4-part approach to ensure continuity of care, budget sustainability, and integrity of the program:

- Establishes overtime cap at 50 hours. Establishes both Temporary Approvals and Continuity of Care (COC) criteria to begin at the expiration of the currently applicable exceptions (the week of January 16th)
  - Temporary Approvals apply when a consumer has a temporary need to schedule one PCA to work overtime in excess of 10 hours (e.g., post-acute hospitalization)
  - Continuity of Care (COC) approvals last for the duration of the consumer’s PCA prior authorization period (includes complex medical needs that require specialized skills, length of consumer-PCA relationship >5 years, and other criteria)
  - Amends PCA regulation to provide for 50 hour cap (which covers ~66% of OT hours)
  - Applies a consistent health and safety cap of 66 hours on COC approvals

- Creates a compliance policy for unauthorized PCA overtime
  - MassHealth looks forward to working with Stakeholders and SEIU 1199 to develop and implement a compliance policy.
  - The current proposed framework provides for 3 warning letters to PCAs with opportunities of 30 days each to correct the overuse of overtime unless the consumer employer has received authorization to schedule overtime.
  - After the 3rd warning and opportunity to correct overuse:
    - PCAs who continue to work overtime per week without authorization would be issued a notice of proposed sanction. The proposed sanction would be termination as a MassHealth provider.
    - Consumers who continue to schedule overtime without authorization would, at minimum, be required to receive additional skills training.

- Strengthens consumer/PCA protection and program integrity by implementing Electronic Visit Verification (EVV) by January 2018
  - Ensures resources go to individuals who need services vs. fraud and abuse
  - Supports identification and closing of care gaps (e.g., PCA does not show up, need back-up triggered)
  - Maintains consumer direction and promotes accountability
  - Implementation of EVV will involve stakeholder engagement

- Recruits PCAs and supports consumers in finding available PCAs who are not working overtime
  - Enhances the Rewarding Work website by re-launching on 11/10/16 enhanced Job Posting Board + simplified PCA application
  - Assures more PCAs are registered on the Rewarding Work directory by 12/31/16
    - SEIU 1199 outreaching to PCAs (fliers, face-to-face outreach)
    - UMass will promote PCA sign-up through social media
    - FI’s will include fliers in new hire packets for PCAs
    - 5,000 new PCAs registered by 12/31/16
    - Update regulations to require participation in the directory
  - Engages more Consumers to use the directory
    - PCM’s will provide Functional Skills Training to consumers on using the directory to hire PCAs
    - Consumers must be signed up on the directory in order to receive an approval
    - 1,000 new consumers registered by 12/31/16