



Home and Community Support Services Agencies Oversight of Attendants

Girling Community Care

Results in Brief

Why OIG Conducted This Audit

The Texas Health and Human Services (HHS) Office of Inspector General Audit and Inspections Division (OIG Audit) evaluated the Bellaire, Texas, location of Girling Community Care (Girling), a Home and Community Support Services Agency (HCSSA). OIG Audit's annual risk assessment included risks regarding HCSSAs' oversight of attendants providing personal care services, which is a benefit under several Medicaid programs that assists clients with everyday tasks to help them stay in their own homes and communities.

Summary of Review

The audit objective was to evaluate whether Girling (a) developed and performed individualized service plans, (b) performed visit maintenance for selected electronic visit verification (EVV) transactions in accordance with selected regulations, and (c) performed selected oversight activities.

The audit scope included personal care EVV transactions for the period from September 1, 2019, through February 28, 2021, for personal care paid by Amerigroup and UnitedHealthcare, as well as a review of HCSSA oversight activities related to personal attendants.

Conclusion

Girling Community Care (Girling) complied with most Home and Community Support Services Agency (HCSSA) requirements; however, it did not (a) comply with certain electronic visit verification (EVV) visit maintenance requirements, (b) always perform timely attendant background checks, and (c) always retain support to demonstrate field supervisors met qualification requirements.

Key Results

During the audit scope, Girling developed individual service plans (ISPs), performed attendant orientations, and conducted attendant supervisory visits for the clients in the audit sample who received services from the same attendant for at least a year. Girling:

- Prepared individual service plans (ISPs) that included the types of services, frequency and duration of services, plan date of service initiation, and plan of supervision for all 48 sampled clients and ensured the clients agreed on the services and signed the ISPs. The services indicated in the ISPs matched the frequency and duration of services documented in the EVV system and in the managed care organizations' authorization for services.
- Performed new-client orientations for all 40 attendants reviewed. These orientations serve as initial face-to-face contact with the client and as demonstration of competence that the attendant can perform the authorized tasks for the client, as required. In addition, Girling conducted annual evaluations of attendants who were employed for at least a year.
- Had a plan of supervision to obtain client feedback on attendants' performance. Girling conducted attendant supervisory visits annually for those attendants who provided services to the same client for at least a year. Supervisory visits serve as an opportunity to provide oversight of the attendant in the client's home and also give clients a chance to provide feedback on the attendant's performance.

Background

Personal care is a benefit under several Medicaid programs that helps clients with everyday tasks to help them stay in their own homes and communities. Services may include:

- Bathing
- Dressing
- Grooming
- Feeding
- Exercising
- Toileting
- Positioning
- Assisting with self-administered medications
- Routine hair and skin care
- Transfer or ambulation

Girling provides home health care services with 16 locations across Texas. During the audit scope, Girling provided in-home assistance to approximately 19,410 qualified individuals throughout Texas. OIG Audit estimated that, for personal care paid by Amerigroup and UnitedHealthcare, Girling employed 1,236 attendants serving 883 clients in the Bellaire area during the audit scope.

Management Response

OIG Audit presented preliminary audit results, issues, and recommendations to Girling in a draft report dated June 28, 2022. Girling acknowledged the audit recommendations and asserted corrective actions had already been implemented. Girling's management responses are included in the report following each recommendation.

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However, Girling has opportunities to improve its processes for visit verification, staff vetting, and ensuring supervisors meet qualification requirements. Specifically:

- There were 5,071 transactions that required EVV visit maintenance because they were missing service delivery times for personal care.

EVV visit maintenance allows designated staff of a provider to edit one or more data elements of an EVV visit. When the EVV system does not automatically verify an EVV visit, an exception is generated for each part of the visit that could not be auto-verified. Certain EVV visit data must be corrected to accurately reflect the delivery of service. This process is referred to as "completing visit maintenance."

Of those that required visit maintenance, 307 (6.1 percent) did not include all the required data elements, and therefore, were not adequately supported. Not complying with visit maintenance requirements can prevent Girling from ensuring attendant services were provided to clients and can result in payment for services not provided. OIG Audit accepted the clock-in time as evidence that a visit occurred for 44 out of 307 transactions. For the remaining 263 transactions, Girling was paid \$15,353.08 for personal care services for which it did not provide required visit maintenance information or support for the clock-in and clock-out times for the visit.

- Girling performed background searches for all 40 attendants reviewed. However, three attendants' background checks were not performed timely because criminal history checks were conducted after the attendant's first face-to-face contact with the client. Conducting the required background checks timely as required provides additional assurance that attendants are employable and lessens the risk of hiring attendants that may pose a threat to clients.
- Girling was unable to provide support that one of eight supervisors tested met qualification requirements because its personnel record did not contain sufficient evidence to show that the supervisor's education was verified.

Recommendations

OIG Audit offered recommendations to Girling, which, if implemented, will help ensure compliance with EVV, background check, and supervisor qualification requirements. Girling should:

- Strengthen controls over the visit maintenance process to ensure transactions missing service delivery times include the required data elements in the free text field.
- Repay the state of Texas a total of \$15,353.08 for EVV transactions that did not contain required information to support the delivery of personal care services.
- Ensure all required background checks are conducted timely, and maintain documentation to demonstrate that field supervisors meet qualification requirements.