

Health, Safety and Welfare education Training

2025

Humana requires this training of all subcontractors supporting its contracts for Medicaid or Medicare-Medicaid programs, based on Humana's applicable contractual and regulatory obligations to the states.

Humana

Healthy Horizons[®]
in Ohio

Humana Healthy Horizons in Ohio is a Medicaid Product of Humana Health Plan of Ohio, Inc.
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Notable changes

- Reorganized training
- Added information on training attestation, learning objectives, human trafficking, health and safety protocols, and compliance and legal obligations



Training attestation

All providers—contracted or subcontracted—serving patients with Humana Healthy Horizons® in Ohio coverage can submit an attestation to certify adherence to Medicaid training requirements, as applicable based on Ohio Department of Medicaid (ODM) requirements.

For information on how to complete and attest to completing this training via Availity Essentials™, please refer to [**Humana.com/ProviderCompliance**](https://www.humana.com/providercompliance).

Training topics

No.	Topic	Learning objectives	Slides
1.	General terms	Understand foundational terminology related to ensuring member health, safety and welfare.	5–7
2.	Definitions and types of abuse, neglect and exploitation	Define and categorize types of abuse, neglect and exploitation.	8–12
3.	Signs and symptoms of abuse, neglect and exploitation	Recognize when a patient may be a victim of abuse, neglect or exploitation.	13–22
4.	Prevention strategies for abuse, neglect and exploitation	Describe strategies to prevent abuse, neglect or exploitation.	23–26
5.	Risk factors for abuse, neglect and exploitation	Recognize when a patient may be at risk for abuse, neglect or exploitation.	27–30
6.	Reporting abuse, neglect and exploitation	Understand the methods and requirements for reporting identified or suspected abuse, neglect and exploitation of a member .	31–38
7.	Critical incidents	Understand how to recognize and report critical incidents.	39–40
8.	Human trafficking	Understand how to recognize signs and symptoms of human trafficking, as well as how to report identified or suspected human trafficking.	41–44
9.	References	Recognize Ohio agencies involved in health, safety and welfare	45–47

1. General terms



General terms

- **Abuse (of member)** – The injury, confinement, control, intimidation or punishment of an individual by another person that has resulted, or could reasonably be expected to result, in physical harm, pain, fear or mental anguish. Abuse includes but is not limited to physical, emotional, verbal and/or sexual abuse, as well as use of restraint, seclusion or restrictive intervention that results in, or could reasonably be expected to result in, physical harm, pain, fear or mental anguish to the individual.
- **Fraud** – As defined in Ohio Administrative Code (OAC) rule 5160-26-01, any intentional deception or misrepresentation made by an individual or entity with the knowledge that the deception could result in some unauthorized benefit to the individual, the entity or some other person. This includes any act that constitutes fraud under federal or state law. Member fraud means the altering of information or documents to fraudulently receive unauthorized benefits or knowingly permit others to use the member's identification card to obtain services or supplies.
- **Incident** – An alleged, suspected or actual event that is not consistent with the routine care of, and/or service delivery to, a member. Incidents include the following types of events: abuse, neglect, exploitation, misappropriation and unexplained death.
- **Misappropriation** – Depriving, defrauding or otherwise obtaining money, real estate or personal property (including medication) of a member by any means prohibited by law.
- **Neglect** – When there is a duty to do so, the failure to provide goods, services and/or treatment necessary to assure the health, safety and welfare of an individual.

General terms – continued

- **Network provider** – Consistent with 42 CFR 438.2, any provider, group of providers, or entity that has a network provider contract with the MCO and receives Medicaid funding directly or indirectly to order, refer, or render covered services as a result of ODM's provider agreement with the MCO. A network provider is not a subcontractor by virtue of the network provider contract
- **Provider-preventable conditions** – As defined in 42 CFR 447.26, a condition that meets the definition of a "healthcare-acquired condition" (a condition occurring in any inpatient hospital setting, identified as a healthcare-acquired condition by the secretary under section 1886(d)(4)(D)(iv) of the act for purposes of the Medicare program identified in the Ohio Medicaid state plan as described in section 1886(d)(4)(D)(ii) and (iv) of the act; other than deep vein thrombosis/pulmonary embolism as related to total knee replacement or hip replacement surgery in pediatric and obstetric patients) or an "other provider-preventable condition" (a condition occurring in any healthcare setting) that meets the following criteria:
 - Is identified in the Ohio Medicaid state plan
 - Has been found by the state, based on a review of medical literature by qualified professionals, to be reasonably preventable through the application of procedures supported by evidence-based guidelines
 - Has a negative consequence for the beneficiary
 - Is auditable
 - Includes, at a minimum, wrong surgical or other invasive procedure performed on a patient; surgical or other invasive procedure performed on the wrong body part; surgical or other invasive procedure performed on the wrong patient

2. Definitions and types of abuse, neglect and exploitation



Definitions of abuse, neglect and exploitation

Abuse

Abuse refers to the intentional infliction of harm, injury or suffering on another person. Abuse can be physical, emotional, sexual or financial. Abuse may also include active encouragement of any person by a relative, caregiver or household member to commit an act that inflicts or could reasonably be expected to result in physical or psychological/emotional injury.

Neglect

Neglect is the failure to provide or willful withholding of necessary care, assistance, or supervision or other necessities of life, including, but not limited to, food, clothing, shelter or medical care to an individual, leading to harm or risk of harm. Neglect may be repeated conduct or a single incident of carelessness that results or could reasonably be expected to result in serious physical or psychological/emotional injury or substantial risk of death.

Exploitation

Exploitation involves taking advantage of an individual for personal gain, often financially.

Types of abuse

- **Physical abuse:** inflicting physical pain or injury, such as hitting, slapping or burning
- **Emotional/psychological abuse:** causing mental anguish through threats, intimidation, humiliation or isolation
- **Verbal abuse:** includes, but is not limited to, name calling, intimidation, yelling and swearing. May also include ridicule, coercion and threats
- **Emotional abuse:** verbal assaults, threats of maltreatment, harassment or intimidation intended to compel a child or adult to engage in conduct from which they wish and have a right to abstain. This also includes verbal assaults, threats of maltreatment, harassment or intimidation intended to compel a child or adult to refrain from conduct in which they wish and have a right to engage.
- **Sexual abuse:** any sexual contact or behavior, including unwanted touching, fondling, sexual threats and sexually inappropriate remarks, with someone who did not and/or cannot consent
- **Financial abuse:** illegal or improper use of an individual's funds, property or assets

Type of neglect

- **Physical neglect:** failure to provide basic needs such as food, shelter and medical care
- **Emotional neglect:** failure to provide emotional support, love and affection
- **Medical neglect:** failure to provide necessary medical treatment or medication
- **Self-neglect:** failure of an individual to attend to their own basic needs, such as personal hygiene, appropriate clothing, feeding or tending appropriately to medical conditions
- **Passive neglect:** failure of a caregiver to provide an eligible adult or child with the necessities of life including, but not limited to, food, clothing, shelter or medical care. This definition does not create a new affirmative duty to provide support to eligible adults; nor shall it be construed to mean that an eligible adult is a victim of neglect because of healthcare services provided or not provided by licensed healthcare professionals.

Type of exploitation

- **Financial exploitation:** misuse of or withholding of an individual's funds or assets to the disadvantage of the individual to whom the funds or assets belong or the profit or advantage of a person other than the person to whom the funds or assets belong
- **Labor exploitation:** forcing an individual to work under unfair conditions or without proper compensation.
- **Exploitation of older adults or adults with disabilities:** the illegal use of assets or resources of an adult with disabilities includes, but is not limited to, misappropriation of assets or resources of the alleged victim by undue influence, by breach of fiduciary relationship, by fraud, deception, extortion or in a manner contrary to law. Exploitation is the act of a person who stands in a position of trust and confidence with a disabled adult or an elderly person and knowingly, by deception, intimidation or force:
 - Obtains control over the person's funds, assets or property
 - Deprives the person of the use, benefit or possession of funds, assets or property. This intentional action can be temporary or permanent.
 - Uses the person's funds, assets or property for the benefit of someone other than the disabled adult or elderly person

3. Signs and symptoms of abuse, neglect and exploitation



Signs and symptoms of abuse, neglect and exploitation

Abuse

- **Physical:** unexplained bruises, burns or fractures
- **Emotional:** withdrawal, depression, anxiety or fearfulness
- **Sexual:** bruises around genital areas, unexplained STDs or torn clothing
- **Financial:** sudden changes in financial situations, missing belongings or unauthorized transactions

Neglect

- **Physical:** malnutrition, dehydration, poor hygiene or untreated medical conditions
- **Emotional:** withdrawal, depression or developmental delays
- **Environmental:** unsafe living conditions or lack of basic amenities

Exploitation

- **Financial:** unexplained withdrawals, sudden changes in financial documents or missing property
- **Behavioral:** fearfulness or anxiety around certain individuals or reluctance to discuss financial matters

Additional signs and symptoms of physical abuse

- Sprains, dislocations, fractures or broken smaller bones (e.g., wrist, ankle, finger)
- Burns from cigarettes, appliances or hot water
- Abrasions on arms, legs or torso that resemble rope or strap marks
- Cuts, lacerations or puncture wounds
- Fractures of long bones and ribs
- Bruises, welts or discolorations of the following types:
 - Bilateral (e.g., matching) bruises on both arms that may indicate the member was shaken, grabbed or restrained
 - Bilateral bruising of the inner thighs that may indicate sexual abuse
 - Wrap-around bruises encircling the member's arms, legs or torso that may indicate the individual was physically restrained
 - Clustered bruising on the trunk or another area of the body
 - Bruising in the shape of an object that may have been used to inflict injury
 - Multicolored bruises that may indicate the person sustained multiple traumas over time (e.g., presence of old and new bruises at the same time)

Additional signs and symptoms of physical abuse – continued

- Internal injuries evidenced by pain, difficulty with normal functioning of organs and bleeding from body orifices
- Injuries healing through secondary intention that indicate the member did not receive appropriate treatment, including, but not limited, to:
 - Lack of bandages on injuries or stitches when indicated
 - Evidence of unset bones
- Signs of traumatic hair loss, possibly with hemorrhaging below scalp
- Signs of traumatic tooth loss
- Injuries that are incompatible with the member's explanation
- Inconsistent or conflicting information from family members about how injuries were sustained
- A history of similar injuries and/or numerous or suspicious hospitalizations
- A history of member being brought to different medical facilities for treatment to prevent medical providers from observing patterns
- Delays between the onset of injury and seeking of medical care
- Signs of confinement (e.g., member is locked in their room)

Additional signs and symptoms of sexual abuse

- Vaginal or anal pain, irritation or bleeding
- Bruises on external genitalia, inner thighs, abdomen or pelvis
- Difficulty walking or sitting not explained by other physical conditions
- Stained or bloody underclothing
- Sexually transmitted diseases
- Urinary tract infections
- Inappropriate sex role relationships between victims and suspects
- Inappropriate, unusual or aggressive sexual behavior
- Signs of psychological trauma, including excessive sleep, depression or fearfulness

Additional signs and symptoms of psychological abuse

- Perpetrator berates, ignores, ridicules or curses at a member
- Perpetrator threatens punishment or deprivation
- Member experiences significant weight loss or gain
- Member experiences stress-related conditions
- Perpetrator isolates member by:
 - Isolating the member emotionally
 - Not speaking to or engaging with the member
 - Not touching or providing other methods of comfort to the member
- Member seems depressed, confused or withdrawn
- Member is cowering in the presence of the suspected abuser

Indicators of exploitation

- Weight loss that cannot be explained by other causes
- Lack of toileting that causes incontinence
 - Sitting in own urine and feces
 - Increased falls and agitation
 - Indignity and skin breakdown
- Uncommon pressure ulcers
- Evidence of inadequate or inappropriate use of medication
- Neglect of personal hygiene
- Emotional withdrawal
- Lack of assistance received with eating, drinking, walking, bathing and participating in activities
- Little or no response received to requests for personal assistance

Indicators of exploitation – continued

- Visitors ask the member to sign documents the member does not understand
- Unpaid bills
 - Despite adequate financial resources, bills remain unpaid by the caregiver or other party.
- Lack of affordable amenities for the member, such as personal grooming items or appropriate clothing
- New “best friends” who take an interest in the member’s finances
- Legal documents, such as powers of attorney, which the member did not understand at the time they signed them
- Unusual activity in the member’s bank accounts
 - Includes large, unexplained withdrawals, frequent transfers between accounts or other activity the member cannot explain
- Caregiver expresses excessive interest in the amount of money being spent on the member
- Missing belongings or property

Indicators of exploitation – continued

- Suspicious signatures on checks or other documents
 - Includes signatures not matching the member's
 - Includes signatures and other writing by a member who cannot write
- Absence of documentation about financial arrangements
- Implausible explanations about the member's finances from the member or the caregiver
- Member is unaware of or does not understand financial arrangements that have been made for them

Family and caregiver behavior that may indicate exploitation

Family and caregivers:

- Do not provide an opportunity for members to speak for themselves
- See others who could impact a member's situation without the presence of the member
- Have an attitude of indifference or anger toward the member
- Blame the member for the member's condition
 - For example, accusation that incontinence is a deliberate act
- Show aggressive behavior toward the member
 - Threats
 - Insults
 - Harassment

5. Prevention strategies for abuse, neglect and exploitation



Prevention strategies for abuse, neglect and exploitation

Abuse

- **Education and training:** regular training for staff on recognizing and preventing abuse
- **Screening:** thorough background checks for all employees and volunteers
- **Policies and procedures:** clear policies on reporting and handling abuse cases

Neglect

- **Regular monitoring:** frequent check-ins and assessments of care environments
- **Support services:** providing resources and support to caregivers to prevent burnout
- **Education:** training caregivers on the importance of meeting all aspects of an individual's needs

Exploitation

- **Financial oversight:** regular audits and monitoring of financial transactions
- **Legal protections:** establishing power of attorney or guardianship arrangements to protect vulnerable individuals
- **Education:** informing individuals and their families about the risks and signs of exploitation

Steps to take for prevention

- If you suspect that there is a risk of abuse, neglect or exploitation, you should work with the Humana care manager assigned to the member via the Integrated Care Team.
- When a care manager determines that a member is at risk for abuse, neglect or exploitation but does not display signs or symptoms, the care manager should include specific interventions to reduce the member's risk in the development of the member's care plan.

Care manager interventions

Humana care manager interventions will be tailored to the member's particular risk factor(s) and may include, though need not be limited to, one or more of the following:

- Increased frequency of care coordination face-to-face visits to monitor for potential abuse, neglect or exploitation
- Education of the member on the types, risk factors, associated traits and symptoms of abuse, neglect and exploitation, as well as options for reporting abuse and neglect, including through the care manager or through support agencies, such as Adult or Child Protective Services
- Alert the member's providers, including home- and community-based services (HCBS) providers, of the need for heightened vigilance and surveillance and review of the procedures for notifying the care manager of suspected abuse or neglect
- Seek arrangements for respite for unpaid caregivers, to be provided for in the plan of care
- Increase informal social support for the member through use of community activities or resources (e.g., senior centers, support group or worship attendance)
- Refer member, family or caregiver to mental health/substance use disorder treatment
- Refer member to social service agency if family resources are severely limited

4. Risk factors for abuse, neglect and exploitation



Significance of recognizing risk factors for abuse, neglect or exploitation

- Plan care managers, providers (including participant-directed employees) and other staff having contact with members or caregivers must be able to recognize the risk factors for abuse, neglect and exploitation, including how and when to contact Adult or Child Protective Services.
- It is important to note that the presence of a single risk factor or caregiver contributing factor does not by itself indicate that abuse or neglect is occurring or is likely to occur. It may, however, indicate the need for measures to be taken to reduce the potential for abuse, neglect or exploitation to occur in the future.

Examples of risk factors for becoming a victim of abuse, neglect or exploitation

Likelihood of abuse, neglect or exploitation increases for members in the presence of 1 or more risk factors. These risk factors include:

- Dependency on others for personal care
- Dependency on others for financial management
- Isolation from information about own rights and health
- Diminished mental capacity
- Serious health problems
- Taking medications that affect cognitive status
- Depression, anxiety or fearfulness
- Recent losses, including the loss of a spouse, family member, home or friend

Examples of risk factors for becoming a victim of abuse, neglect or exploitation – continued

Factors and traits exhibited by caregivers who are at risk to abuse, neglect or exploit include:

- Alcoholism
- Mental illness
- Stress
- Chronic fatigue
- Frequent medical consultation
- History of marital violence and/or child abuse
- Previous relationship difficulties
- Conflicting demands of other family members
- Problems with housing, finances and/or employment
- Lack of support; Lack of respite

6. Reporting abuse, neglect and exploitation



“Handle with care” measures

If you identify or suspect actual or potential member abuse, neglect or exploitation, you should use these “handle with care” measures:



Mandated reporters

A mandated reporter is an individual who is required by law to report situations immediately if there is suspicion that an adult or child may have been abused, neglected or exploited or is at risk of being abused, neglected or exploited.

Although the law requires all persons to report suspected abuse, neglect and/or exploitation, certain professionals have a specific responsibility to report. These include, but are not limited to:

- Healthcare providers, behavioral health providers, osteopaths, medical examiners, chiropractors, nurses or hospital personnel engaged in the admission, examination or care and treatment of older people, disabled individuals and children
- Healthcare providers and mental health professionals not listed above
- Social workers or nursing home, adult-living facility, adult day care center or other professional adult or childcare residential or institutional staff
- State, county or municipal criminal justice employees or law enforcement officers
- Human Rights Advisory Committee and Long-Term Care Ombudsman program members
- Banks, savings and loan or credit union officers, trustees or employees

Mandated reporters' rights in Ohio

Mandated reporters have rights under Ohio Revised Code 2151.421:

A representative of the public children services agency shall, at the time of initial contact with the person subject to the investigation, inform the person of the specific complaints or allegations made against the person. The information shall be given in a manner that is consistent with division (I)(1) of this section and protects the rights of the person making the report under this section.

(H)(1)(a) Except as provided in divisions (H)(1)(b) and (I)(3) of this section, any person, healthcare professional, hospital, institution, school, health department or agency shall be immune from any civil or criminal liability for injury, death or loss to person or property that otherwise might be incurred or imposed as a result of any of the following:

(i) Participating in the making of reports pursuant to division (A) of this section or in the making of reports in good faith, pursuant to division (B) of this section.

Responsibilities of mandated reporters

- **Immediate reporting:** Mandated reporters must report any suspicion of abuse, neglect or exploitation immediately to the appropriate authorities. Steps for reporting include:
 - **Identify signs:** Recognize the signs of abuse, neglect or exploitation.
 - **Document observations:** Keep detailed records of observations, including dates, times, and descriptions of incidents.
 - **Contact authorities:** Report the incident to the appropriate state or local agency, such as Adult Protective Services (APS) or Child Protective Services (CPS).
 - **Follow-up:** Ensure the report has been received and that appropriate actions are taken.
- **Confidentiality:** While reporting, the identity of the reporter is kept confidential to protect them from retaliation.
- **Legal protections:** Mandated reporters are protected by law from civil or criminal liability when they report in good faith.

Information to include in a report

- **Personal details:** Name, age and address of the individual
- **Nature of incident:** Description of the suspected abuse, neglect or exploitation
- **Evidence:** Any physical or behavioral signs observed
- **Reporter's information:** Name and contact information of the reporter (kept confidential)



General reporting questions

- Can you identify the person being abused? If known, provide the address and/or location.
- What is the approximate age of the victim?
- Does an emergency exist?
- Can you describe the circumstances of the alleged abuse, neglect or exploitation?
- What are the names and relationships of other members of the adult household (if applicable)?
- Is the victim incapacitated?
- Do you know the name and address of the caregiver (if applicable)?
- Do you know the name and relationship of the alleged perpetrator(s)?
- Are there other people who may have knowledge of the victim?
- Do you know the name of the victim's provider(s)?
- What is your name, address and phone number? (You can report anonymously.)

Reporting requirements for abuse, neglect and exploitation in Ohio

If the patient is in immediate danger, please call 911 or the local police.

Providers must report any suspected abuse, neglect or exploitation to the appropriate state agency:

- Reports of adult abuse can be made to local Adult Protective Services or by calling **855-OHIO-APS (644-6277)**, 24 hours a day, 7 days a week.
- To report suspected abuse or neglect of a child, call the Ohio child abuse reporting directory at **855-OH-CHILD (642-4453)**.

7. Critical incidents



Critical incidents

Critical incidents include, but are not limited to, abuse, neglect, exploitation, misappropriation and inappropriate service delivery while patients receive care from HCBS, nursing facilities and specialized recovery services, per Ohio Administrative Code 5160-43.

Participating providers are required to report critical incidents to Humana Healthy Horizons as soon as possible after the discovery of the incident and no later than 24 hours after the critical incident occurred. Please call **877-856-5707** and be prepared to share:

- Facts relevant to the incident, such as a description of what happened
- Incident type
- Date of the incident
- Location of the incident
- Names and contact information of all persons involved
- Any actions taken to ensure the health and welfare of the individual

Humana and participating healthcare providers shall take immediate action, not to exceed 24 hours after an incident is discovered, to prevent further harm to any and all members and respond to any emergency needs of patients.

8. Human trafficking



Definition of human trafficking

According to the Department of Homeland Security:

Human trafficking involves the use of force, fraud or coercion in exchange for labor, services or a commercial sex act.

- Keep in mind that human trafficking victims have experienced significant trauma and harm. Victims may be unable or prevented from getting help due to existing vulnerabilities. It is important to treat victims with care and respect, and get immediate, professional support to ensure a victim-centered and trauma-informed response.
- Human trafficking is often “hidden in plain sight.” Recognizing the signs is the first step in identifying victims. No single indicator is proof that human trafficking is occurring. The indicators listed on the following slide are a few examples that may alert you to a potential human trafficking situation.*

* [Human Trafficking 101](#), Department of Homeland Security, last accessed Dec. 5, 2024

Signs and symptoms of human trafficking

According to the Department of Homeland Security:

- Act fearful, anxious, depressed, submissive, tense, or nervous particularly around their work or someone they know
- Defer to another person to speak for them and avoid eye contact
- Show signs of physical and/or sexual abuse, physical restraint, confinement or torture
- Show signs of being harmed or deprived of food, water, sleep, medical care, other life necessities or personal possessions
- Someone else is:
 - Restricting the potential victim's contact with friends or family
 - Limiting the potential victim's social media use and/or stalking or monitoring their accounts
 - Preventing the potential victim from socializing or attending religious services
 - Constantly watching or accompanying the potential victim
 - Threatening the potential victim or their family with harm if they leave or quit work
 - Posting harmful content online about potential victim to compel them to engage in a sex act*

Reporting human trafficking



- Report suspected human trafficking to the Homeland Security Investigations (HSI) Tip Line at **866-347-2423** or with the **ICE Tip Form**.
- Get help from the National Human Trafficking Hotline by calling **888-373-7888** or texting HELP or INFO to **233733 (BEFREE)**.
- If you have information on goods produced with forced labor destined for importation into the United States, **provide it to U.S. Customs and Border Protection** and HSI at **ICE.ForcedLabor@ice.dhs.gov**.

9. References





Learn more:

- Ohio Department of Job and Family Services
(<https://jfs.ohio.gov>)
- Office of Families and Children
(<https://jfs.ohio.gov/about/our-offices-bureaus-and-committees/office-of-families-and-children>)

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