



Standards for Service for Springwell Providers (last updated January 2025)

COMMUNICATION on CONSUMER ISSUES

Springwell's goal is for our Care Managers (CMs) to be aware of all consumer related issues. Provider staff are often our eyes and ears in the consumer's home.

Please contact a consumer's Springwell Care Manager regarding any concerns, including:

- Issues between the consumer, a consumer's family member(s) and a vendor staff member
- Changes in the health or functional ability of a consumer
- Changes in a consumer's home environment
- Questions and recommendations regarding a consumer's services (examples: CM assessed need for additional hours or the recommendation that there be a change from a HHA to a SHCA)

Please contact Springwell staff by using their direct phone number or by their email address. Springwell Care Managers are often in the field and therefore an individual Care Manager may not be available immediately. For matters that cannot wait until the Care Manager returns, Springwell has an on-call Care Manager. If the Care Manager on-call does not answer when you call, please leave a message. They frequently check voice mail and will return your call promptly. (Please note that a complete list of Care Manager phone numbers is shared via email with all of our vendor agencies on a monthly basis.)

When appropriate, Springwell Care Managers will contact the consumer and/or family members about the issues a vendor reports.

Family Members being the workers for our consumers

EOEA's regulations allow family members who are employed by Springwell's vendor agencies to be assigned to a Springwell consumer. If you feel that a family member is an appropriate assignment, Springwell must be made aware of this and approve it prior to the case being assigned. Additionally, if Springwell is made aware that a worker is hoping to provide service to a family member, we will make you aware. When workers provide services to family members, the following must be completed:

- Required unscheduled supervisions (minimum of 2 annually)
- Verification of CORI status and Home Care Registry status (to be confirmed by Vendor HR)
- Signed Springwell attestation regarding the additional scrutiny that will be applied to the case

REQUESTS for SERVICES (RFS)

Springwell's RFS system maintains all service requests from individual Care Managers and sends out an email "blast" each business day listing all requests to those vendors who provide the requested service. Included in this blast is all the information that a vendor needs to determine if they have a worker who can fill a particular case.

Upon receipt of the blast vendors should review the listings and contact the Vendor Services Liaison (VSL) team to pick up any appropriate cases. The VSL team will provide identifying consumer information to the vendor to determine if the case is a good fit. Please note: while most cases are coordinated through the VSL

team, some cases may be coordinated by the Care Manager and will be indicated as such in the “Comments to Vendor” section of the listing.

Once a vendor fills a case, they should email the following to Provider Direct (see the section below), and cc the Care Manager and VSL (if you worked with them to fill the service):

- Name of Worker (first and last)
- Start date of service
- Days and hours of service
- Consumer name, SAMS ID Number & Service Type

PROVIDER DIRECT

Springwell has a team of staff members who manage Provider Direct. They check the Provider Direct email throughout the day, respond to questions, and update consumer records as needed. Vendors should email all administrative communication about Springwell consumers to provider direct at providerdirect@springwell.com.

Please always copy the Care Manager so they are aware of consumer updates as well. For your convenience we have provided a consumer change form (see last page of this document) to assist in making sure we receive all necessary information in order to make adjustments in a timely manner.

Administrative communication includes:

- Confirmation of cases being filled
- Service suspensions – include the reason for suspension and the start and end date
- Service reinstatements
- One time change in worker, day of service, or hours of service – add the aide’s full name; first & last
- Permanent change in worker
- Permanent change in day(s) of service - add last date of service when ending
- Permanent change in total number of hours

All emails to Provider Direct should have only the following in the subject line:

- First name, last initial, Consumer ID and effective date. (We need this for sorting all the emails and helps us to sort and find discrepancies)

Please email this information to providerdirect@springwell.com and cc the Care Manager when it becomes known. Such information should not be held till the end of the month and communicated to Springwell as part of a vendor’s billing preparation process. In turn, Springwell does our best to update Provider Direct as in real time as possible and typically within a 1 week timeframe. If you have a question about what is in Provider Direct or what hasn’t been updated, please email the Provider Direct team.

SERVICE DELIVERY

When Springwell signs a contract with a provider for services, it is our expectation and (for many of the below) EOE’s expectations that the following will happen:

- You, the provider, will employ a sufficient number of staff so as to cover unplanned absences or the sudden departure of workers so our consumers will experience minimum disruption as possible.
- When a worker is assigned to a Springwell consumer, the worker will provide consistent service to that consumer. Multiple no shows, cancellations and/or leaving early all result in the consumer not

receiving the total authorized hours and is disruptive. Continuous occurrences of this would result in a meeting between the vendor agency and the Coordinator of Care Partnerships to discuss solutions and next steps.

- No permanent changes are to be made to a consumer's schedule without prior notification to the appropriate Springwell staff member.
- The provider shall not increase, decrease, or in any way alter the type and amount of authorized service to be delivered to Springwell consumers without approval from the Care Manager. Springwell recommends vendors do not review increases/decreases in authorized services with consumers until approved by the Case Manager.

TIMESHEETS

- Vendors must be able to prove the time workers spent in their home through accurate timesheets for every shift. Consumers must be involved in signing the timesheet as outlined below.
- Timesheets are to be signed (full name) by the consumer on a **daily** basis and the following must be included on the timesheet prior to asking for a signature
 - Consumer's name and worker's name
 - Date of service
 - Service
 - Time the worker started service
 - Time the worker completed service
- Timesheets must list actual hours worked, not scheduled hours. For example, if the timesheet lists service from 10-2 but in actuality it occurred from 12-4, we consider this to be an inappropriate timesheet submission, even if the total hours are the same. Billing inappropriately from the schedule and not actual hours will lead to a financial take-back and fraud investigations as appropriate.
- Please know that we instruct our consumers not to sign inaccurate or blank timesheets. Please share this with your workers and ask that they not pressure a consumer to do so. If a consumer questions the hours listed on a time sheet, your worker should bring it to their supervisor immediately, and your agency should notify Springwell staff to work out the issue with the coordinator.
- If a consumer is unable to sign a timesheet for any reason (blindness, cognitive ability, physical ability to hold a pen), the method by which the hours will be "approved" must be agreed upon with Springwell's Care Manager and Coordinator for Care Partnerships. Approved exceptions to signing time sheets are not determined solely by the vendor agency. Such approvals must be documented in consumer records.
- Please note that timesheets with white out or cross outs that do not include initials or supervisor approval are not acceptable. If these instances are identified during audits, it will be deemed invalid and result in a financial take-back.
- Resolving reports of billing discrepancies:
 - When a consumer or family member reports to Springwell that a worker doesn't stay for the full number of hours yet we see timesheets that reflect all the hours, Springwell expects you, the provider agency, to actively investigate what is happening. This can include:
 - Bringing the worker into your office to get their side of the story
 - An unannounced phone call to the consumer's home at the time when the worker is scheduled to be there to confirm that they are in fact there
 - Making an unannounced visit to the consumer's home for the same reasons.
 - A check-in with other Springwell consumers that the worker services
 - Providing quarterly supervisions and prior months' timesheets to Springwell for quality review

- Depending on the circumstances, Springwell may also do any of the above to ascertain for ourselves what the situation is.
- It is considered fraud for a worker to submit a timesheet for hours not worked, and Springwell is unable to pay for such services. In addition, when we become aware of such instances, we will have the worker pulled from all of our consumers and not allow the worker back with any of our consumers.

Telephony

- Telephony:
 - Telephony systems must use a consumer's phone only.
 - In the event that a consumer does not have a phone available or encounters a transmission issue the worker/vendor agency is responsible to
 - Create a paper timesheet according to the above rules (on-going) or
 - Contact the vendor office upon arrival and departure from the consumer's home to verify the hours in the event of a (temporary) transmission issue
 - Vendors should maintain copies of telephony records for the same period as they would for the signed timesheets in the event that they need to be reviewed for consumer request or for audits
- EVV system must be registered with the EOEA and meet all requirements set by EOEA, including uploading data monthly to the Sandata Data Aggregator. EVV systems must capture:
 - Consumer name and signature
 - Aide name and signature
 - Specific services provided
 - Service locations
 - Service dates
 - Beginning and end times of service
- Vendors must ensure their EVV system has an appropriate geofence range (note that Sandata's geofence is 250 feet.)
- Vendors must have policies and procedures to ensure timely recognition of Telephony and/or EVV system failures and appropriate remediation practices.
- If either Telephony or an EVV system experiences technical issues, vendors must implement paper timesheets immediately until the issues have resolved. As soon as a vendor is made aware of a technical issue with their Telephony or EVV system, they must investigate how many shifts were impacted, and ensure proof of shifts completed by their staff for auditing purposes.
- If a worker forgets to sign in/out and the supervisor makes an adjustment on their end, it needs to be completed in real time and in accordance with all above stated expectations.
- If at any point Springwell pulls timesheets and without corrections or documentation in real time, we may choose to not pay for the hours we were previously billed for and take back applicable funds.

MONTHLY BILLING for SERVICES

Vendors are required to submit a complete and error-free monthly bill via Provider Direct by the 15th of the month following service. Springwell Provider Direct staff checks the Provider Direct mailbox on an on-going basis and updates service plans and resolves issues. This is done on an on-going basis so that vendors can post their services by the 15th of the month.

Springwell can only pay for services that have been delivered to a consumer when the consumer was home to receive them. Springwell expects that you, the provider, will bill us from services recorded on actual

timesheets and not based on a worker's schedule. Springwell expects that you have sufficient practices and internal controls in place to do so and may ask that you detail such procedures if there is a question as to billing for hours not delivered to consumers.

Springwell staff is happy to assist you with fixing errors received when trying to post in Provider Direct. If you send an email asking for help with posting errors that are required to be fixed in order to post your bill please include "billing issue" in the subject line of your email (so it can be identified and made high priority). Bill must be received by close of business on the 15th of the month, error-free.

Please note: Springwell's goal is to fix service plans throughout the month so that there is no delay in your posting bills by the 15th of the month.

When you finish posting your bill, please send an email to providerdirect@springwell.com stating:

- you have posted the invoice
- total \$ amount you billed and posted for that month
- a statement saying: ***"I certify that the services posted for this invoice were delivered to the consumers on the dates and in the amounts as posted. The total is \$xx.xx for x,xxx units"***

Timely billing is expected by the 15th of the next month, but your contract allows for an additional 30 days for charges that have been miscoded or for late timesheets. Late billing is not handled through the Provider Direct billing system. If you have late billing, please email it to providerdirect@springwell.com, separately from the current monthly bill with the subject line should include "Late Billing". Charges after 30 days will not be accepted.

If you had Late Billing, please add an additional statement included on both the Late Billing email and on the monthly billing email to certify any late billing. This helps us to catch if any late billing was not received separately.

"I certify that the late billing for month of ___ services posted for this invoice were delivered to the consumers on the dates and in the amounts as posted. The total is \$xx.xx for x,xxx units"

If you do not have any billing for the current month, please email Provider Direct to let us know.

When Springwell does not pay for billed services we include a detail of what is not being paid with the month's check. If you have a charge listed on your A/R and have not received a check for that charge, this generally means that we didn't receive the billing for that charge. In these situations, follow up with Springwell's AP Accountant immediately.

If Springwell determines that you, the provider, received payments not authorized, such payments may be deducted from a future payment owed to the provider.

COMPLIMENTS and REPORTS of DISSATISFACTION

Springwell tracks all feedback received about the in-home care provided by vendors including feedback received from the following:

- Consumers
- Family members
- Community professionals
- Care managers

- Finance department staff members

These reports include the name of the consumer, the name of the vendor, and the type of issue being reported. All feedback is entered into our software which then sends an email to the identified contact person at your agency. All reports must be reviewed and initially responded to within 48 hours, unless a shorter response time is mandated by the Department of Public Health (DPH) regulations found at 105 CMR 155.00. It is understood that some issues take more than 48 hours to investigate and resolve and that a follow-up email will be necessary. A copy of the DPH report must be sent to Springwell.

Springwell reviews all reports as they come into the agency and is required by EOEa to document a resolution to each report. In addition, Springwell analyzes the data from all reports to identify and respond to trends.

BARRED WORKERS

If Springwell receives sufficient evidence of serious concerns about a worker, they will be removed from any current consumer schedules and placed on a list of Barred Workers which indicates that they cannot service any future Springwell consumers. Reasons for being placed on this list include, but are not limited to:

- Fraudulent billing
- Theft
- Inappropriate behavior, injury, or abuse to a consumer

ENSURING QUALITY

Springwell is continuously engaging in a quality improvement process to help ensure that we are providing the highest quality service possible. Included in this process are the following 3 types of surveys that are required by EOEa:

1. Observation of Point of Service Surveys (OPOS)

A review of vendor activity is conducted annually at a consumer's annual assessment. A consumer's Care Manager is required to conduct this survey with the consumer during the vendor worker's scheduled work time. (Please note that in order to ensure that this survey is conducted at the appropriate time it is imperative that all schedule changes are communicated to the consumer's Care Manager as those changes happen.)

2. Staff Surveys

Springwell Care Managers and Finance department staff complete a survey on each vendor on a semi-annual basis.

3. Consumer Surveys

On an annual basis, Springwell asks all consumers to rate the services they receive from our vendors. Springwell also employs a one-time-only survey for applicable services.

Springwell compiles the results of the above surveys on an on-going basis. Each response is looked at individually and aggregate data on all responses to a particular survey are reviewed to identify trends and implement improvements if necessary. Each vendor receives information on the results of surveys conducted on their services. Please review such feedback as it is received and inform Springwell of any response to such feedback, including changes in procedures.

COMMUNICATION on ADMINISTRATIVE ISSUES

Our goal is to provide vendors with accurate, timely information that supports quality service. The on-going communication Springwell provides vendors may include:

- Total # of consumers vendor served in month
- Total \$ paid to vendor broken down by type of service
- # new requests that vendor picked up
- # new requests that were picked up directly from our daily email blast
- Average # of days from inquiry by your agency to service start date
- Reports of Dissatisfaction and Compliments
- Survey results

CUSTOMER SERVICE

Finally, to be as effective as possible, it is Springwell's policy that all employees respond to phone calls and emails from consumers, family members, and community professionals within one business day. This initial call may only be to inform the caller that his message has been received and that they will be back in contact as soon as they have the information being requested. We ask this of vendors, that your staff strive to return our calls and emails within one business day.

RESOLVING VENDOR ISSUES

As shared above, Springwell has a number of methods to track issues our consumers and staff report about vendors, and in our efforts to treat all vendors in the same manner, we have developed a set of criteria as to the different levels of action we will take.

If any of the below occurs, a phone call will be made to the manager of the provider agency:

- 3 or more complaints in a month or
- The # of complaints in a month >/5% of the # of consumers receiving service from the provider agency
- The # of complaints in a quarter >/5% of the # of consumers receiving service from the provider agency

If the issues persist enough to require a meeting at Springwell, the outcome of the meeting will include next steps, changes needed, and a timeline in which all of these will occur. This will be tracked by the Coordinator of Care Partnerships for the pre-determined period of time. If things do not change as planned or if there are additional complaints, the vendor may be put on a Corrective Action Plan or suspension to new referrals until things are at the agreed upon levels.

POLICIES and PROCEDURES, GENERAL

- The provider will comply with Equal Opportunity and Affirmative Action requirements
- The provider will meet all waiver standards
- The provider agrees that no workers will solicit or accept gratuities or payment from a consumer or family member for services delivered under this contract
- The provider will be evaluated at an on-site audit by Springwell to confirm compliance with EOEA's requirements and Springwell's Standards for Service
- The provider agrees to conduct the following in-house trainings for staff, minimum once per year
 - Conflict of interest
 - Procedure for reporting suspected cases of abuse, neglect, mistreatment and misappropriation of consumer property
 - Rules for completing timesheets (see Timesheets section) and remediation if they are not adhered to

- Procedure for reporting change in schedule with a consumer (both one-time only changes and permanent) to provider coordinator who in turn will report all changes to Springwell via Provider Direct
- Fraud, waste and abuse
- Requirements of Prevention, Reporting and Investigation of Abuse by Homemakers and Home Health Aides (EOEA PI-07-03 and 105 CMR 155)
 - Provider is aware of and fully complies with the rules of PI-07-03 and 105 CMR 155
- Fraud, waste and abuse (see Fraud, Waste and Abuse document for further detail)
 - The provider acknowledges that it is required under federal and state law to have policies and procedures to prevent and detect fraud, waste, and abuse and to educate employees about such laws
- In accordance with PI-11-07 issues by the Executive Office of Elder Affairs, the provider may not require any current or prospective direct care worker to sign a non-compete clause as a condition of employment.
- In accordance with PI-11-06, providers must ensure to the best of their ability that consumers who are Risk level 1 do not experience a service interruption and that the consumers who are Risk level 2 have service priority. In order to meet the needs of these consumers, providers may need to reassign workers from consumers with Risk level 4 (first) and Risk Level 3 (if necessary)
- The provider shall (at a minimum) orient all staff to:
 - The nature of home care and its services
 - Issues related to working with the elderly and disabled adults
 - Procedures and requirements for the delivery of services under this contract
- The provider will maintain all hard copy consumer records in secure locked files. Access to consumer records shall be limited to provider staff involved with the direct care of the consumer and appropriate administrative and supervisory staff.
- The provider will establish appropriate administrative and technical safeguards to ensure the security of electronic consumer data.
- Supervision shall be carried out at least once every three months by a qualified supervisor. In-home supervision shall be done in a representative of consumers. The provider must document the encounter whether written or electronically. Supervisions must include a qualified supervisor's traditional wet signature or an electronic signature that is hand drawn using a mouse or finger. An uploaded picture of the signatory's hand drawn signature is also acceptable.
- Home Health Aide care plans should be signed and returned to the ASAP no later than 10 business days after the first request from our administrative staff. If not received within the 10 business days the Coordinator of Care Partnerships is notified to follow up on requests.
- The provider is allowed to enlist subcontractors when providing service to consumers, but must request and receive the written permission of Springwell to do so. Springwell's preference is that a provider use their own staff. Providers must report all subcontractors to Springwell's Coordinator of Care Partnerships and any changes immediately thereafter. Updates or changes to subcontractors should be sent via letter, which includes the new provider and a brief reason for the change. Subcontractors of vendors agencies are held to the same standards as vendors directly contracted with Springwell Inc. The oversight and monitoring of a subcontractor is the sole responsibility of the provider agency.

Please sign, date and return to Springwell.

By signing the below, I agree to follow all of Springwell's and the Executive Office of Elder Affairs standards for service as included in this document (**Standards for Service for Springwell Providers** updated **January 2025**) and in the contract documents. I also acknowledge that I have shared all information with staff at my agency so they too can ensure that all requirements are being followed.

Provider Name

Provider authorized signature

Title

Printed Name

Date