



COMMISSIONER
Adelaide Horn

May 8, 2007

To: Community Based Alternatives (CBA) Home and Community Support Services (HCSS) Agencies
Community Living Assistance and Support Services (CLASS) Agencies
Consumer Managed Personal Assistance Service (CMPAS) Agencies
Deaf Blind and Multiple Disabilities (DBMD) Agencies
Primary Home Care (PHC) Agencies

Subject: Department of Aging and Disability Services (DADS)
Provider Services
Information Letter 07-01
Telephony Usage Update

Telephony is the use of computer software to enable agencies providing hourly-based services (i.e., Attendant Services; Nursing; or Therapies) to call in hours worked through a telephone system, rather than completing paper timesheets. These systems use Caller ID technology to ensure the attendant, nurse, or therapist is placing the "login/logout" calls from the consumer's home, rather than from another location.

Since the release of Provider Services [Information Letter 01-15](#), (regarding telephony software), many agencies have chosen to use this method of service delivery documentation. However, there have been a number of questions raised regarding agency requirements as they relate to telephony, including how to calculate service delivery hours, and questions related to contract monitoring requirements. The purpose of this letter is to clarify telephony requirements and to address frequently asked questions.

As described in [Information Letter 01-15](#), telephony systems must be capable of reporting the total time worked per day for each consumer in actual time as well as total time billed per day and per month for each consumer. Each provider agency opting to use telephony software must also ensure a 'back-up system' is in place in the event the telephony system is unavailable for use. In addition, the back-up system must be used for consumers who choose not to participate in the telephony program. The system must also take into account any rounding done prior to billing.

Question 1: How are service delivery hours calculated?

Answer: Service delivery hours are the equivalent of billable hours. Provider agencies must bill in quarter-hour increments, rounding down to the previous quarter hour if the actual time worked is seven minutes or less. As described above, telephony software must be capable of rounding to the nearest quarter hour. Therefore, if a service provider is scheduled to work a fixed schedule of three hours per day but actually works two hours and fifty-three minutes for a scheduled shift, the billable hours are three. However, if the provider worked two hours and fifty-two minutes, the billable hours are two and three-quarter hours. In this case, since the billable hours were less

than the scheduled hours, the provider must document the reason for underserved hours. Provider agencies are also required to document service overages.

Question 2: How often is the time rounded to the nearest quarter-hour?

Answer: Regardless of the type of service provided, the provider agency may round the service delivery hours only once per billing cycle. At a minimum, hours should be rounded weekly. When determining the appropriate point at which to round billable service hours, the consumer's agreed upon service schedule must be taken into account. In most instances, providers will bill either weekly or bi-weekly based on the billing cycle. More specifically, if the consumer has requested a variable schedule (only hours per day or hours of service per week) the provider agency will round by the service period as applicable. For fixed service schedules the service provider is to work the agreed upon hours at the agreed upon times each scheduled day.

For example, if the provider agency's billing cycle is bi-weekly the agency would round the total hours worked in a two week period.

Question 3: How will DADS contract managers monitor service delivery?

Answer: Service delivery monitoring is based on the agreed upon schedule. If the consumer and the provider agency have agreed upon two hours of service per day, five days per week, then the DADS contract manager will monitor for two hours of billable service for each of the five days. If the agreement is for ten hours of service per week with no specific days or scheduled hours of service, then the contract manager will monitor for total billable weekly hours served.

In the event the consumer has a fixed schedule (specific days of services at a specific time), the contract manager will monitor for the specified service delivery days and times. For example, if a service provider is scheduled to work Monday through Friday 9:00AM to 11:00 AM, then service delivery compliance will be determined by whether or not the agreed upon hours of service were provided at the agreed upon time. If more than seven minutes of the service schedule are missed, the service hours will be rounded back to the prior quarter hour, and the provider agency will be required to document the reason for the delivery discrepancy. During the course of monitoring, the contract manager will review telephony records (actual hours worked) to verify when hours were rounded. Service delivery compliance will also be identified through the use the telephony records.

Question 4: Can you provide some examples of how service hours may be rounded?

Answer: Please see the examples below:

Examples of Billing Compliance

Authorization	Service Schedule	Hours Worked	Hours Billed	Compliance
10 hours per week	10 hours per week	9 hours and 54 minutes	10	Yes
12 hours per week	2.5 hours per day, 4 days per week 2 hours per day, 1 day per week	2.25 hours per day, 5 days = 11.25 hours	12	No Note: Service delivery non-compliance may also equate to fiscal non-compliance
15 hours per week	3 hours per day, 5 days 8am-11am each day	8:05am-11am day 1 8:00am-11am day 2 8:00am-11am day 3 8:00am-11am day 4 8:00am-10:58am day 5	15	Yes

All service delivery documentation hours must be verified by the service provider. Verification is completed through the use of a unique identifier as opposed to the required signature on a paper timesheet.

If you have any questions regarding this letter, please contact your contract manager or program consultant.

Sincerely,

[signature on file]

Barry C. Waller
 Assistant Commissioner
 Provider Services

BCW:ss