

Connecticut Department of Social Services Medical Assistance Program

Provider Bulletin 2015-28

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Home Health Agencies and CT Home Care Program Providers TO:

RE: Electronic Time Keeping for Home Health Agencies and other Home and Community

Based Service Providers

The Department is clarifying the use of electronic time keeping systems for home health agencies and other home and community based service providers as an alternative to paper time sheets. There are many benefits to the use of electronic time keeping. It may provide a more efficient, accurate system for tracking services provided to home and community based program clients. The systems may use landlines or cell phones with GPS tracking. Electronic time keeping is a method to ensure that home care staff are actually arriving and leaving the client's home as scheduled. Additional benefits include the ability to document services and client progress notes electronically.

Auditing Benefits

Use of electronic time keeping systems may prevent some of the most common audit findings including missing timesheets. documentation of services provided, services not provided due to client not being home, in a facility or otherwise unavailable. Electronic signatures will prevent audit findings such as no client signature on the timesheet, inappropriate signatures and authenticity issues.

Criteria

The following represents the Department's criteria for use of electronic time keeping systems:

The verify system must the employee's attendance by recording the client's name and EMS number, the employee name and password, the

- date of service, the day of the week, the start time of arrival at and the stop time departure from the client's home.
- The system must provide a description of each service performed, start and stop time for each service.
- The system must have the capacity to document skilled nursing, therapy, home health aide, social worker visits and other home and community based services such as companion and homemaker.
- The system must comply with all HIPAA privacy and security provisions, prevent the manipulation of data, unauthorized access to date, and method for client signature.
- The system must verify the telephone number the employee is calling from to ensure this is the client's phone number, and have a control to identify & report on calls from incorrect phone numbers.
- The system must provide an audit trail that provides a security-relevant chronological record of the entries made in the telephony system. At a minimum, the audit trail would list all users logging into the system, the related date and time the information was entered by the users, and identify the purpose of logging into the system. Reports should be generated by the client and/or the provider's employees and for a specific date range.