

ANCILLARY SERVICES IN RESIDENTIAL SETTINGS

Overall, a significant disparity among contracted residential providers indicates some agencies are providing for all care and related service needs to residents within the contracted daily rates, while other settings are billing Lakeland Care District (LCD), its members, or families for services and cost above the daily contracted rate. In an effort to be consistent, LCD believes it is necessary to require that all contracted providers be expected to meet their licensing requirements equally and reflect the full cost of all services in their contracted rates.

Specifically, we have noticed differences with regard to the use of supplementary agencies or units of service for such things as community integration, supportive home care, and daily living skills services. Additionally, we have learned that some facilities request LCD to authorize gloves and nutritional supplements while other facilities include the cost of these expenditures in their contracted rates. The purpose of this memo is to clarify the position of LCD with respect to these supplementary services and goods in residential settings.

Ancillary Agencies or Units of Service

It is the position of LCD that daily living skills training, community integration, and social and recreational services are the responsibility of the CBRF or AFH. A review of the Administrative Codes, HFS 83 and HFS 88, supports this position.

HFS 83 Community Based Residential Facility

HFS 83.33 (2) General Services. Each CBRF shall provide all of the general services at a level and frequency needed by residents and document each service in each resident's individualized service plan. General services are all of the following:

- (a) Supervision....*
- (b) Information and referral....*
- (C) Leisure time activities....*
- (d) Community activities....*
- (e) Family contact*

HFS 88 Adult Family Homes

HFS 88.07 Resident Care (1) GENERAL REQUIREMENTS. *(c)The licensee shall plan activities and services with the residents to accommodate individual residents' needs and preferences and shall provide opportunities for each resident to participate in cultural, religious, political, social and intellectual activities within the home and community...*

HFS 88.07 (2) Services.....(1) (b) (1)..Supervising or assisting a resident with or teaching a resident about activities of daily living.....(2) Providing, arranging transporting or accompanying a resident to leisure activities, employment and other activities.....

Authorization of Gloves and Nutritional Supplements

With respect to the authorization and funding of gloves and nutritional supplements such as Ensure it is likewise the position of LCD that these functions are the responsibility of the facility to meet in their licensure. Prior to Family Care some facilities were billing Title 19 for these items, as a Managed Care Organization (MCO) we are responsible for managing a number of Title 19 benefits and do not believe it is appropriate to fund both the residential setting and the services that are a part of the residential licensing requirement.

Nutritional Supplements

The Administrative Code supports for our position on the responsibility of nutrition:

HFS 83.35 (2) *Modified or special diet. A modified or special diet and dietary supplements shall be provided as ordered by a resident's physician or dietitian.*

HFS 88.07 (4) (e) *Meals prepared by the licensee shall take into account special physical and religious dietary needs of the residents. A special diet shall be served to a resident if prescribed by the resident's physician.*

Gloves

The use of gloves is the facility's requirement in adhering to OSHA standards. It is not the expectation that the LCD fund these services. However, if a LCD member requires specialized care above and beyond the typical needs, LCD will authorize gloves on a person-specific basis. For example, an individual receiving wound care would be an expectation in excess of routine care and gloves could be authorized to meet this service need.

Summary

We hope that providing this information in advance will allow you and your staff time to make any needed changes to your practices. We realize that some facilities will not need to do anything differently while others will need to make substantial changes. We will be sharing this information with ancillary and related service providers to ensure that unauthorized services are not provided with an expectation of funding from LCD.

Questions may be directed to Lakeland Care District Provider Network Director at (920) 906-5127.

If your organization provides services or requires residents to pay for items not included in the contracted rate with LCD you must provide written documentation to LCD as noted in *Addendum 500, Residential and Residential Respite, Providers Prohibited from Collecting Money from Lakeland Care District Members.*