



New England Home Care

Taking Advanced Care Home

Written Testimony William Sullivan, Vice President

New England Home Care

Public Hearing Regarding Bill No. 5500

March 13, 2014

Dear Senator Slossberg and Representative Abercrombie, Senator Markley and Representative Wood and members of the Human Services Committee, we support the testimony of Deborah Hoyt, President and CEO of the Connecticut Association for Healthcare at Home. We are also in favor of Bill No. 5500 and recommend that DSS consider positive audit histories, corporate compliance planning and robust process improvement methods prior to initiating extrapolation methods.

I am William Sullivan, Vice President of New England Home Care and have been working at New England Home Care for the past 23 years. During that time I have worked with DSS on approximately 15 audits. You will never find anyone who will say that going through an audit is a pleasant experience. There is a tremendous amount of work involved as well as fear and anxiety related to the outcome. This fear is primarily due to the DSS ability to use extrapolation to come up with their final audit figures, which in many cases far exceed the findings.

Whenever fear is involved true process improvement cannot take place. In the current system agencies are encouraged to spend more time fighting the identified issue than building in controls to ensure that the problem doesn't continue. In many instances monies and efforts spent by the agency far exceed the final audit exposure.

We support an auditing process at the state, this is not about DSS and their authority to identify and address fraudulent activity. This is about working with compliant agencies and helping them improve without exposing them to the threat of extrapolation.

My recommendation is for agencies to implement an authentic corporate compliance plan. This plan would include such items as appointing a Corporate Compliance Officer, training staff on specific audit issues identified by the state and updating policies and procedures to reflect controls within the agency.

During audits agencies should be given the opportunity to address issues in a corrective action plan and build these items into their ongoing corporate compliance process. The corrective action plan would be submitted to DSS for approval. The plan would identify corrective action, as well as those individuals responsible for over site and an acceptable date of compliance.

Only items found on the initial audit would be recouped from the agency and not extrapolated. Extrapolation would only be used if an agency refused to create a corrective action plan or if an agency's findings rose to a level of fraudulent activity.

Creating a community of providers where compliance is a proactive effort as opposed to a reactive penalty is a better system for everyone.

Thank you for your time and consideration.

Respectfully Submitted,
William Sullivan
Vice President, New England Home Care



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