Michigan Home Care Responds to Fraud and Abuse. On behalf of the members of the Michigan Association for Home Care, I commend the SE Michigan Medicare Strike Force for aggressive and continued action to fight Medicare fraud. A few weeks ago, Dr. Farid Fata, MD, pleaded guilty to multiple counts of health care fraud, conspiracy to receive or pay kickbacks and money laundering. In total he and collaborators billed $225 million to Medicare, most for unnecessary cancer treatments. His sentence is scheduled for February 23. It appears that Dr. Fata betrayed the trust of patients who suffered and/or died from unnecessary treatment. Dr. Fata was not alone as he collaborated with Home Health providers and others to carry out his fraud. Unfortunately, the Dr. Fata case is not the only fraud in SE Michigan as there have been multiple indictments and convictions since the Strike Force began their work in 2009. There were new indictments announced just last week, and it is uncertain what will be uncovered next. Home Health agencies located in SE Michigan have been involved in fraudulent acts and unfortunately, it gives a black-eye to the home care industry and the medical professions. ♦ Our hearts and prayers go out to the victims and their families. What occurred is tragic and unimaginable to most of us. I believe I speak for all of the members of Michigan Home Care in saying that this cannot continue. Each of us individually and as members of Michigan Home Care must be vigilant in defeating this very serious situation which negatively paints all home care agencies with a broad brush. ♦ “Operation MONGOOSE”. Home care fraud threatens the reputation of all ethical home care businesses, especially when it happens right here in our local communities. We simply cannot remain silent! Please know that Michigan Home Care will continue to take the lead in voicing support for efforts of the FBI, the Department of Justice, Medicare, the Michigan State Police and Attorney General in their pursuit of fraudulent activity. Since 2009 Michigan Home Care has remained in close communication with the Detroit Anti-Fraud Strike Force. We established a liaison with them and attend quarterly Strike Force meetings. We respond to their request to provide names of potential expert witnesses to assist them in case development and trial convictions. Michigan Home Care is proud of our support for the Strike Force and we are proud that our members expect their association to be at the forefront of the fraud problem and remain vigilant like the MONGOOSE in working to clean up those “rats and snakes” that conspire to abuse or defraud our most vulnerable citizens. ♦ The future of Home Care remains very bright. Seniors want to remain in their home and the aging demographics of the senior population will increasingly depend on home care services. Going forward, The Michigan Association for Home Care will remain the voice for the overwhelming majority of home care organizations that care for the health and wellbeing of vulnerable patients and clients. You can count on Michigan Home Care to support you by being a vigilant voice for the industry; initiate practical public policy reforms which combat fraud and patient abuse; offer education which strengthens and promotes ethical behavior and best practices among our members. As an ethical home care provider you too must be willing to report unethical and suspicious activity when you see it in your community. If you witness or suspect Fraud, call the Medicare Fraud Hotline at: http://www.homecaremi.org/home/stop-medicare-fraud/. If you suspect other fraud or elder/patient abuse, contact your local law enforcement office or the Michigan State Police. Last but not least, communicate regularly with your employees, patients, and patient families, to support a culture of trust where the welfare of the patient/client is always the top priority. ♦ www.do1thing.com. Michigan Home Care is a supporting partner with the Michigan Department of Community Health for Disaster planning in our state. Beginning with this edition of the Bulletin we will share one thing each month that each person may do to prepare for or prevent disasters. This month, that “1 thing”

### Public Policy

**Carolyn Flietstra & Lisa White**

♦ The Public Policy Committee met on Friday, September 6. The following is a summary of the topics discussed. ♦ Barry Cargill planned to meet with the congressional delegation in Washington September 9. Special focus on home health Face 2 Face reform, a delay in home health rebasing, and the companionship exemption issue. ♦ Sandi Jones provided an update on SB2 (nurse practitioners) and SB71 (in-home care licensure), also advocacy efforts to improve rates for Children’s Special Health services. ♦ This is the time to meet with candidates or your legislators, as they are in their districts and want to hear from you during the campaign season. ♦ Nick Lyon is the new MDCH Director. ♦ Competitive bidding round two takes effect this fall. Advocacy efforts for change continue. ♦ The Public Policy Committee meets the first Friday of each month at 10:00a.m. We are looking for people from all of the service lines to participate and share their knowledge of the issues that impact your organizations. Our meetings are held by conference call. Please consider calling in, all members are invited to attend. If you are interested in leading a member segment update or have information to share from Private Duty, HME, Hospice or Home Health please contact Lisa White lwhite2@mhc.net, or Carolyn Flietstra Carolyn.flietstra@hollandhome.org.

### Clinical Operations

**Sara Simonds & Coleen Murphy-DeOrsey**

♦ Mark your calendars for May 13-15, 2015 Michigan Association for Home Care - Annual Conference – We have secured high level speakers at member’s request! ♦ T. Brian Callister, MD, FACP, FHM, is a Board Certified Internal Medicine specialist and Hospitalist who is nationally recognized as an expert in both acute care medicine and the post-acute continuum. Dr. Callister will present the opening session as well as an additional session. ♦ William A. Dombi, Vice President for Law, NAHC. Bill Dombi specializes in legal, legislative, and regulatory advocacy on behalf of patients and providers of home health and hospice care. ♦ Arnie Cisneros, PT, president of Home Health Strategic Management, is renowned for his adaptation of traditional care philosophies to address current and future healthcare initiatives. ♦ Adam B. Townshend, Assistant US Attorney, US Attorney’s Office – Western District of Michigan co presented Avoiding Health Care Fraud and Abuse: 2014 Update. ♦ A **Home Health Aide Training Program** has been identified and customized for Association Members. This program will Train RN Instructors to provide and supervise HHA training program. The program will provide certification for three levels of HHA training that includes online modules, skills competency and final exam. ♦ MPRO has new scope of work under new name of Lake Superior Quality Innovation Network. MPRO distributed initiatives for 2014-2019. ♦ HIPAA Audit are currently occurring in various covered entities such as: hospitals, clinics and physician offices. 115 have been completed and only 11% were found in compliance. 350 covered entities have been notified regarding audits to occur this Fall. Make sure that your agencies are developing a HIPAA Program that will pass audit. ♦ Risk Losing RAP Privileges -Some intermediaries are currently denying agencies RAP payment due to late submissions of final claims. Identify processes with your agency to correct late final claim billing so that you are not penalized. ♦ **OASIS C1 - ICD-10** - OASIS submission is changing as of January 1, 2015. OASIS completed December 26, 2014 will be held and submitted through ASAP. Agencies will utilize same log-in and passwords from QIES, though the screens will look different. OASIS C1-ICD-10 will be implemented January 1, 2015. If your M0090 date (Assessment completion date) is on or after 12/31/14, the OASIS C1 – ICD 10 form must be completed and submitted. ♦ **RAC Audits** - RAC audits will be restarting. Contract modifications were made to allow the RAC auditors to resume. ♦ **F2F Proposal 2015** - We are awaiting the final 2015 PPS rule. Sara Simonds submitted a response on behalf of the Michigan Association for Home Care. ♦ **F2F Denials – 5 Record Requests** - Many agencies have received notifications regarding the 5 record requests from Strategic Health Solutions. Agency representatives...
voiced varying results. The notification explained that they must receive further documentation prior to the progressing through the appeals process. ♦ KEPRO is handling Medicare disputes for Michigan. Agencies must complete a Provider Update Form & Agreement and submit to KEPRO. James from KEPRO will be attending our October meeting. ♦ Claims – Certifying/Auditing Physician July 31, 2014 - Certifying and Attending physicians must be submitted on final claims as of July 1, 2014. CMS edits for PECOS and NPI verification will apply to the certifying and attending physicians. ♦ OASIS Accuracy - CMS is establishing a minimum threshold for OASIS submissions starting in July 2015. Make sure someone in your agency is managing the validation reports to assure accurate sequencing and not ignoring warnings and rejections. The minimum threshold will start at 70% accuracy rate and moving up to 90%. ♦ Primary Diagnosis - Starting January 1, 2015, primary diagnosis must be consistent with the current home health plan of care. ♦ Homebound Definition - There has been a CMS Manual System – Pub 100-02 Medicare Benefit Policy – Transmittal 192 with an effective date of September 2, 2014 for Definition of Homebound Patient.

HME/Infusion

Julie Johnson & Brian Griffore

♦ The Michigan Home Care – HME Committee meets next on October 20, 9:30am. This will be a teleconference. Please place the meeting on your calendar and look for the agenda and call number to arrive to you next week. ♦ Fixing the PIC. Thank you to everyone who contacted your State Representative and Senator to report the problem with Public Act 280 and the new requirement for a Pharmacist in Charge (PIC). The new law requires each location where oxygen is re-packaged, distributed, stored, or manufactured to employ a pharmacist one day per week. Know that the new regulation is unreasonable and unintended by legislators voting on the bill. Michigan Home Care Lobbyist, Sandi Jones is working diligently with key players to resolve the issue and is reporting a helpful reception from state regulators and legislators willing to help Fix the PIC. The sponsor of the new law (Senator Joe Hune) and the Michigan Pharmacy Association has committed to helping us resolve the issue. Our lobbying efforts are currently focused on making a change to the law during the short lame duck legislative session scheduled for late November and December. Please join the Committee Call on Monday for an update and to discuss how you can become engaged to fix this serious problem. ♦ Blue Cross – the Michigan Home Care – Blue Cross Liaison Committee will meet November 10. If you have questions you would like addressed to Blue Cross please fill out the form at this link http://www.homecaremi.org/committees/ or contact Mary Pfeiffer (maryp@homecaremi.org) to have a copy forwarded to you. ♦ Kim Sippio, Competitive Bidding Implementation Contractor (CBIC) for Medicare will be joining our HME Committee meeting on November 17, 9:30am, at the Michigan Home Care office. This will be part of the November Committee Meeting agenda. Please join us and bring your competitive bidding questions to this meeting at the Michigan Home Care Offices in Okemos. ♦ More Bidding Help… VGM will be in Ann Arbor for an all day workshop December 11. Michigan Home care is pleased to partner with VGM once again to support their competitive bid preparation workshop to be held in Ann Arbor. This is part of VGM’s national event series which runs November – Mid December and will include presentations by our good friends Mark Higley and John Gallagher. More information will be available at the HME Committee Meeting October 20, and by going to: http://app.certain.com/profile/form/index.cfm?PKformID=0x18583727501

Education

Deb Holman & Coleen Murphy-DeOrsey

♦ Save the date: May 13-15, 2015 – Theme: Motoring Through Change: Enjoy the Ride. The Education Committee has a number of the slots for the 2015 Annual Conference filled. The Conference is planned based on input from the Committees and membership so it’s important that we hear your feedback. ♦ The Michigan Home Care Education Committee will continue to address ICD-10 and OASIS C1 needs as the changes occur. Plans are being made for ICD-10 and OASIS Training for late February and March. ♦ Michigan Home Care has the privilege of bringing in Robert Fazzi from Fazzi Associates to do a Supervision Plus Workshop on November 5th. This workshop is designed specifically for supervisors, managers and directors in home care and hospice agencies. Get your registration in early to save a slot for this event. ♦ Check out the calendar of events on www.homecaremi.org or at the back of this newsletter for the many teleconference opportunities coming up in the next few months. ♦ The Committee is looking for ideas and topics that you would like to be educated on. Please let the Michigan Home Care Office know if you have ideas.

Regulatory

Valerie Ghattas

♦ The Regulatory Committee met on September 18, 2014. We are working on: OASIS C1 – a copy of the OASIS Answers webinar was distributed and reviewed by the members present. It was noted that the clinicians will need training on the stasis ulcer questions because the wording and guidance has changed. Agencies will not submit the OASIS data base beginning 12/26/14 due to software
changes. Clinicians will continue to utilize the OASIS C data base through 12/31/14. On January 1, 2015 the OASIS C1 data base will go into effect. ♦ Compliance review list – Pam Wozniak provided the group with a list of yearly/mandatory compliance requirements. The group began the work of reviewing each item on the list and provided input on how each agency provides the training. The list will be updated and the group will complete the items not reviewed at the next meeting. ♦ Next meeting will be immediately after the Clinical Ops meeting on October 16, 2014.

Reimbursement

Chris Kisell & Amy Gil
♦ The Reimbursement Committee met by Tele-Conference September 17th, 2014. Please join us for the next meeting on-site at 9:30 on October 15th. ♦ The Committee has introduced a few issues to be submitted to BCBSM for the next Liaison meeting. This includes Private Duty Nursing and Assignment of Benefits, Influenza Billing and Blue Cross Complete authorization and denial issues. We hope to have a Liaison meeting with BCBSM the first week of November.
♦ We discussed topics and speakers for next year’s Annual Conference. A lot of good ideas came through. If you have anyone or anything in mind please let us know. Let’s make the Financial Track work for us all. ♦ The Billing Committee is in discussions with Blue Cross and Humana regarding having them speak at a Billing Committee meeting. Web Denis training, etc… ♦ It is that time again for the Benchmarking! We will be sending out a benchmarking form to committee members in the near future. This is for the 3rd quarter of this year. We hope all agencies can participate. The information is confidential and needs to be submitted by November 7th for compilation and distribution at the November committee meeting. LET’S ALL MAKE AN EFFORT TO GET THIS IMPORTANT INFORMATION TOGETHER! ♦ If you have questions or topics, please send them to Amy or I and we’ll get them on the agenda. Let’s share the knowledge and work together to solve our issues. If you would like more information I can be reached by email at CKisell@Crittentonhc.com or by phone at (248)–656-6757. Chris Kisell, Chair of Reimbursement Committee. Amy Gil, Co-chair can be reached by e-mail at Amyg@jessup-group.com or by phone at (734) 981-8820.

Hospice

Rene Wheaton & Laura Bonde
♦ Next meeting is November 6, 2014 at 10:00 a.m. at the Michigan Home Care offices.

Membership

Donald Gillespie
♦ The Committee met on October 6 for a regular meeting focused on several important issues: We reviewed the changes in number of members over the last five years, noting that this is a trend in all health care related associations because of mergers, changes in reimbursement and related operational factors. We are optimistic that growth is possible with careful planning and focused effort.

YEAR NUMBER OF MEMBERS
2009/2010 371
2010/2011 388
2011/2012 376
2012/2013 324
2013/2014 303
♦ The Committee discussed the impact of the new dues structure and determined that it may have been a factor in the reduction of numbers, but was probably not the major reason for the reduction in members. ♦ The focus in the future of the committee will be on recruitment and retention. We discussed several promising recruitment strategies and a decision was made to develop a draft of a detailed Recruitment/Marketing Plan which will focus on strategies, goals, and tactics for attracting new members to Michigan Home Care. Once it has been shared with the board, the plan with timelines, responsible individuals and activities will be implemented by the committee and members who volunteer for various responsibilities in moving the plan forward. ♦ There was a discussion of growing the Membership Committee to include persons from all the service lines in planning, implementing, and guiding the growth activities of the organization. Anyone interested in joining the committee can contact the association office. ♦ There was a brief discussion of the importance of retention of existing members. Our plan is to focus on developing a plan for this activity once the growth plan is in place. ♦ Thanks to committee members for their commitment to growth and retention. Current member are Tom Mann, University of Michigan Home Care Services & Art Homer, Home Care Billing Solutions.

Rehab

Andrea Herbert
♦ The Rehab SubCommittee Met on September 18th. We continue to await the 2015 Final Rule, particularly the proposed changes to the therapy reassessment time points. Ongoing discussion and sharing of resources regarding Maintenance Therapy continues. Refer to www.homecaremi.org for webinars taking place in the near future. We welcomed a few more participants and encourage additional attendees to our next meeting scheduled for November 20, 2014.
Private Duty
Sheila Doeden & Tom Rowley

♦ Michigan Association for Home Care’s Private Duty Committee had a teleconference call on September 16th. Barry gave his updated Executive Directors Report and there was discussion on agenda items: Elections are in November and there will most likely be changes in the house. There will be changes in Committee Chairs that hold seats relevant to Michigan Association for Home Care. The Association will be watching and will let members know who the key people are. ♦ The companionship-exemption lawsuit that is in discussion: we as an Association are encouraging the Department of Labor to extend the date to 1/15/2016. HR 5098 needs co-sponsors in order to extend the mandate.

♦ Bert Copple from Home Instead gave an update on the educational committee’s work for the conference in May 2015. Topics for Private Duty include the Generational Gap, Recruitment and Retention, Veterans Affairs, Collections and Cash flow and Leadership.

PAC
Larry Treece

♦ The PAC Committee met this month to make decisions for candidate investments. As a result we will be writing approximately $8000 in contributions to selected candidates. Criteria for PAC investments included Leadership potential and support for home care issues. Thanks to your generous contributions the PAC members will be delivering 12 candidate checks this week and next. One important contribution will be delivered to Senator Arlan Meekhof who is anticipated to be the new Senate Majority Leader. ♦ If you have not contributed to the PAC this year, please consider making a contribution. State law requires that only individuals (not businesses) make contributions to the PAC. It is important that we support the candidates who support our public policy issues. Please make your contribution payable to: Michigan Home Health PAC, 2140 University Drive, Suite 200, Lansing Michigan 48864. Anyone interested in being on the PAC Committee is welcome. Please contact the Michigan Home Care office to let your interest be known. We welcome your money but also your personal interest and active participation. ♦ Vote November 4. Polls are open all day.
Links of Interest

The Aide's Role in Understanding Patient Fraud and Abuse – October 9, 2014

Utilizing Maintenance Therapy in Your Agency to Elevate Clinical Programs – October 23, 2014

SupervisionPlus Workshop – November 5, 2014

Utilizing Maintenance Therapy in Your Agency to Elevate Clinical Programs - Part 2 – November 6, 2014

MDLARA Questions Needed
http://m360.mhha.org/admin/forms/ViewForm.aspx?id=28910

NGS Questions Needed
http://www.homecaremi.org/submit-question-to-ngs/

BCBS Call for Questions
http://m360.mhha.org/admin/forms/ViewForm.aspx?id=28912

Additional Events
https://www.homecaremi.org/upcoming-events/

Committee Calendar

Complex Rehab Committee – October 10, 2014
Certified Billers Committee – October 23, 2014
Ethics Committee – October 13, 2014
Education Committee – October 21, 2014
HME Committee Teleconference – October 20, 2014
Hospice Committee – November 6, 2014
Public Policy Committee – November 7, 2014
Board of Directors – October 9, 2014
Private Duty Committee – October 21, 2014
Reimbursement Committee – October 22, 2014
Clinical Operations Committee Meeting – October 16, 2014
Regulatory Committee – October 16, 2014

If you are not receiving your Committee Bulletin Board directly at your e-mail, e-mail cindyt@homecaremi.org to be added to our distribution list.