

**Alabama  
Community Transition  
Waiver  
(ACT)  
Scope of Services**

**Oct. 2011**

**SCOPE OF SERVICE  
FOR  
COMPANION SERVICE  
ACT WAIVER**

A. Definition

Companion Service is non-medical assistance, observation, supervision and socialization, provided to a functionally impaired adult. Companions may provide limited assistance or supervise the individual with such tasks as activities of daily living, meal preparation, laundry and shopping, but do not perform these activities as discrete services. The Companion may also perform housekeeping tasks which are incidental to the care and supervision of the individual. Companion Service is provided in accordance with a therapeutic goal as stated in the Plan of Care, and is not purely diversional in nature. The therapeutic goal may be related to client safety and/or toward promoting client independence or toward promoting the mental or emotional health of the client.

Companion Service is not an entitlement. It is provided based on the needs of the individual client as reflected in the Plan of Care.

B. Objective

The objective of Companion Service is to provide support and supervision that is focused on safety, non-medical care and socialization for clients participating in the ACT Waiver.

C. Description of Service to be Provided

1. The unit of service will be 15 minutes of direct Companion Service provided to the client. The maximum number of units that can be authorized may not exceed four (4) hours daily. The number of units per visit must be indicated on the Plan of Care and the Service Authorization Form. The amount of time authorized does not include the Companion Worker's transportation time to or from the client's home, or the Companion Worker's break or mealtime.
2. The number of units and service provided to each client is dependent upon the individual client's needs as set forth in the client's Plan of Care which is established by the Case Manager and subject to approval by the Medicaid Agency.

Medicaid will not reimburse for activities performed which are not within the scope of services defined.

3. Companion Service includes:
  - a. Supervision/observation of daily living activities, such as,
    - (1) Reminding client to bathe and take care of personal grooming and hygiene;
    - (2) Reminding client to take medication;
    - (3) Observation/supervision of snack, meal planning and preparation, and/or eating;
    - (4) Toileting or maintaining continence.
  - b. Accompanying the client to necessary medical appointments, grocery shopping, and obtaining prescription medications. The Companion Worker is not allowed to transport clients, only to accompany them.
  - c. Supervision/assistance with laundry.
  - d. Performance of housekeeping duties that are essential to the care of the client.
  - e. Assist with communication.
  - f. Reporting observed changes in the client's physical, mental or emotional condition.
  - g. Observing/reporting home safety. The Companion Worker will ensure that the client is residing in a safe environment. Ensuring home safety means the Companion Worker will have a general awareness of the home's surroundings and any concerns with safety issues will be reported to the Companion Worker Supervisor as well as to the Case Manager for follow up.

D. Staffing

The DSP must provide all of the following staff positions through employment or subcontractual arrangements.

1. Companion Worker Supervisors' Qualifications

All Companion Worker Supervisors will have the following qualifications:

- a. High school diploma or equivalent;
  - b. Be able to evaluate Companion Worker in terms of their ability to perform assigned duties and communicate with the individuals;
  - c. Be able to assume responsibility for in-service training for Companion Workers by individual instructions, group meetings, or workshops;
  - d. Submit to programs for the testing, prevention, and control of tuberculosis annually;
  - e. Criminal background check;
  - f. Have references which are verified thoroughly by the DSP and documented in the personnel file. References must include previous employers and the Nurse Aide Registry;
  - g. Have the ability to provide appropriate follow-up regarding a client/caregiver and/or Case Managers dissatisfaction, complaints or grievances regarding the provision of Companion Service;
  - h. Possess a valid, picture identification.
2. All Companions Workers must meet the following qualifications:
- a. Be able to read and write;
  - b. Submit to programs for the testing, prevention, and control of tuberculosis annually;
  - c. Statewide criminal background check;
  - d. Have references which are verified thoroughly by the DSP and documented in the personnel file. References must include previous employers and the Nurse Aide Registry;
  - e. Possess a valid, picture identification;
  - f. Be able to follow the Plan of Care with minimal supervision unless there is a change in the client's condition;
  - g. Complete a probationary period determined by the employer with continued employment contingent on completion of the in-service training program.
3. Minimum Training Requirements for Companion Worker

The Companion Worker training program should stress the physical, emotional and developmental needs of the population served, including the need for respect of the client, his/her privacy, and his/her property. The minimum training requirement must be completed prior to initiation of service with a client. The DSP is responsible for providing/or conducting the training. The Companion Worker training program must be approved by the Operating Agency. Proof of the training must be recorded in the personnel file.

The Companion Worker must successfully complete orientation training in areas specified below prior to providing Companion Services or have documentation of personal, volunteer, or paid experience in the care of adults, families, and/or the disabled, home management, household duties, preparation of food, and be able to communicate observations verbally and in writing.

- a. Meal planning and preparation;
  - b. Laundry/shopping;
  - c. Provision of care and supervision including individual safety;
  - d. First aid in emergency situations;
  - e. Documentation of services provided per written instructions;
  - f. Basic infection Control/Universal Standards;
  - g. Fire and safety measures;
  - h. Assist clients with medications;
  - i. Communication skills;
  - j. Client rights;
  - k. Other areas of training as appropriate or as mandated by the Operating Agency.
4. The annual in-service training will be provided by the DSP and is in addition to the training required prior to job placement.
  5. All Companion Workers must have at least six (6) hours in-service training annually. For Companion Workers hired during the calendar year, this in-service requirement may be prorated based on date of employment as a Companion Worker.
  6. Documentation of the training provided shall include topic, date, name and

title of trainer, objective of the training, outline of content, length of training, list of trainees and location.

7. Topics for specific in-service training may be mandated by the Operating Agency.
8. In-service training may entail demonstration of providing care to the client. Additional training may be provided as deemed necessary by the DSP. Any self-study training programs are limited to four (4) hours annually and must be approved for content and credit hours by the Operating Agency prior to the planned training. The DSP shall submit the proposed program(s) to the Operating Agency at least 45 days prior to the planned implementation.
9. The DSP must have an ongoing infection control program in effect and training on Universal Standards and an update on infection control shall be included as part of the six (6) hours required in-service for all Companion Workers each calendar year.
10. The DSP Agency shall maintain records on each employee which shall include the following:
  - a. Application for employment;
  - b. Job description;
  - c. Statewide criminal background check;
  - d. References which are verified thoroughly by the DSP and documented in the personnel file;
  - e. Record of health (annual tuberculin tests);
  - f. Record of pre-employment and in-service training;
  - g. Orientation;
  - h. Evaluations;
  - i. Supervisory visits;
  - j. Copy of photo identification;
  - k. Reference contacts;
  - l. Other forms as required by State and Federal law, including agreements regarding confidentiality.

E. Procedure for Service

1. The Case Manager will submit a Service Authorization Form and a copy of the Plan of Care to the DSP Agency, authorizing Companion Service and designating the units, frequency, beginning date of service, and types of duties in accordance with the individual client's needs as set forth in the Plan of Care.
2. The DSP Agency will initiate Companion Service within three (3) working days of the designated START DATE on the Service Authorization Form in accordance with the following:
  - a. Services must **not** be provided prior to the authorized start date as stated on the Service Authorization Form:
  - b. The DSP Agency will adhere to the services and schedule as authorized by the Case Manager on the Service Authorization Form. No payment will be made for services unless authorized and listed on the Plan of Care.
3. Provision of Service Authorized:
  - a. Companion Service cannot be provided at the same time as other authorized waiver services are being provided, except for case management.
  - b. Services provided by relatives or friends may be covered only if relatives or friends meet the qualifications as providers of care. However, providers of service cannot be a parent/step-parent/legal guardian of a minor or a spouse of the individual receiving services, when the services are those that these persons are legally obligated to provide. There must be strict controls to assure that payment is made to the relatives or friends as providers only in return for companion services. Additionally, there must be adequate justification as to why the relative or friend is the provider of care and there is documentation in the case management file showing that the family member is a qualified provider and the lack of other qualified providers in remote areas. The case manager will conduct an initial assessment of qualified providers in the area of which the client will be informed. The case manager must document in the client's file the attempts made to secure other qualified providers before a relative or friend is considered. The case manager, along with the DSPs, will review the compiled information in determining the lack of qualified providers for client's living in a remote area.

- c. The Companion Worker is not allowed to provide transportation when he/she is accompanying a client.
  - d. Companion service is available only to those clients who reside alone.
4. Companion Workers will maintain a separate service log for each client to document their delivery of services.
- a. The Companion Worker shall complete a service log that will reflect the types of services provided, the number of hours of service, and the date and time of the service.
  - b. The service log must be signed upon each visit by the client, or family member/responsible party and the Companion Worker. In the event the client is not physically able to sign and the family member/responsible party is not present to sign, then the Companion Worker must document the reason the log was not signed by the client or family member/responsible party.
  - c. The service log will be reviewed and signed by the Companion Worker Supervisor at least once every two (2) weeks. Service logs will be retained in the client's file.
  - d. Client visits may be recorded electronically via telephony. Electric documentation will originate from the client's residence as indicated by the phone number at the residence. A monthly report of phone number exceptions will be maintained with written documentation giving the reason the electronic documentation did not originate at the client's residence, e.g., phone line down, client does not have phone, client staying with relatives. These electronic records may be utilized in place of client signatures.
5. Monitoring of Service
- a. The Companion Worker Supervisor will visit the home of clients to monitor services.
    - (1) The Companion Worker Supervisor will make the initial visit to the client's residence prior to the start of Companion Service for the purpose of reviewing the plan of care, providing the client written information regarding rights and responsibilities, how to register complaints, and discussing the provisions and supervision of the service(s).

The initial visit should be held at the client's place of residence and should include the Case Manager, the Companion



Supervisor, the client and caregiver if feasible. It is advisable to also include the Companion Worker in the initial visit.

- (2) The Companion Worker Supervisor will provide on-site supervision at the client's place of residence at a minimum of every 60 days for each client. Supervisors will conduct on-site supervision more frequently if warranted by complaints or suspicion of substandard performance by the Companion Worker. Supervisory visits must be documented in the individual client record.

The DSP must complete the 60 day supervisory review which includes, at a minimum, assurance that the services are being delivered consistent with the Plan of Care and the Service Authorization Form in an appropriate manner, assurance that the client's needs are being met, and a brief statement regarding the client's condition. A copy of the supervisory visit must be submitted to the Case Manager within 10 calendar days after the 60 day supervisory review.

In the event the on-site supervisory visit cannot be completed in a timely manner due to the client's being inaccessible, the supervisory visit must be completed within five (5) working days following resumption of Companion Service. Documentation regarding this action should be in the DSP client file.

- (3) Each Companion Worker supervisory visit will be documented in the client's file. The Companion Worker Supervisor's report of the on-site visits will include, at a minimum:
  - (a) Documentation that services is being delivered consistent with the Plan of Care;
  - (b) Documentation that the client's needs are being met;
  - (c) Reference to any complaints which the client or family member/responsible party have lodged and action taken;
  - (d) A brief statement regarding any changes in the client's Companion Service needs;
  - (e) The Companion Service Supervisor will provide assistance to Companion Worker as necessary.

- (f) Companion Worker Supervisor must be immediately accessible by phone during the time Companion Service is being provided. Any deviation from this requirement must be prior approved in writing by the Operating Agency and the Alabama Medicaid Agency. If this position becomes vacant, the Operating Agency and the Alabama Medicaid Agency must be notified in writing within 24 hours if the position becomes vacant.
- (g) The Companion Worker Supervisor must provide direct supervision of each Companion Worker with at least one (1) assigned client at a minimum of every six (6) months. Direct supervisory visits must be documented in the Companion Worker's personnel record.
  - Direct supervision may be carried out in conjunction with an on-site supervisory visit.
- (h) The Companion Worker Supervisor will provide and document the supervision, training, and evaluation of Companion Workers according to the requirements in the approved Waiver Document.

6. Missed Visits, and Attempted Visits

a. Missed Visits

- (1) A missed visit occurs when the client is at home waiting for scheduled services, but the services are not delivered.
- (2) The DSP shall have a written policy assuring that when a Companion Worker is unavailable, the Companion Worker Supervisor will assess the need for services and makes arrangements for a substitute to provide services as necessary.

Clients who are designated by the Case Manager as being at-risk should be given first priority when Companion Service visits must be temporarily prioritized and/or reduced by the DSP.

- (a) If the Companion Worker Supervisor sends a substitute, the substitute will complete and sign the service log after finishing duties.

(b) If the Companion Worker Supervisor does not send a substitute, the Companion Worker Supervisor will contact the client and inform them of the unavailability of the Companion Worker.

(3) The DSP will document missed visits in the client's files.

(4) Whenever the DSP determines that services cannot be provided to an at-risk client as authorized, the Case Manager must be notified by telephone immediately. All missed/attempted visits for one week and the reason for the missed/attempted visit must be reported in writing on the "Weekly Missed/ Attempted Visit Report" form to the Case Manager on Monday of each week. Any exception to the use of this form must be approved by the Operating Agency and the Alabama Medicaid Agency.

(5) The DSP may not bill for missed visits.

b. Attempted Visits

(1) An attempted visit occurs when the Companion Worker arrives at the home and is unable to provide services because the client is not at home or refuses services.

(2) If an attempted visit occurs:

(a) The DSP may not bill for the attempted visits.

(b) The Companion Worker Supervisor will contact the client to determine the reason why the client was not present or why services were refused, and document in the client's file.

(c) The DSP will notify the Case Manager promptly whenever an attempted visit occurs and will notify the CM within one (1) working day after the second attempted visit whenever two attempted visits occur within the SAME week.

7. Changes in Services

a. The DSP will notify the Case Manager within one (1) working day of the following changes:

(1) Client's condition and/or circumstances have changed and that the Plan of Care no longer meets the client's needs;

(2) Client does not appear to need Companion Service;

- (3) Client dies or moves out of the service area;
  - (4) Client indicates Companion Service is not wanted;
  - (5) Client loses Medicaid financial eligibility;
  - (6) When services can no longer be provided.
- b. The Case Manager will notify the DSP within one (1) working day if a client becomes ineligible for waiver services.
  - c. If the DSP identifies additional duties that may be beneficial to the client's care, but are not specified on the Plan of Care, the DSP shall contact the Case Manager to discuss having these duties added.
    - (1) The Case Manager will review the DSP's request to modify services and respond within one (1) working day of the request.
    - (2) The Case Manager will approve any modification of duties to be performed by the Companion and re-issue the Service Authorization Form accordingly.
    - (3) Documentation of any changes in a Plan of Care will be maintained in the client's file.
      - (a) If the total number of hours of service is changed, a new Service Authorization Form is required from the Case Manager.
      - (b) If the types or times of services are changed, a new Service Authorization Form is required from the Case Manager.
      - (c) If an individual declines Companion Service or has become ineligible for services, a Service Authorization Form for termination is required from the Case Manager.

8. Documentation and Record-Keeping

- a. The DSP shall maintain a record keeping system for each client that documents the units of service delivered based on the Service Authorization Form. The client's file shall be made available upon request to Medicaid, the operating agencies, or other agencies contractually required to review information.

The DSP shall maintain a file on each client, which shall include the following:

- (1) A current HCBS application;
  - (2) Both current and historical Service Authorization Forms specifying units, services, and schedule of Companion visits for the client;
  - (3) Documentation of client-specific assistance and/or training rendered by the supervisor to a Companion Worker;
  - (4) All service logs;
  - (5) Records of all missed or attempted visits;
  - (6) Records of all complaints lodged by clients or family members/responsible parties and any actions taken;
  - (7) Evaluations from all 60 day on-site supervisory visits to the client;
  - (8) The Service Authorization Form notifying the DSP Agency of termination, if applicable;
  - (9) Initial visit for in-home services;
  - (10) Any other notification to Case Manager;
  - (11) Permission statements to release confidential information, as applicable.
- b. The DSP will retain a client's file for at least five (5) years after services are terminated.
  - c. The DSP Agency shall comply with federal and state confidentiality laws and regulations in regard to client and employee files.

F. Rights, Responsibilities, and Service Complaints

1. The Operating Agency has the responsibility of ensuring that the DSP has fulfilled its duty of properly informing the client of all rights and responsibilities and the manner in which service complaints may be registered.
2. The DSP Agency will inform the client/responsible party of their right to lodge a complaint about the quality of Companion Service provided and will provide information about how to register a complaint with the Case Manager as well as the Alabama Medicaid Agency.

- a. Complaints which are made against Companion Workers will be investigated by the DSP and documented in the client's file.
  - b. All complaints to be investigated will be referred to the Companion Worker Supervisor who will take appropriate action.
  - c. The Companion Worker Supervisor will take any action necessary and document the action taken in the client's and/or the employee's files, whichever is most appropriate based on the nature of the complaint.
  - d. The Companion Worker Supervisor will contact the Case Manager by letter or telephone about any complaint and any corrective action taken.
3. The DSP must maintain documentation of all complaints, follow-up, and corrective action regarding the investigation of those complaints and documentation showing that they have complied with the requirements of this section.

G. Administrative Requirements

In addition to all conditions and requirements contained in the Scope of Service as well as in the contract with the Operating Agency, the DSP shall be required to adhere to the following stipulations:

1. The DSP shall designate an individual to serve as the administrator who shall employ qualified personnel and ensure adequate staff education, in-service training, and perform employee evaluations. This does not have to be a full-time position; however, the designated administrator will have the authority and responsibility for the direction of Companion Service for the DSP Agency. The DSP Agency shall notify the operating agency within three (3) working days in the event of a change in the administrator, address, telephone number, or of an extended absence of the agency administrator.
2. The DSP will maintain an organizational chart indicating the administrative control and lines of authority for the delegation of responsibility down to the "hands on" client care level staff shall be set forth in writing. This shall be readily accessible to all staff. A copy of this information shall be forwarded to the Operating Agency at the time the contract is implemented. Any future revisions or modifications shall be distributed to all staff of the DSP Agency and to the Alabama Medicaid Agency and the Operating Agency.
3. Administrative and supervisory functions shall not be delegated to another organization.
4. A list of the members of the DSP's governing body shall be available to the Operating Agency and the Alabama Medicaid Agency upon request.

5. The DSP Agency will maintain a Policy and Procedures Manual to describe how activities will be performed in accordance with the terms of the Operating Agency contract and the waiver document. The Policy and Procedure Manual should include the organization's Emergency Plan regarding service delivery.
6. The DSP shall acquire and maintain liability insurance during the life of this contract to protect all paid and volunteer staff, including board members, from liability incurred while acting on behalf of the DSP. Upon request, the DSP shall furnish a copy of the insurance policy to the Operating Agencies and/or the Alabama Medicaid Agency.
7. The DSP shall conform to applicable federal, state and local health and safety rules and regulations, and have an on-going program to prevent the spread of infectious diseases among its employee (such as making substitutions for ill Companion Workers and training Companion Workers in personal hygiene and proper food handling and storage).
8. The DSP shall maintain an office which will be open during normal business hours and staffed with qualified personnel.
9. The Direct Service Provider (DSP) shall provide its regularly scheduled holidays to the Operating Agency. The DSP Agency must not be closed for more than four (4) consecutive days at a time and then only if a holiday falls in conjunction with a weekend. The DSP shall also provide the regular hours of business operation. If a service is needed on a scheduled holiday, the service provider will assure that the service is rendered.
10. The DSP Agency must maintain an annual operating budget which shall be made available to the Operating Agency and/or the Alabama Medicaid Agency upon request.

H. Provider Experience

Providers of Companion Service must meet all provider qualifications prior to rendering the Companion Service.

All personnel with direct client contact or access to client information must have complete reference verification and statewide criminal background checks on file prior to client contact or client access.