

## Monitoring the Delivery of Personal Care Services: Key Considerations for Health Plans

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Health plans increasingly will be required to provide oversight for a broader range of services as more states contract for managed long-term services and supports. These services may include personal care services delivered by direct service workers (DSWs). Monitoring the delivery of personal care services ensures adherence to members' service plans and supports quality of care. Additionally, monitoring the delivery of personal care services can prevent fraud and abuse, ensuring that the services being billed presents options for monitoring the provision of these services.

### Key Considerations

- **Understand vulnerabilities within personal care services.** There are unique oversight issues with coordinating personal care services because these services are provided in the home and generally without supervision. Familiarity with the challenges associated with specific services and methods to address these issues may help your plan implement appropriate solutions. For more information, see The [Department of Health and Human Services Office of Inspector General report](#). Additionally, personal care services can present vulnerabilities for your members as well. Ensure that every member has a back-up support plan listed in their service plan, which should outline what to do in case of emergency or when their regular DSW does not show up.
- **Review state-sponsored initiatives.** Your state may have adopted initiatives to support fraud prevention, such as provider enrollment specifications or electronic visit verification (EVV). Some states require DSWs to enroll as Medicaid providers, while others require employment via a personal care agency; both methods aid the state in oversight of DSWs' credentials and hours billed. Some states require participating plans to contract with a specified EVV vendor. For more information, see the [AARP Policy Institute report on state oversight practices](#).

### Options for Oversight

- **Implement an EVV.** The state may have adopted an EVV system. Even if your state does not require an EVV, your plan may want to consider incorporating EVV into your oversight program. A robust EVV system can ensure that personal care services are scheduled, authorized, and delivered in accordance with members' care plans. It can notify your plan when scheduled services are not provided, which facilitates your plan's ability to ensure appropriate service delivery, ensuring that the care plan is implemented correctly, and avoid paying fraudulent claims. Several states report 10 to 30 percent savings in personal care services associated with the use of EVV systems. EVV systems may also incorporate support for 'real-time' quality measurement. EVV can vary in its implementation; the most common methods are listed below:

- **Telephone-based solutions.** A telephone-based solution uses the telephone located in a member’s home to verify arrival and departure of the DSW. Other features, such as services provided, supplies consumed, and any verbal notes, may be incorporated into the message.
  - **Mobile phones/devices with GPS.** Cell phone GPS or other small geographic trackers are used to monitor the real-time location of staff to ensure they arrive to their tasks on time. They also can assist staff in navigating between members’ homes.
  - **Tablet-based solutions.** In this method, the DSW gathers a signature from the member or member’s caregiver upon arrival and departure from the home to verify the staff’s completion of duties.
  - **Electronic random number match devices.** This method uses a small device that generates random numbers securely located in the member’s home; the number changes at a set interval. The DSW must record the number, or can call in the number from his or her cell phone. These devices can be used when the member does not have a telephone in the home.
- **Check with your home care software support company.** Certain home care software support companies integrate an EVV-like utility into their software. It may be feasible for your health plan to use the existing platform to incorporate tracking and monitoring functionality for your DSWs.
  - **Use alternative data sources.** Your health plan can use data from members’ back-up plan usage and surveys. The use of the back-up plan should trigger an incident report or a reassessment of the service plan. This trigger can be used to identify problems. Additionally, your health plan can use data from member surveys; these surveys may ask members about experience with providers and any unmet needs.

#### Electronic Visit Verification (EVV)

Major EVV vendors include:

- Ankota, Inc.
- August Systems, Inc.
- CareWatch, Inc.
- CellTrak Technologies, Inc.
- HealthWyse, Inc.
- Smart Data Solutions
- Optum, Inc.
- Sandata Technologies, LLC
- Sansio, Inc.

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