



Assured Quality Homecare
Feel better at home, be better at home

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DATE: November 2, 2022,

TO: Connecticut General Assembly Aging Committee Homemaker Companion Task Force

SUBJECT: Assured Quality Homecare, LLC November 4th Public Hearing Testimony

Dear Sirs and Madams,

My name is Caleb Roseme, and I am the Chief Operating Officer (COO) of Assured Quality Homecare, LLC, owned and operated by my wife, Samanta Descombes-Roseme. Assured Quality Homecare has been in business for seven years and is based in Norwich, Connecticut. We have a team of dedicated caregivers and office staff who strive to provide clients and families with in-home care services that create relief and peace of mind.

I have written this letter to point out two issues my team and I have observed concerning the statute regulating Homemaker-Companion Agencies (HCAs):

1. The need to implement training requirements for caregivers
2. The need to add personal care services for older adults and individuals with disabilities.

The Importance Of Training Caregivers

The role and responsibilities of caregivers have evolved dramatically over the past two decades, reflecting an increased number of individuals needing services and the increased severity and complexity of their functional limitations. According to the [Paraprofessional Health Institute](#) (PHI), due to changes in the acuity of older adults and individuals with disabilities, caregivers are now providing care to more nursing-home-eligible individuals in home settings than ever before. The preference of our growing population of older adults and individuals with disabilities to stay in their homes and communities and receive care in those settings [are a few factors driving the need for increased caregiver training](#).

Unlike Home Health Aides (HHAs) and Certified Nurses Aides (CNAs), who also provide hands-on care, the [statute for Connecticut HCAs](#) does not provide standards or require training for caregivers. As a result, **ANYBODY** who meets the background check requirements can be hired as a caregiver and placed in the home of older adults and individuals with disabilities to provide care for them without experience, training, or supervision.

The problem is compounded by our healthcare system which relies more and more on home care solutions to help older adults and individuals with disabilities continue living at home within their communities. As a result, there is a severe shortage of caregivers who can care for older adults and individuals with disabilities. Over the next eight years, 8 million new jobs will need to be created to



fill the gap. Public Health Institute, a New York-based direct care workforce advocacy organization, [released a report in 2020 projecting](#) that “the direct care industry will create the most jobs out of any sector in the United States economy.” Personal Care Aides (caregivers) have the [GREATEST current and projected openings of all job sectors in Connecticut](#).

At a time of unprecedented demand for caregivers, Connecticut's relatively undeveloped condition of state training requirements is of concern. It raises the question of whether Connecticut's HCA statute adequately reflects the needs of older adults and individuals with disabilities and the training needed for the complex environments caregivers must operate within.

Our neighboring states, Rhode Island, New York, and New Jersey, require that caregivers be trained. Of the four states, Connecticut is the only state that does not require training or experience from its caregivers. See the table below for more information.

State	Licensed By	Training Standards
Rhode Island	Department of Health (216-RICR-40-10-17)	20 hours of classroom instruction and no less than five (5) hours of practical experience
New York	Department of Health (Title 10/Chapter V/Subchapter C/Article 7/Part 766)	Basic Training (minimum 40-hour training) and Alternative Competency Demonstration (ACD)
New Jersey	Division of Consumer Affairs (Code § 13:45B-13)	76 hours of training (state minimum), demonstrate their skills, and pass a written examination
Connecticut	Department of Consumer Protection (sections 20-670 - 20-690)	None

With the demand for caregivers exceeding that of every other occupation within the state, Connecticut must follow the example of states such as Rhode Island, New York, and New Jersey and prioritize rational training standards and the necessary infrastructure to support our essential caregiver workforce. The absence of training is associated with [higher injury rates, turnover, and poorer job satisfaction](#). It is critically important to note that implementing minimum standards for training and education would ALSO protect the safety and well-being of the caregivers⁷ providing homemaker and companion services, which is an obligation that all employers have under state and federal laws governing workplace safety.



Personal Care Services Are Critical For Home Care

According to Connecticut's HCA statute regulated by Connecticut's Department of Consumer Protection (DCP), Homemaker-Companion Agencies "provide nonmedical, supportive services that ensure a safe and healthy environment for a person in such person's home; such services to include assistance with personal hygiene, cooking, household cleaning, laundry, and other household chores."³ What is missing from the statute is the ability for an HCA to provide personal care services. Personal care services include activities such as bathing, dressing, and grooming. These services are critical for ensuring our older adults and individuals with disabilities reside safely in their homes and participate in their communities. According to a [recent article from Health Affairs](#), the leading journal of health policy thought and research, "the number of people needing these services will more than double, from thirteen million in 2000 to twenty-seven million in 2050."

Connecticut's Department of Social Services (DSS) runs various [Medicaid waiver programs](#), such as The Personal Care Attendant Program, Community First Choice, Money Follows The Person, Connecticut Home Care Program for Elders, and Acquired Brain Injury Program. These programs provide personal care services for older adults and individuals with disabilities the ability to live at home and remain in their community as opposed to entering an institution. These older adults and individuals with disabilities would likely require placement in an institutional environment without the personal care services they receive. The difference is drastic when the DSS personal care aide services are compared to the homemaker services an HCA is allowed to provide. See the table below.

Personal Care Services	Homemaker Services
1. Bathing	1. Assistance with personal hygiene
2. Dressing	2. Cooking
3. Toileting (assistance going to the bathroom)	3. Household cleaning
4. Incontinence (lack of bladder or bowel control)	4. Laundry
5. Feeding Assistance	5. Other household chores
6. Transferring (getting in and out of bed or chair)	6. Companionship

To qualify for DSS Medicaid waiver programs, your income and assets cannot exceed a certain amount, and you must be eligible for Medicaid coverage. Most of Connecticut's older adults and individuals with disabilities do not meet those standards and are not eligible for these DSS programs, so they cannot receive personal care services.

Coincidentally, if you were to browse the [Provider Directory provided by DSS](#), you would find that most of the agencies listed are the same HCAs licensed by DCP. These agencies use the same caregivers to provide personal care services to DSS Medicaid-eligible clients but cannot do the same



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for clients who don't qualify. Additionally, DSS doesn't require HCAs to train or equip their staff differently than they would if they provided homemaker services. The advertising guidelines recently [released by DCP](#) reinforce that HCAs are not allowed to provide nor promote that they provide personal care services. Per the guidelines, HCAs may only state that they participate in programs administered by DSS. The prevention of HCAs providing personal care services to older adults and individuals with disabilities who are not DSS eligible clients has got to change.

It is imperative that the statutes regulating HCAs be reevaluated to expand the scope of services provided to include services such as personal care. Adding personal care services will improve the quality of care our older adults and individuals with disabilities receive so they can reside safely in their homes and participate in their communities. Allowing HCAs to render personal care services would not change the non-medical nature of their services. It would more accurately reflect the reality of the services that HCAs are already being asked to provide to clients in this context.

Conclusion

Caregivers are now providing care to more nursing-home-eligible individuals in home settings than ever before. Older adults and individuals with disabilities need personal care assistance services to live safely in their communities. Connecticut must elevate its standards of care to help our older adults and individuals with disabilities by enabling homemaker-companion agencies to provide personal care services and requiring that these agencies provide competent, caring, and formally trained caregivers.

Connecticut's Department of Social Services recognizes this and has created myriad programs tailored to meet the changing needs of its clients. It's time that Connecticut did the same for those who don't qualify for DSS Medicaid waiver programs by expanding the statutes that govern HCAs to include personal care services and formal training for the caregivers delivering those services. Otherwise, there will no longer be a safety net for our older adults and individuals with disabilities.

About Assured Quality Homecare, LLC:

Assured Quality Homecare is an award-winning home care agency and leader among home care agencies in Connecticut. We are a nationally recognized Best of Homecare® and "World's Greatest!..."® Company, a four-time Employer of Choice award recipient, and a two-time recipient of the Best of Readers Choice Top 3 Home Care Agency award. Our in-house caregiver training, empowerment, and employment program is the only one of its kind and sets the gold standard in home care in Connecticut. For more information about us, visit our website at www.asqhomecare.com.