Complex Care Assistant Perform?

- **Personal Care Services:** Includes all the same tasks that a home health aide can perform.

Activities of Daily Living (ADLs): activities related to personal care, specifically bathing, grooming, dressing, toileting/continence, transferring/ambulation, and eating.

Incidental Services: Additional services that may be needed when ADLs are performed (for example, light cleaning, preparing a meal, removing trash).

- **Enhanced Care Services:** Additional tasks that a CCA can perform that do not require the skills, judgement, or assessment of a nurse.

What are Enhanced Care Services?

1. **Enteral G-tube/J-tube feedings** – includes pump set up/discontinuation and/or administering bolus feeds; does not include changing or replacing of equipment.
2. **Skin care including application of OTC products or routine G-tube/J-tube care** – application of non-medicated over-the-counter products or routine G-tube/J-tube care, or stomas requiring care, or simple dressing changes that do not require application of medications, medicated, or specialized dressing products.
3. **Oxygen therapy** – provides assistance to replace oxygen tubing or nasal cannula and set oxygen at ordered flow rate so long as the care is not in response to a respiratory event requiring the judgement and assessment of a nurse.
4. **Oral (dental) suction to remove superficial oral secretions** – provides suctioning of superficial secretions in the oral cavity, includes set up and cleaning of suction device.
5. **Ostomy and catheter care** – empties/changes ostomy bag or urinary collection devices and cleans skin where there is no need for skilled skin care, recording, observation or reporting required. Does not include the replacement of catheters.
6. **Modified meal preparation** – prepares diets that do not require nurse oversight to administer. This may include modification of meal consistency as directed.
7. **Equipment management and maintenance** – (wheelchair, CPAP/BiPAP, oxygen and Respiratory care equipment), such as simple cleaning, and monitoring for and reporting any equipment issues to RN supervisor and CSN agency, including associated agency paperwork.
8. **Application and removal of braces, splints, and/or pressure stockings.**
9. **Transportation to medical providers / pharmacy** - by driving the member or going alone.

How Do I Become a Complex Care Assistant?

Step One: Let your CCM clinical manager know that you are interested in complex care assistant services.

Step Two: Identify a CSN Agency who will be providing complex care assistant services in your geographic area.

- As of today, the following agencies have confirmed they will be providing CCA services:

| Confirmed CSN Agency | Home Health Agencies enrolling as CSN agencies |
|-------------------------------|--|
| Open Door Healthcare Services | Cultured Care |
| Fortcom Health | Radiance Home Health |
| Tak Progressive | Seraphic Springs Health Care |
| Solace Healthcare Solutions | Maxim Healthcare |
| M&L Prodigy Healthcare Inc. | KAF Home Healthcare |
| Bayada | Northeast Arc |
| Marathon Nursing Services | Maestro-Connections Health Systems |
| Greater Horizon Healthcare | |

- MassHealth will update this list regularly. The list will be posted on the CCM webpage at mass.gov/ccm and will be shared with CCM clinical managers.

How Do I Become a Complex Care Assistant?

Step Three: Complete hiring/onboarding process as well as training and or competency requirements for your CSN Agency.

- MassHealth has established competency training and comprehension requirements for complex care assistant services in our regulations at 130 CMR 438.000 and in a forthcoming CSN Agency bulletin.
- Hiring and onboarding may be different for each agency, based on their agency policies.

Step Four: CCM will complete the assessment for complex care assistant services.

- The CCA assessment will involve review of new or existing assessments (CSN, HHA, PCA) to identify qualifying CCA tasks
- CCM will also modify existing prior authorizations to remove duplication of services, as applicable

Step Five: CCM will issue the prior authorization for complex care assistant services to your CSN agency.

FAQs About Becoming a Complex Care Assistant

1. Can a parent assume multiple roles at the same time, such as a combination of CCA and PCA?

A parent can serve as multiple provider types (such as complex care assistant and independent nurse); however, they cannot provide both services at the same time.

2. Can parents who are currently serving as home health aides switch to complex care assistant?

Families who are serving as home health aides may switch to complex care assistants once the regulations are promulgated so long as they have completed the complex care assistant assessment, they have been hired by a CSN agency, they have completed the competency training and comprehension requirements, and CCM has issued a prior authorization.

Training & Competency Requirements

In order to provide CCA services, an individual must complete a **competency training and comprehension program**. The Complex Care Assistant competency training and comprehension program may be provided by a CSN agency or other organization that meets MassHealth requirements.

1. Personal Care Services, Training and Competency Requirements

- a) The Assistant must meet the training and competency evaluation program standards for home health aides, established at [42 CFR 484.80](#). This includes:
 - 1. Completing a training and competency evaluation (75-hour training); or
 - 2. Completing a competency evaluation; or
 - 3. Being a CNA

2. Enhanced Care Services, Training and Competency Requirements

- a) The assistant must demonstrate proficiency in safely providing the enhanced care services specific to the complex care member's needs. An assistant may meet the competency training and comprehension requirements for enhanced care services by:
 - 1. Completing at least 10 hours of direct training on the enhanced care services specific to the member they will serve and proficiency in each care task has been evaluated and documented; or
 - 2. Completing an evaluation that demonstrates and documents the assistant's proficiency in the enhanced care services specific to the member they will serve

Competency Training & Comprehension Documentation

Training organizations for CCA services are responsible for creating a certificate of completion for complex care assistants. The certificate must include:

1. The name of the individual certified;
2. The name of the training organization;
3. A statement that the individual completed a home health aide training and competency evaluation program or a competency evaluation program that meets the standards set forth at 42 CFR 484.80 and 130 CMR 438 (C)(3);
4. a statement that the individual has met the competency training and comprehension program requirements for complex care assistant enhanced care services that meets the standards set forth at 130 CMR 438.415(C)(3);
5. the date of completion; and,
6. the signature of the organization's clinical supervisor or director.

Supervision and Evaluation Requirements

Complex Care Assistant Supervision Requirements

- RN supervisor must make an **onsite visit** to the member's home **no less frequently than every 14 days** to assess the quality and safety of the CCA services provided.
 - Agencies may use telehealth for one supervisory visit in a 60-day period
- RN supervisor must make an **onsite visit** to the member's home *while the assistant is providing services* **once every 60 days**.

Complex Care Assistant Evaluation Requirements

- A 12-month enhanced care evaluation must be conducted by a RN.
- The evaluation must review the member-specific enhanced care tasks the assistant performs according to the member's care instructions.
- The complex care assistant's proficiency must be evaluated and new training provided as necessary.

FAQs about Training, Competency and Supervision

1. Can training requirements be fulfilled online or remotely?

MassHealth regulations do not prohibit the use of online or remote training for complex care assistant services, so long as the CSN Agency or training organization meets the requirements established in our regulations and sub regulatory guidance for the competency training and comprehension requirements.

2. Can a non-family member complete the competency evaluation in lieu of training to become a complex care assistant (such as CNAs, EMTs)?

Yes. Non Family members may also complete the competency evaluation in lieu of training; however, this is ultimately up to the CSN agency employing the complex care assistant.

3. Can supervisory visits be performed by agency nurses already working in the home, or must it be a separate nurse supervisor?

Yes. If a member is receiving CSN services from a RN from the same CSN agency providing CCA services, their CSN nurse may serve as the RN supervisor. This would not require additional visits from the CSN nurse. Multiple CSN agency nurses may provide 'supervision,' so long as they are RNs and are from the same agency as the CCA.

Authorization of Complex Care Assistant Services

CCM will be conducting the assessment for complex care assistant services and will be creating the prior authorization. The assessment will consider:

- **Personal Care Tasks and Enhanced Care Tasks**
 - CCM is creating a tool, based off assessments for CSN, home health aide, and PCA.
- **Other Services the Member is Receiving (ie: home health aide, PCA, CSN)**
 - Given that several CCA tasks may overlap with other services, CCM will work with members to identify which qualifying services they would like to have performed by which role and to ensure there is no duplication of services.

CCM anticipates they will be able to start assessments for complex care assistant services by mid August.

Authorization of Complex Care Assistant Services

The assessment will be based on the current home health aide assessment, adding in enhanced care services. During the assessment, CCM will **identify all medically necessary care tasks** that could be included on the complex care assistant authorization.

CCM will then go over with the family if any care tasks **overlap with over services the member is receiving**, such as PCA or CSN. For example:

- Both a **CCA and a PCA** can perform **activities of daily living** and **transportation**
- Both a **CCA and a CSN nurse** can provide support with **G/J tube feedings**

Members and families will then decide where they would like any overlapping services to sit. For example:

- A family could decide to keep time for bathing on their PCA authorization, while moving support with eating to their CCA authorization.
- A family could decide to keep Ostomy and catheter care on their CSN authorization, while moving g-tube feedings to their CCA authorization.

Adjusting Hours for Complex Care Assistant Services

A member or family could choose to adjust their hours between CSN, PCA and CCA services due to:

- A nurse being unavailable due to vacation, illness, or leaving the workforce
- A nurse becoming available to fill more CSN hours
- Family preference

If a member or family chooses to adjust their hours, CCM will adjust the member's PA to reflect this change.

- This adjustment will take some time to implement.
- Requires adjustments to the PA and the assessments for CSN and CCA services.
- For CCA and CSN services, this adjustment can be retroactive to the date of the actual change, to ensure no gaps in billing/care.
- For PCA services, adjustments over 14 hours require an MD's signature; PCA adjustments to PAs cannot be dated retroactively.

Please note, CSN services are not 1:1 with CCA services.

- CCA's may not provide tasks that require the skills of a nurse.
- Likewise, nurses may not be reimbursed for personal care tasks.

Steps for Adjusting Hours for Complex Care Assistant Services

The process for adjusting a prior authorization involves collaboration between the member/family, their CSN agency providing CCA services, and CCM, and other service entities as appropriate.

Step 1. If a family would like to move hours from CCA to another service or vice versa, they should first connect with their CSN agency to discuss the desired change.

Step 2. The family and the agency should reach out to CCM to request an adjustment be made to the associated prior authorizations.

Step 3. CCM will review the request and ensure that:

- The care tasks that are being moved to another authorization are applicable to that service type
 - For example: , PCAs are authorized to administer medication at the direction of the member/member's surrogate while complex care assistants are not
- The member remains eligible for each service type
 - For example, in order to be eligible for PCA services, the PCA authorization must include at least two activities of daily living.

Step 4. CCM will adjust the appropriate prior authorizations and assessments for whichever services are impacted.

- Adjusting the prior authorization may take up to 14 days; however, the adjusted prior authorizations for CCA and CSN can be dated retroactively to account for the time when the change took place.

FAQs about the Authorization of Complex Care Assistant Services

1. Will adding complex care assistant services decrease my CSN nursing hours?

Adding complex care assistant services may decrease your CSN nursing authorization if the family elects to move services from their CSN authorization to their CCA authorization. If a family does not want to move any services from their CSN authorization to their CCA authorization, their CSN authorization will not be decreased by adding CCA services.

2. How long will the assessment and authorization process take?

Aligning with MassHealth regulations, CCM may take up to 14 days to complete the prior authorization, so long as there is an identified CSN agency and complex care assistant to provide the services. We anticipate it taking closer to 14 days initially, as this program rolls out; however, once this program is fully operationalized and not all assessments are taking place at the same time, we anticipate the time between evaluation and prior authorization to take less time.

3. Can adjustments to CCA authorizations only be made during the annual assessment?

No. CCM members and families can request changes to their CCA authorization at any time; they do not have to wait until their annual assessment.

4. Can I have CCA services and maintain my PCA services?

Yes. A member could have both CCA services and PCA services, so long as there is no duplication of services, and they retain at least two ADLs on their PCA authorization.

5. Can unused CCA hours be used throughout the PA period?

No. Only unused CSN services may be used throughout the PA period.

Complex Care Assistant Services Reimbursement

MassHealth will reimburse CSN agencies for CCA services at **\$11.25/15-minute unit**.

- MassHealth is requiring a **wage passthrough of 65%**.
 - This requires that CSN agencies pay a **gross wage of ~\$29.25/hour**.
 - If there are **employee contributions**, including but not limited to employee responsible taxes, employee contributions to fringe benefits, and optional employee benefits (i.e. 401K, short term disability), these **would come out of the 65% wage passthrough**.
- The **remaining 35% of the reimbursement rate** to CSN agencies is for overhead costs.
 - **This includes state mandated employee benefits**, like PTO and basic healthcare coverage.
 - **This includes employer responsible taxes**, such as payroll taxes.

FAQs about Reimbursement for Complex Care Assistant Services

1. Will all agencies pay the same salary for complex care assistant services?

The 65% wage passthrough sets a gross wage minimum they are required to pay. Agencies may choose to pay above that gross wage.

2. Will CCAs be paid for documentation time and or for training time?

MassHealth reimbursement is for hours of complex care assistant services delivered. It is up to each CSN agency whether they will pay CCAs for time spent in training/for documentation that takes place outside of their authorized hours.

3. Will CCAs receive overtime pay?

MassHealth does not have an overtime rate established for CCA services. Ultimately, it will be up to agencies to decide how to address overtime, abiding by state and federal regulations.

4. Are wages for complex care assistants federally tax exempt?

Complex care assistant services are not federally tax exempt.

5. Can agencies bill travel time for CCA supervisory visits?

MassHealth does not authorize time specifically for travel time to and from a member's home; however, MassHealth does reimburse for the complex care assistant 60-day supervisory visit.

Complex Care Assistant Services: Next Steps

The regulation amendments establishing complex care assistant services at 130 CMR 438.000 are anticipated to **go into effect on July 21st**.

As of July 21st, CCM members and families who are **interested in complex care assistant services** may:

- **Identify a CSN agency** who will be providing CCA services
- Begin the **hiring** process and complete the **competency training and comprehension requirements**

CCM is developing the **CCA assessment tool** and will **begin assessments in mid August**.

- CCM will send an email to all members and families once the assessment is officially available
- In the meantime, **you can let your CCM clinical manager know** that you are interested in CCA services

MassHealth is developing a **Frequently Asked Questions (FAQ) document** about complex care assistant services. The FAQ document will be posted on the **CCM webpage at mass.gov/ccm** and will be updated regularly overtime.

MassHealth is hosting a **second information session** with CCM members and families on Wednesday, July 26th from 5:30 – 7pm.