



The Commonwealth of Massachusetts
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PROGRAM INSTRUCTION

EOEA-PI-04-21

TO: Aging Services Access Points
Area Agencies on Aging

FROM: Jennifer Davis Carey *JDC*

DATE: December 10, 2004

RE: Comprehensive Service Plan

The Centers for Medicare and Medicaid Services (CMS) recently completed a review of the Massachusetts Home and Community Based Services Waiver for Frail Elders. The review identified areas in which corrective action plans need to be implemented in order to achieve compliance with Federal Regulations. One such area involved the utilization of the Comprehensive Service Plan (CSP).

The September 2004 report from CMS included the recommendation that the State agency (Elder Affairs) require annual preparation of Plans of Care. The letter noted the following:

“Per 1915(c) of the Social Security Act and 42 CFR 441.301(b), State waiver services to recipients in the community must be furnished under a written Plan of Care (POC). In Massachusetts the POC serves as the document by which the State ensures the health and welfare of the individuals served under the waiver. It is meant to be the final arbiter of the services that a client should be receiving. The minimum schedule under which reviews and updates of POCs are to occur is every 12 months i.e. a new POC document is to be developed annually, with all previous POCs retained in the files.”

In order to comply with CMS' recommendation, the following steps must be followed:

1. As part of the annual reassessment to establish continued eligibility for the Waiver, a new CSP must be developed for each client. Attached is a revised version of the CSP which designates space for the date of the annual review/rewrite of the CSP as well as space for the initial service plan date. Please begin using this revised CSP (version 11/26/04) for all new Waiver clients and for current Waiver clients at their next annual reassessment.
2. The service plan shall reflect all services authorized for the client, including services authorized on a "one-time only" basis as well as any increases in services. Please ensure all authorized services are documented on the CSP.
3. The service plan shall reflect both the beginning and end dates of services authorized. Although we understand HOMIS forces the user to input an end date (12/9/2999) when entering initialized services, this date should not be recorded on the CSP as the end date. The space on the CSP designated for the service end date should only be filled in at the time the specific service is terminated. The end date does not need to be filled in when a service has been suspended.

Please contact Jennifer Thoren, Waiver Program Coordinator, with any questions at (617) 222-7557.

Attachment

COMPREHENSIVE SERVICE PLAN

I. ADMINISTRATIVE IDENTIFICATION

Client's Name	Client's Reference #/HOMIS ID	Annual CSP Review Date
aging Services Access Points	Program	Initial CSP Date

II. AGING SERVICES ACCESS POINTS

Service Description	Service Level	Start Date	End Date	Vendor Name
Case Management				

I. OTHER AGENCIES INVOLVED

Service Description	Service Level	Start Date	End Date	Vendor Name

IV. INFORMAL SUPPORTS

Tasks Performed	Frequency	Relationship	Name