

TO: Home Health Agencies

RE: Guidance for Concurrent and Subsequent Home Health Care Services

The Department of Social Services is issuing this provider bulletin to clarify Section 17b-262-729(4) of the Regulations of Connecticut State Agencies, which states:

The department shall not pay a home health agency: when the client is receiving the same home health care services concurrently from another home health care agency. This limitation does not preclude a home health care agency from contracting with another agency as described in section 19-13-D70 of the Regulations of Connecticut State Agencies.

Additionally, Section 17b-262-725(7) of the Regulations of Connecticut State Agencies defines "concurrent" as "in the same time period covered by the care plan".

Based on the context and the overall intent of these provisions, the Department's interpretation of the above-quoted regulation provision is that it applies only when two or more home health agencies are providing the same services to the same HUSKY Health member at the same time during the same day.

A home health agency may provide services to the same HUSKY Health member at different times, even during the same day, as another home health agency, provided that all of the services are medically necessary and comply with all applicable requirements. When a home health agency completes services stipulated in the member's care plan, another home health agency may then provide services to that member. The second home health agency is not required to be under contract to the first.

A home health agency still has the option to sub-contract services to another home health agency (in compliance with the regulations cited above) performed on the same day as part of the treatment plan, that are distinctly different services from the ones provided by the first agency.

Each home health agency must maintain documentation of all services rendered in each member's records in compliance with applicable requirements and which must be made available upon request. Each home health agency must also clearly document the transfer of care between each provider of each home health agency. All services must be medically necessary and must comply with applicable prior authorization requirements and conditions.

In addition to the documentation requirements specifically listed in section 17b-262-735 of the Regulations of Connecticut State Agencies, in any situation in which more than one home health agency is providing services to the same HUSKY Health member on the same date of service, each home health agency must accurately document the start and end time of all services performed on that date of service. In this context, documentation

of start and end times is necessary to comply with section 17b-262-735(c)(5) of the As provided in section 17b-262-735 of the Regulations of Connecticut State Agencies, all

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services performed during home health care visits must be documented in the HUSKY Health member's chart and home health agencies must make this information available to the Department upon request. Regulations of Connecticut State Agencies, which requires "documentation of each service provided and its duration" as well as section 17b-262-729(4), discussed above.

<u>Posting Instructions</u>: Policy transmittals can be downloaded from the web site at www.ctdssmap.com.

Distribution: This policy transmittal is being distributed to providers of the Connecticut

<u>Responsible Unit</u>: DSS, Division of Health Services, Medical Policy and Regulations, Dana Robinson-Rush, Medical Policy Consultant at (860) 424-5615.

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