



Complex Care Assistant Services Provider Information Session

June 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. Training & Competency Requirements
5. Competency Training & Comprehension Documentation
6. Supervision & Evaluation Requirements
7. Authorization of Complex Care Assistant Services
8. Complex Care Assistant Services Reimbursement
9. Complex Care Assistant Services: Next Steps
10. Frequently Asked Questions

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**.

Target promulgation July 21, 2023

This new service type does:

- Provide an additional avenue of support for CCM members.
- Provide a pathway to pay family caregivers for specialized care to medically complex MassHealth members.
- Complement CSN services and provide 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 and who proactively elect to participate in the CCA program.

Who can provide complex care assistant services?

- MassHealth-enrolled CSN agencies
 - Home health agencies may not provide this service
 - If you are a home health agency and would like to provide CCA services, please contact the LTSS Service Center to enroll as a CSN agency
- 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; or
 - **Nonfamily members**, including friends, neighbors, or individuals not connected to the CCM member.

What Tasks Can a Complex Care Assistant Do?

- **Personal Care Services:** Includes all the same tasks that a home health aide can do.
- **Enhanced Care Services:** Additional tasks that a CCA can perform that do not require the skills, judgement, or assessment of a nurse, consistent with the Nurse Practice Act.

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, reporting, and paperwork application and removal of braces, splints, and/or pressure stockings
8. **Transportation to medical providers / pharmacy** - by driving the member or going alone

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 any organization, including a CSN agency, that meets the requirements outlined in a forthcoming **CSN Agency Bulletin**.

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

A [RN](#) must conduct the training and or competency evaluation for complex care assistants.

Competency Training & Comprehension Documentation

CSN Agencies providing CCA services are responsible for maintaining a sufficient record in the CCA's employee file showing that the assistant has successfully:

- Completed training on personal care services and enhanced care services and has been evaluated to safely perform the care; **OR**
- The assistant's proficiency in performing personal care services and enhanced care services has been evaluated to and shows that they can safely perform the care.

Documentation must include a certificate of completion from the training organization. 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.
 - Supervisory visit may be made by using two-way audio-video telecommunications technology that allows for real-time interaction between the RN and the patient, and representative as needed, **no more than once per patient in a 60-day certification 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.

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**
- **Other Services the Member is Receiving (i.e: home health aide, PCA, CSN)**
 - Given that several CCA tasks may overlap with other services, CCM will work with members to identify which services they would like to have performed by which role to ensure compliance with federal rules that require no duplication of services.

CCM anticipates starting assessments in August.

Authorization of Complex Care Assistant Services

A member or family could choose to adjust their hours between CSN 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.

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

- CCA's must comply with the Nurse Practice Act and may not provide tasks that require the skills of a nurse.
- Likewise, nurses may not be reimbursed for personal care tasks.

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%**.
 - At least 65% of all reimbursement funds must go to the complex care assistant for services provided.
 - This comes out to a gross wage of ~\$29.25/hour.
- 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 does not necessarily include** optional employee benefits such as short-term disability, additional tax withholdings, etc.

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.

**Please note: The CSN rate regulations at 101 CMR 361.00 will be effective for dates of service on or after July 1st. Agencies should continue to bill MassHealth in the same manner. Agencies will continue to be compensated at the current rate. There is NO CHANGE.

In the meantime, MassHealth is requesting agencies to:

1. **Let MassHealth know** if you will be providing complex care assistant services by **7/10**.
2. **Refrain from hiring** for the complex care assistant role until the regulations are effective.
3. **Do not outreach** to CCM members or families **who are not served by your agency** about complex care assistant services until after the regulations are effective.
4. **Refer any families** who reach out with **questions to MassHealth** (anne.Kazarnovsky@mass.gov)

MassHealth will be **communicating directly with families** about complex care assistant services.

1. MassHealth will be emailing CCM member and families today with an update and **sharing this slide presentation**.
2. MassHealth is hosting an **information session** with CCM families on July 13th.
3. MassHealth is developing an **FAQ specifically for CCM families**.

Frequently Asked Questions

- 1. Can a CCM member utilize complex care assistant services if their CSN hours are covered by commercial insurance?**
 - Yes. All CCM members are eligible for complex care assistant services so long as there is no duplication of services.
- 2. How do we document the hours a parent is working with a member, distinguishing between complex care assistant tasks and parent tasks?**
 - Documentation should only reflect complex care assistant tasks. It is up to each individual agency to determine how best to document and establish a plan of care for complex care assistant services.
- 3. Can the 14-day supervision be provided virtually?**
 - The 14-day supervisory visit may be made by using two-way audio-video telecommunications technology that allows for real-time interaction between the RN and the patient, and representative as needed, no more than once per patient in a 60-day certification period.

Frequently Asked Questions

4. Can any portion of the training be completed in a simulation lab?

- The location of complex care assistant training is up to the discretion of the CSN agency or training organization, so long as the training is direct, member specific and meets the requirements at 130 CMR 438.000 and forthcoming CSN Agency Provider Bulletin.

5. Will complex care assistants be able to work overtime?

- MassHealth does not have an overtime rate established for complex care assistant services.