



Americare Certified Special Services
Policy, Procedures and Information

TITLE: VENDOR AUDIT PROCESS	Effective Date: 05/05/2006
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Issued By: Miri Bank- Director of Compliance	Approved by: Compliance Committee and Governing Board

Policy:

- ✚ All contracted Home Health Aide Vendor Agencies must comply with all pre employment and annual follow up medical, educational and hiring requirements set forth by the Department Of Health.

Procedure:

- ◆ An on site audit is conducted at least annually on all HHA vendors that Americare CSS has a current contract with.
 - ✚ If non-compliance is identified:
 - Plan of correction will be requested from the vendor underlying the time frame and how the non-compliance will be corrected.
 - Vendor will be placed on hold for future referrals until they will be readited to ensure that non compliance is corrected.
 - ✚ In the event that a non compliance is not corrected within the specified time frame, vendor contract will be terminated.
- ◆ Compliance Department will contact the HHA vendor to schedule a date for an audit.
- ◆ 1 week prior to the scheduled date of the audit, Compliance Department will request a complete Americare CSS patient roster from the HHA Vendor agency.

List will include patient name and the name of the aide that is providing the services to that patient.

- ◆ On the day of the scheduled audit date, Compliance Department will randomly select 10% of Home Health Aide's personnel records (or minimum of 10 files) for review and inform the HHA vendor what files will be reviewed at the time of the audit.
- ◆ Corporate Compliance Officer will obtain a copy of the following documents:
 - ✦ **Agency License of Operation**
 - ✦ **Liability Insurance policy:** Must be current and have Americare CSS name as a beneficiary.
 - ✦ **On-call Policy:** to ensure that agency contact for services are available to patients and personnel twenty-four (24) hours a day, year round.
 - ✦ **Contact information for Administrator, DPS and Compliance Officer**
 - ✦ **Written policies on Electronic Visit Verification (EVV)**
- ◆ Auditor will complete Vendor Audit Tool: (attached form) Ensuring Documentation Compliance.
 - ✦ **Medical**
Pre-employment physical examination, annual examination and PPD/or tuberculosis screening are required for continued employment.
 - **Pre-employment physical:**
 - Must be recent (completed within six (6) months
 - All pre- employment physicals must have attached lab results.
 - Must be signed and stamped by MD
 - **Annual Mantoux /PPD / Chest x-ray:**
 - PPD test is required (pre employment and annually thereafter)
 - Home Health Aide with a history of positive PPD requires Chest X-Ray results to be attached to all physical examinations.
 - Chest X-Ray should be repeated every 10 years.
 - **Annual TB/health assessment questionnaire:**
Home Health Aide with a history of positive PPD must complete an annual Tuberculosis (TB) questionnaire annually.

- **Annual Physical Assessment:**
Home Health Aide must submit annual physical examination signed by MD and/or according to the agency policy (subject for Medicare Approval)
- **Rubella Titer:**
Home Health Aide is required to submit Rubella immunization titers; in the event results indicate Non-Immune Home Health Aide is required to obtain rubella vaccination and titers must be re-drawn by PCP. (Lab results must be attached to the physical exam)
- **Rubeola Titer:**
Home Health Aide born after January 1st 1957 is required to submit Rubeola titer results. In the event Home Health Aide is Non-Immune, vaccination is required and documentation must be on file. (Lab results must be attached to the physical exam)
- **Hep B vaccine immunization:**
Hepatitis B vaccine consent or declination statement must be kept on file
- **Drug Screen:**
-Home Health Aide must submit drug screen results with pre-employment physical. (Lab results must be attached to the physical exam).
In the event, Home Health Aide test results are positive; the Home Health Aide is removed off the case immediately.
-For annual follow up, psychical examination form must include certification by a clinician that HHA is cleared of all limitations, specifically alcohol and drugs.
-HHA might be asked to obtain as additional Drug Screens as needed.

✚ **Hiring:**

- **Application:**
Employment Application that includes Home Health Aide personal information, previous work history, and reference information should be kept on file.
- **Social Security Number:**
Copy of SS card kept on file

- **Work eligibility based on status:**
 -USA citizen/USA Resident/Alien Resident with work authorization.
 -Verify and document expiration dates if applicable.
- **Immigration Form (I-9):**
 -Verify that all documents are listed in the appropriate columns.
 -Documents listed must be kept on file. Copy must include stamp “Original Documents seen”
 -Form must be signed and dated by both, the HHA and the HR representative
- **2 Verified References:**
 -References must be obtained from the previous place of employment.
 -Verification of reference must be done by mail or fax. If there is no previous work history, a reference from a clergyman, doctor or other professional may be accepted with verification.
- **Exclusion Databases (OIG, OMIG, EPLS):**
 Evidence that exclusion/sanctions are done prior to hiring and monthly thereafter.
- **Criminal Background Check:**
 -For all aides hired after April 1st 2005, criminal background checks are required. Criminal background check must be sent on date of hire or soon after that. Home health aides and personal care aides who are compliant with all other requirements of employment may begin work as provisional employees before the agency receives the results of the CHRC. However, the agency is required to provide more stringent supervision of the provisional employee than the usual paraprofessional supervision.
- **Provisional Home Health Aide Supervisions:**
 While the CHRC results are pending, all Home Health aides require weekly supervisions.

 - ▶ Initial supervision must be conducted by a licensed health care professional or a senior home health aide.

- ▶ Subsequent home visits will be made on alternate weeks, by an LPN or by another employee who has been working at the agency for at least one year.
- ▶ In the weeks between home visits, telephonic supervisions will be done by employees who have been working at the agency for at least one year.
- ▶ In the event, the provisional employee is not assigned to any patient on a given week, no supervision can be done, and the record will be kept to indicate the reason.
- ▶ If any name comes back with disqualifying criminal backgrounds, the individual be removed from the case immediately.
- ▶ If no CHRC response is received within 60 days, the Department of Health will be notified. The provisional employee may continue to work but weekly CHRC supervisions will be continued.
- ▶ The Human Resources Department will follow up regularly with the Department of Health when results are delayed.
- ▶ All CHRC Supervisory Visits will be kept on file to ensure compliance with the regulation.

● **Certificate of HHA training:**

- All home health aides must have a certificate issued by DOH or DOE approved school or training program
- All credentials must be verified in the HCR database. This must be done prior to placing the Home Health Aide on the case.

✚ **Compliance:**

● **Competency Evaluation:**

- Home Health Aides who have successfully completed orientation are required to pass the initial competency evaluation prior to work assignment.
- Competency evaluation is conducted by a registered nurse.
- Required to be completed annually thereafter.

● **HIV Confidentiality:**

Home Health Aides must sign and date HIV Confidentiality form. (Initial and annually)

- **Annual Eval by Direct Nurse:**
Mandatory annual evaluation of the home health aide conducted by a nurse.
- **Annual Administrative Employee Performance Evaluation:**
Mandatory annual employee evaluation of the home health aide performance.
- **Orientation:**
Home Health Aide must successfully complete Orientation to disaster plan, Infection control, Standard Precautions, and TB, proficiency in the Electronic Visit Verification System prior to being placed on a case.
- **Emergency Preparedness:**
Home Health Aide must successfully complete orientation to agency's emergency preparedness plan upon hire and yearly after that
- **12 Hours of In-Service:**
-All home health aides must complete at least 12 hours of in-service education annually.
-Psychiatric training must be included in the annual education in order to accommodate a special population served by Americare CSS.
- **EVV Compliance:**
Prior to placing an aide on the case, vendor will ensure all pre employment and annual compliance of the paraprofessional staff as well as EVV training.

◆ Vendor will receive an audit report within 1 week following the audit. If applicable, the report will list all identified issues broken down by the paraprofessional staff.

- ✦ A plan of correction will be requested from the vendor with a set time frame to submit and correct the deficiency.
- ✦ Vendor will be placed on hold for future referrals until they will be readited within 3 months to ensure that deficiency is corrected.
- ✦ In the event that a deficiency is not resolved, vendor contract will be terminated.

- ◆ Vendors that are found to have 100% compliance for at least 2 consecutive years will be audited every 2 years.