



## PCA OT Update 11/22/16

*4-part approach to ensure continuity of care, budget sustainability, and integrity of the program:*

- **Establishes overtime cap at 50 hours. Establishes both *Temporary Approvals* and *Continuity of Care (COC)* criteria to begin at the expiration of the currently applicable exceptions (the week of January 16<sup>th</sup>)**
  - *Temporary Approvals* apply when a consumer has a temporary need to schedule one PCA to work overtime in excess of 10 hours (e.g., post-acute hospitalization)
  - *Continuity of Care (COC)* approvals last for the duration of the consumer's PCA prior authorization period (includes complex medical needs that require specialized skills, length of consumer-PCA relationship >5 years, and other criteria)
  - Amends PCA regulation to provide for 50 hour cap (which covers ~66% of OT hours)
  - Applies a consistent health and safety cap of 66 hours on *COC* approvals
- **Creates a compliance policy for unauthorized PCA overtime**
  - MassHealth looks forward to working with Stakeholders and SEIU 1199 to develop and implement a compliance policy.
  - The current proposed framework provides for 3 warning letters to PCAs with opportunities of 30 days each to correct the overuse of overtime unless the consumer employer has received authorization to schedule overtime.
  - After the 3<sup>rd</sup> warning and opportunity to correct overuse:
    - PCAs who continue to work overtime per week without authorization would be issued a notice of proposed sanction. The proposed sanction would be termination as a MassHealth provider.
    - Consumers who continue to schedule overtime without authorization would, at minimum, be required to receive additional skills training.
- **Strengthens consumer/ PCA protection and program integrity by implementing Electronic Visit Verification (EVV) by January 2018**
  - Ensures resources go to individuals who need services vs. fraud and abuse
  - Supports identification and closing of care gaps (e.g., PCA does not show up, need back-up triggered)
  - Maintains consumer direction and promotes accountability
  - Implementation of EVV will involve stakeholder engagement
- **Recruits PCAs and supports consumers in finding available PCAs who are not working overtime**
  - Enhances the Rewarding Work website by re-launching on 11/10/16 enhanced Job Posting Board + simplified PCA application
  - Assures more PCAs are registered on the Rewarding Work directory by 12/31/16
    - SEIU 1199 outreaching to PCAs (fliers, face-to-face outreach)
    - UMass will promote PCA sign-up through social media
    - FI's will include fliers in new hire packets for PCAs
    - 5,000 new PCAs registered by 12/31/16
    - Update regulations to require participation in the directory
  - Engages more Consumers to use the directory
    - PCM's will provide Functional Skills Training to consumers on using the directory to hire PCAs
    - Consumers must be signed up on the directory in order to receive an approval
    - 1,000 new consumers registered by 12/31/16