



**MassHealth**  
**Continuous Skilled Nursing Agency**  
**Bulletin 7**  
**July 2022**

**TO:** Continuous Skilled Nursing Agencies Participating in MassHealth

**FROM:** Amanda Cassel Kraft, Assistant Secretary for MassHealth

**RE:** Updates to CSN Overtime Policy effective July 1, 2022

### **Introduction**

In March 2022, the Executive Office of Health and Human Services (EOHHS) issued [Continuous Skilled Nursing \(CSN\) Agency Bulletin 3](#) that temporarily permits CSN Agencies and home health agencies providing CSN services to bill MassHealth at the CSN overtime (OT) rates established in 101 CMR 361.00 for individual providers.

This bulletin amends CSN Agency Bulletin 3 by

- extending access to the CSN OT rates established under 101 CMR 361.00 through December 31, 2022;
- streamlining OT authorization requirements; and
- expanding the types of MassHealth funded payers that count towards the threshold to access the CSN OT rate.

This bulletin is effective for dates of service beginning July 1, 2022 through December 31, 2022. All other guidance in CSN Agency Bulletin 3 remains in effect for the dates outlined in the bulletin.

All CSN services, including those reimbursed at an overtime rate, must be delivered in accordance with all applicable program requirements and regulations as set forth in 130 CMR 438.000: Continuous Skilled Nursing Agency.

### **CSN Agency Overtime Access Extension**

MassHealth is extending the temporary access to CSN OT rates for services provided by CSN Agencies for an additional six-month period. CSN Agencies will have access to the CSN Agency overtime rates through December 31, 2022.

### **CSN Agency Overtime Authorization, Documentation Requirements, and Reimbursement**

To streamline the CSN Agency overtime authorization process, MassHealth is making the following changes:

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**Authorization of CSN Agency Overtime**

MassHealth or its designee will proactively authorize OT units for CSN services and establish these units on the CSN Agency's PA for each MassHealth Member. OT CSN units will be designated as a one-time additional allocation equivalent to one weeks' worth of the member's CSN services as authorized by the MassHealth Agency for the CSN Agency. The OT units are not to be used to provide additional CSN services to the member over and above the number of services authorized per week by MassHealth for the member and CSN Agency. Such use could be subject to sanction or overpayment per 130 CMR 450.000.

CSN Agencies that require additional CSN OT units must request a change to the prior authorization. CSN Agencies may make this request through email to [commcase@umassmed.edu](mailto:commcase@umassmed.edu). The email must include the number of units that the CSN Agency needs to have added to each modifier line on the PA. MassHealth or its designee will modify prior authorization through its typical process. All reimbursement rules established under the CSN Agency Manual, including service codes and reimbursement rates, apply.

**Expansion of MassHealth Funded Payers to Qualify a Nurse for OT**

As of July 1, 2022, MassHealth will allow overtime hours worked by the nurse providing services to a member in a MassHealth managed care plan (ACO, MCO, SCO, OneCare, and PACE) to count in meeting the threshold to request and use CSN OT rates.

**Documentation Requirements for CSN Agency Overtime Usage**

In accordance with 130 CMR 438.417 and 130 CMR 403.421, home health and CSN Agencies must participate in any quality management and program integrity processes as requested by MassHealth.

Accordingly, CSN Agencies will be required to provide documentation to MassHealth or its designee demonstrating that the following requirements are met:

1. no other nurses are available and employed by the agency that can adequately provide the CSN services without exceeding 40 hours (through the submission of a signed attestation); and
2. CSN services are provided to MassHealth fee for service or managed care members by the same agency nurse and exceed 40 hours in a given calendar week.

This documentation will be submitted to MassHealth or its designee by January 31, 2023 or as requested by MassHealth.

Failure to submit requested documentation to the MassHealth agency, and in the timeframe requested, may result in administrative sanction in accordance with 130 CMR 450.238.

**MassHealth Website**

This bulletin is available on the [MassHealth Provider Bulletins](#) web page.

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**Questions**

The MassHealth LTSS Provider Service Center is also open from 8 a.m. to 6 p.m. ET, Monday through Friday, excluding holidays. LTSS Providers should direct their questions about this letter or other MassHealth LTSS Provider questions to the LTSS Third Party Administrator (TPA) as follows:

**Phone:** Toll free (844) 368-5184

**Email:** [support@masshealthtss.com](mailto:support@masshealthtss.com)

**Portal:** [www.MassHealthLTSS.com](http://www.MassHealthLTSS.com)

**Mail:** MassHealth LTSS  
PO Box 159108  
Boston, MA 02215

**Fax:** (888) 832-3006