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Home Care Cost Sharing: Co-payment Adjustments

Aging Services Access Points (ASAPs) are required to:

- determine financial eligibility for the Home Care Program in accordance with 651 CMR 3.00 regulations
- assess a co-payment for Home Care Program services from eligible Applicants
- have policies to ensure compliance with the exception to financial eligibility and co-payment requirements
- have policies to implement the waiver or reduction of co-payments based on hardships that affect a Consumer's ability to pay
- provide a monthly bill for each Consumer for the Co-payment as determined in 651 CMR 3.06(2)(b) or (c)

In accordance with 651 CMR 3.06 (2)(e) ASAPs shall have the ability to waive or reduce Co-payments based on hardships that impact the Consumer's ability to pay. Co-payment adjustments can be requested upon status change at any time during the year.

Examples of hardships include, but are not limited to:

- high medical bills,
- high household bills,
- unforeseen repairs due to inclement weather,
- paying for care of dependents, etc.

A **Co-payment Adjustment Application** has been created within Aging and Disability (A&D) to standardize across the ASAP network the collection of information and support the ASAP practice of Co-payment adjustments.

ASAPs are required to have a *Copayment Adjustment Review and Decision process* that includes:

- a written procedure for the process, including how ASAP staff or Care Managers can offer the option and apply for an adjustment on behalf of the applicant/consumer
- use of either the EOEA Co-Payment Adjustment Application in A & D or an ASAP customized Co-Payment Adjustment Application
- operational implementation,

- and training staff

Key components of the *Copayment Adjustment Review and Decision process* should include:

- how the ASAP staff or Care Manager offer the option of an adjustment to an applicant/consumer
- documentation requirements for the adjustment request
- adjustment request review process
- consumer notification of decision
- process for approvals and denials
- documentation requirements in the consumer's record
- reporting expectations
- process for annual review and extension of adjustments
- process for justification of Co-payment adjustment that supports the identified needs of the consumer
- documentation requirements outlined within this Business Rule

Utilization of the Co-payment Adjustment Application in A & D

Applicants whose annual gross income does not exceed the amounts set forth in the Voluntary Co-payment section of the Financial Eligibility Guidelines shall be requested to make a Voluntary Co-payment toward the cost of Home Care Program Services provided in accordance with the schedule set forth therein per 651 CMR 3.06(2)(b). Applicants whose annual gross income exceeds the income amounts in the Voluntary Co-payment section of the Financial Eligibility Guidelines, and who are found to be responsible for Cost-Sharing with a Fixed or Percent-Based Co-payment shall be afforded the opportunity to request to reduce or waive the Co-payment for services to the ASAP.

The **Co-payment Adjustment Application** records the consumer's financial information and the request to waive/reduce the Co-payment to the ASAP. The Application includes elements such as:

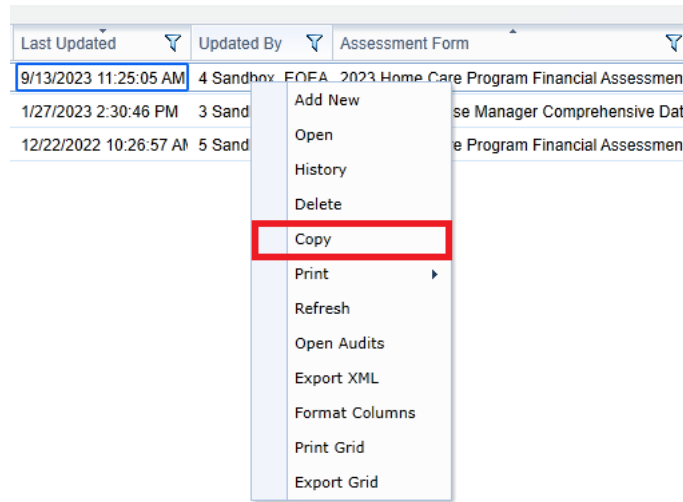
I. Consumer Data:

- Consumer name
- Consumer ID
- Home Care Program Enrollment
- Spouse name
- Spouse ID
- Adjusted Co-payment amount

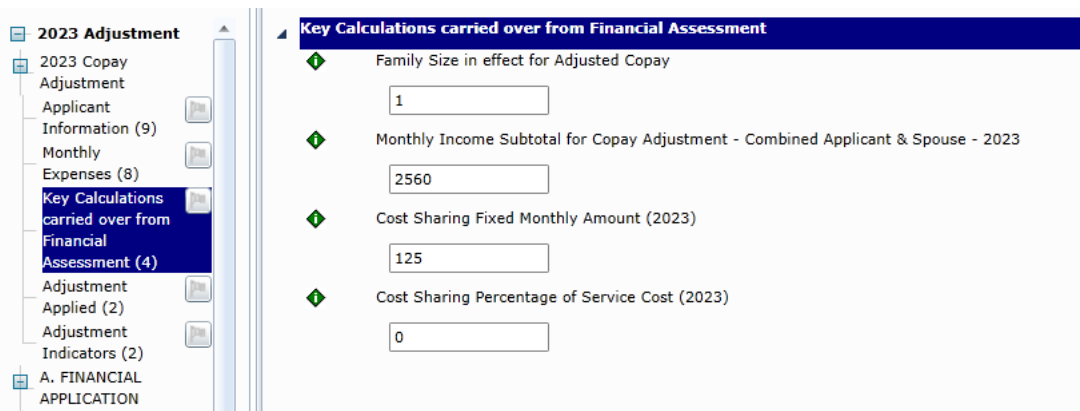
II. Income:

- Total monthly gross income
- Expenses

Once the annual Home Care Program Financial Assessment is completed and saved in the consumers A&D record, the Co-payment Adjustment Application is created by copying from the most recently completed annual Home Care Program Financial Assessment.



- Consumer Demographic information, current financial income and Co-payment information will be pre-populated into the newly created Co-payment Adjustment Application.



- The ASAP staff person will need to enter the applicant’s monthly expenses in the fields in the Co-payment Adjustment Application to illustrate the

identified hardship and support the need for a Co-payment adjustment.

- The ASAP staff person will then update the Co-payment amount to reflect the adjusted amount.

The adjusted Co-payment amount must align with the Co-payment amounts outlined within the cost share schedule.

- if an applicant or consumer is found to have a fixed monthly Co-payment, the adjusted Co-payment amount must be a dollar amount found within the cost share schedule under “Max Fixed Monthly Co-pay” or entered as zero dollars.
- if an applicant or consumer is found to have a percent-based Co-payment, the adjusted Co-payment must be a percentage of the services received in the month found within the cost share schedule under “Monthly Co-pay % of Services Received” or a lesser percentage. The adjusted percentage may be less than

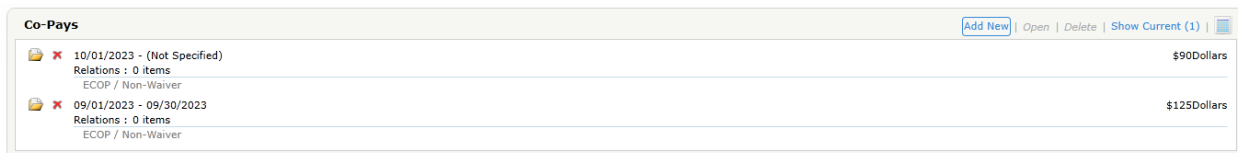
50% and should be adjusted by increments of 5% similar to the cost share schedule.

Documentation of Co-payment Adjustment Approvals in A & D

- Once a Co-payment adjustment request is completed, reviewed, and approved according to the ASAPs *Copayment Adjustment Review and Decision process*, the approved adjusted Co-payment amount:
 - must be recorded in the in the Co-payment and Custom Field section of the consumer’s details page of the A&D record
- If the Co-payment adjustment is linked to a spouse, both electronic records will need to be adjusted and reviewed to ensure accuracy.



- Co-payment adjustments should not be backdated altering past consumer invoices already generated. Adjustment dates should coincide with Co-payment Adjustment Application approval
 - staff must end the existing Co-payment amount
 - add an Adjusted Co-payment amount



- If a consumer is approved for a Co-payment adjustment from the initial assessment, the Co-payment record shall indicate such within A&D; the start date of the adjusted Co-payment amount shall coincide the start date of the consumer’s Home Care Program enrollment and corresponding approved Co-Payment Application.

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Care Enrollments Add New | Open | Delete | Show All (5) | [grid] [refresh]

ECOP / Non-Waiver Active Executive Office of Elder Affairs	09/01/2023 - (Not Specified)
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Co-Pays Add New | Open | Delete | [grid]

09/01/2023 - (Not Specified) Relations : 0 items ECOP / Non-Waiver	\$90Dollars
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- When a consumer has an adjusted Co-payment amount, there are two User Fields within the consumer details in A&D to identify:
 - the adjusted Co-payment
 - and the expiration date of the approval of the Co-payment adjustment
- The expiration date should be updated annually when the Co-payment adjustment is reviewed and approved to be continued.
- A Co-payment adjustment expiration date:
 - aligns with the Co-payment Adjustment Application
 - Must be maintained in the User field for historical purposes
- For consumers that do not have an adjusted Co-payment the default is "Don't Know".

User Fields

Adjusted Expiration Date [calendar icon]

Agency has adjusted co-pay? Yes No Don't Know

- Once the consumer's Co-payment adjustment is recorded within the Details page User Fields section, the Co-payment adjustment and end date populate on the consumer's details page as a Custom Field.

Co-Pays Add New | Open | Delete | Show Current (1) | [grid]

10/01/2023 - (Not Specified) Relations : 0 items ECOP / Non-Waiver	\$90Dollars
09/01/2023 - 09/30/2023 Relations : 0 items ECOP / Non-Waiver	\$123Dollars

Custom Fields Add New | Open | Delete | [grid]

Adjusted Expiration Date: 09/30/2024
Agency has adjusted co-pay?: Yes

Expectations

- Each ASAP must have a written procedure for Co-payment Adjustments that outline the following:
 - a list of qualifying hardships

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- how to identify and engage with consumers when an inability to afford copayments is raised
 - during intakes, re-determinations, and assessments
 - consumer status changes
- timeframe of valid Co-payment adjustment (EOEA recommendation minimum 1 year)
- how the ASAP determines an adjusted Co-payment amount
- instructions for completion of ASAP specific Co-payment Adjustment form or EOEA Co-Payment Adjustment Application (within A&D)
- requirements for data entry in A & D consumer record
- Co-payment adjustments are based on the consumer's individual situation
- All Co-payment Adjustment Applications are required to be reviewed with the consumer annually, or earlier due to a status change dependent on ASAP process.
- The ASAP will address all key components identified in the *ASAP's Copayment Adjustment Review and Decision process*.
- All **Co-payment Adjustment Applications** shall be maintained in the consumer's A&D record:
 - an ASAP specific Co-payment Application must be uploaded to the File Attachments
 - the EOEA Co-Payment Adjustment Application meets this requirement
- All adjusted Co-payment fixed dollar amounts must align with the amounts outlined in the Cost Share schedule or adjusted to zero dollars.
- For consumers enrolled in a % based program:
 - the adjusted Co-payment must remain a percentage of the services received in the month
 - the adjusted percentage may be less than 50%
- The need for and the steps taken to initiate the *ASAP's Copayment Adjustment Review and Decision process* must be documented in the journal notes to include:
 - the statement of hardship
 - reason for the request
 - proposal to alleviate consumers financial situation
- The Adjusted Co-payment must be documented within A&D in the details page under Co-Pays and the user field of the consumer's record
- The completed Co-payment adjustment application shall be updated in the consumer's A&D record

If you have questions regarding this procedure, please contact: Shannon Turner at: Shannon.K.Turner@Mass.gov