



## PBH Administration Communication Bulletin

FY-0708-AA-10

**To: PBH Network Providers**

**From: Andrea Misenheimer  
Medicaid Project Manager**

**Date: February 26, 2008**

**RE: Home Supports Location of Service**

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As PBH works to implement the renewal of the Innovations Waiver effective April 1, 2008, it appears that there is confusion over the location of service for Home and Community Supports, renamed Home Supports. When PBH wrote and implemented the current Home and Community Supports definition in 2005, the location of services was intended to be the Participant's private residence or the community. The location of service was never intended to be the home of a direct service employee.

The renewed Waiver submitted to the Centers for Medicare and Medicaid Services (CMS) was written in greater detail because of changes in the Waiver Application. PBH also chose to clarify any wording that appeared to be unclear. The location of Home Supports was one instance where it appeared that the service location for a small number of Participants was in a location inconsistent with the intent of the definition. Based on feedback from families, direct service employees, and provider agencies, it appears that there are more Participants impacted by this clarification than originally known. PBH has examined these issues closely and has taken the following actions:

- PBH has submitted a modified Home Supports definition to the Division of Medical Assistance (DMA) to be forwarded by DMA to the Centers for Medicare and Medicaid Services. If approved, Home Supports may be provided in the direct service employee's home in specific situations outlined in the definition.

- The Participant's planning team will consider the location of Home Supports Services. The planning team will determine if the direct service employee's home is the most appropriate location for any Home Supports Service needed by the Participant. The goals and supports must be appropriate for training in the direct service employee's home, if that is the documented location of services.
- The provider qualifications for Home Supports have been modified to allow the location of service to be the direct service employee's home, provided the home meets conditions of the Health and Safety Checklist/Agreement developed by PBH and approved by DMA.
- Monthly monitoring in the employee's home by the Provider Agency or Employer of Record will be required and documented per requirements to be included in the revised 2008 Innovations Manual.
- The Support Coordinator must have access to the direct service employee's home any time the Participant is receiving services at that location for announced and unannounced monitoring.
- The Health and Safety Checklist/Agreement will provide further clarification about requirements of providing Home Supports in the direct service employee's home including:
  - Services provided in the direct service employee's home do not include the Intensive Night Supports component of Home Supports.
  - Services provided in the direct service employee's home are based on the documented needs of the Participant, not for the convenience of the employee.
  - The Individual Support Plan states how the Participant's needs are better met in the direct service employee's home.

Other issues of Clarification include but are not limited to:

- ✓ to the Participant for both announced and unannounced monitoring visits.
- ✓ Home Supports is not billed when the direct service employee is providing direct care to another child or person. If another person is present in the home the Participant's health and safety must be assured.
- ✓ The Participant may not clean or perform other household tasks in the direct service employee's home, including preparing meals for the direct service employee's family.
- ✓ Medication administration regulations are followed for any medications that the Participant is assisted in taking.
- ✓ If the Participant has a goal to learn to evacuate the Participant's private home, that goal must be trained in the Participant's home.
- ✓ The Participant and/or Participant's guardian/family may not be charged for any damage to the Direct Service's Employee's property or any additional charge for the service provided. The issue of liability insurance to cover accidents to/by the Participant is addressed by the Provider Agency.
- ✓ The Innovations Waiver does not pay for room and board costs.
- ✓ The Support Coordinator has access to the service location during hours that services are provided

- ✓ The Provider Agency or Employer of Record will make and document at least a monthly site visit during hours of service provision to make sure that the services provided are consistent with the Individual Support Plan, and that the environment continues to be healthy and safe for the Participant.
- ✓ The Provider Agency agrees to immediately notify the Participant's Support Coordinator if there is any situation that involves the health and safety of the Participant in the Direct Service Employee's home, including providing the Support Coordinator with a copy of any Incident Report. Other Incident Reporting requirements per the Provider Agency's contract with PBH must also be followed.
- ✓ The direct service employee's home must provide for basic safety precautions such as working smoke detectors, carbon monoxide detectors, fire extinguishers, clear evacuation plans, medication lock boxes, and an environment free from safety hazards.

Participants and families are reminded that their Support Coordinator is available to assist them in the transition to the renewed waiver, and to make any needed changes in plans to address location of services issues. Direct Service Employees are reminded to make their agencies or Employers of Record aware of any concerns they have that need to be discussed with PBH. PBH wishes to respect the authority of Agencies and Employers, and will be discussing any concerns brought to their attention by direct service employees with the Agency or Employer.

Thank you for your cooperation as we make these changes.

Attachment: Health and Safety Checklist

**Health and Safety Checklist/Agreement for Home Supports Provided in the Direct Service Employee’s Home**

**Name of Direct Service Employee** \_\_\_\_\_

**Location of Service Address** \_\_\_\_\_

**City, State, Zip Code** \_\_\_\_\_ **Telephone Number at Service Location** \_\_\_\_\_

Assurance	Met	Not Met	Comments
1. The home is free from any hazards that present a risk to the Participant’s health and safety. Appropriate safety preventive devices are in place to include at a minimum of a smoke detector on each level of the home.			
2. Medications, hazardous cleaning supplies, or firearms in the home are kept in a secure (locked) location.			
3. Pets that the Participant comes in contact with have up to date vaccinations. If the pet presents a risk to the safety of the Participant, the pet must be kept in a secure location, separate from the portions of the home accessed by the Participant.			
4. There is an evacuation plan specific to the Participant in the home, and it is tested at least monthly.			
5. If the Participant requires adaptive equipment for services and supports provided in the employee’s home, that equipment must be available. Medicaid does not fund duplicate equipment for the purpose of availability in the employee’s home.			
6. A criminal background check is performed for any adult who lives in the home, who is present during the time the Participant is receiving services. The results of the background check do not present any safety risk for the Participant.			
7. A healthcare registry check is performed for any adult who lives in the home, and who is present during the time the Participant is receiving services. The results of the healthcare registry check do not present any safety risk for the Participant.			

- ✓ The Provider Agency verifies that this information is accurate and has been discussed with the Direct Service Employee providing Home Supports in their own home. This checklist is valid for this location only.
- ✓ Services provided are documented in the Individual Support Plan with the Direct Service Employee’s home listed as the service location.
- ✓ Services provided in the direct service employee’s home do not include the Intensive Night Supports component of Home Supports.

- ✓ Services provided at this location are based on the documented needs of the Participant, not for the convenience of the employee.
- ✓ The Individual Support Plan states how the Participant’s needs are better met in the direct service employee’s home.
- ✓ Home Supports is not billed when the direct service employee is providing direct care to another child or person. If the direct service employee is providing direct care to another child or person, the Participant’s health and safety must be assured.
- ✓ The Participant may not clean or perform other household tasks in the direct service employee’s home, including preparing meals for the direct service employee’s family.
- ✓ Medication administration regulations are followed for any medications that the Participant is assisted in taking.
- ✓ If the Participant has a goal to learn to evacuate the Participant’s private home, that goal must be trained in the Participant’s home.
- ✓ The Participant and/or Participant’s guardian/family may not be charged for any damage to the Direct Service’s Employee’s property or any additional charge for the service provided. The issue of liability insurance to cover accidents to/by the Participant is addressed by the Provider Agency.
- ✓ The Innovations Waiver does not pay for room and board costs.
- ✓ The Support Coordinator has access to the service location during hours that services are provided to the Participant for both announced and unannounced monitoring visits.
- ✓ The Provider Agency or Employer of Record will make and document at least a monthly site visit during hours of service provision to make sure that the services provided are consistent with the Individual Support Plan, and that the environment continues to be healthy and safe for the Participant.
- ✓ The Provider Agency agrees to immediately notify the Participant’s Support Coordinator if there is any situation that involves the health and safety of the Participant in the Direct Service Employee’s home, including providing the Support Coordinator with a copy of any Incident Report. Other Incident Reporting requirements per the Provider Agency’s contract with PBH must also be followed.

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Signature of Provider Agency Representative/Date

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Signature of Direct Service Employee/Date

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Signature of Provider Agency Administrator/Date

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Signature of Participant/Legally Responsible Person/Date

Original Retained in Provider Agency Participant File