HCBS Provider Audits

Qualifications & Acceptable Documentation

July 2023 Provider Training

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Agenda

1. Provider Qualification Audit – Why

2. Process

3. HCBS Background Check Policy Recommendations

4. Qualifications

5. HCBS Provider Portal

Provider Qualification Audit – Why

Provider Qualification Audit – Why

- KDADS Policy Number M2017-171

- MCOs shall monitor and verify all providers to ensure compliance

- KDADS Quality Team will review a sample quarterly each year

MCOs contracted with a single third party to

perform the audits - Averifi

Process

Provider Audit Process – 2023 Requirements

- All individuals who provide HCBS must have all required KDADS background checks completed with no adverse findings prior to providing services. **This includes volunteers, non-Kansas residents and IDD residential providers (foster families).**

- Nurse Aide Registry results are required for <u>all</u> HCBS employees **including those non-certified or nurses.**

- The HCBS Provider will have **30 business days** to comply with the audit.

- The date of the background check **result must be within two years of the start of the audit** to be compliant.   (Example: Audit start date 3/15/2023. The date of the background check results must be between 3/15/2021 to 3/15/2023.

- Averifi will reach out via email to obtain a current list of HCBS employees. This list must include active, inactive, temp or variable staff, paid or unpaid. Note that **if a terminated employee is on the employee list, the provider is still required to provide background check documentation.**

- At the completion of the audit, Averifi will send notification to the provider if the audit was compliant or failed. **Any failed audit will automatically initiate a ReAudit.**
  - The provider will be required to submit compliant documentation upon request.
  - The timeframe will be the same as the original audit.
  - The KanCare MCOs may require additional follow-up.

- Averifi Sends Letter to HCBS Provider

  ‣ Initial contact may be via Postal Mail for new providers to the audit, and Email for providers who have been audited the previous year

  ‣ Introduce Averifi and provide contact info

  ‣ Request list of employees

  ‣ Provide link to State KMAP HCBS Bulletin as well as Waivers and Services information

Provider Qualification Process – Step 2

- The HCBS provider returns the completed employee list to Averifi (info@averifico.com) within 10 business days

  ‣ Please provide complete list in Excel

    ▪ One file per location if you represent multiple facilities

    ▪ Data provided must be in Excel format (not PDF)

  ‣ Please include waiver AND service for each employee

  ‣ Only need employees who work directly with the KanCare (HCBS) population and provide waiver services (Admin staff is not required)

Provider Name: *Hands that Heal (Example)*
Provider KMAP ID: *12519549B*
Date: *4/11/2021*

| Last Name	First Name	Title	Certificate or License? Please list	Do you transport HCBS Recipients?	First date of Serving Medicaid Member (or start date)	Service Location (if same just leave blank)	Waiver (FE, BI, PD, BI, IDD, TA or SED)	Waiver Service(s) (Wellness Monitoring, Adult Day Care, etc.)	Self-Directed (yes or no)
Smith	Tom	Personal Care Worker	RN	No	10/15/2019		FE, IDD	FE - PCS Level I & II, IDD - Medical Alert Rental, Supportive Home Care	No
Doe	Jane	Direct Support Associate	LPN	No	3/10/2018	Wichita Area	TA	Specialized Medical Care	No
Jones	Jennifer	Personal Care Worker	CMA	Yes	4/5/2005	Topeka and Wichita	FE/PD	FE/PD -Personal Care Services FE - Nursing Evaluation	No

Note that Self-Directed is for FMS providers only.

Provider Qualification Process – Step 3

- Averifi selects **employees to be audited** based on sampling methodology
  - ▸ At least one employee will be selected for each waiver and/or service
  - ▸ At least one employee per location if all locations are combined
  - ▸ Employees who have been audited in the past will not be pulled into the current year sample unless there is a situation where the provider has a small number of employees, and the employee will need to be selected again.

Number of Employees	Sample Size
1-10	2 employees or total employee records whichever is less
11-20	3 employee
21-39	4 employee
40-54	5 employee
55 and above	Sample will be calculated based on 10% of total employee

Provider Qualification Process – Step 4

- Averifi sends email to summarize next steps
  - ▸ Due date for all required documentation **(30 days max from request)**
  - ▸ Provide list of documents required
  - ▸ Provide list of employees who are selected for Audit
  - ▸ Provide Averifi rep contact information
  - ▸ Discuss next steps including portal access and usage
- Averifi sends the "Welcome to Averifi HCBS Provider Audit Portal" email (Provider Portal Guidance PPT included as an attachment)
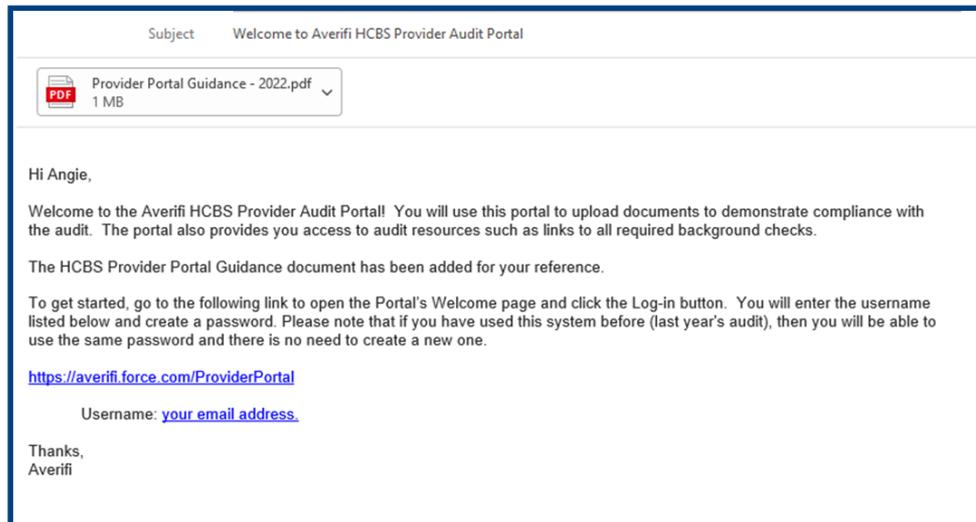
Provider Qualification Process – Step 5

- Provider completes the registration process
  - ▶ Provider clicks on link within email to take them to portal
  - ▶ Provider will need to log-in to create credentials
  - ▶ Username is the provider email address
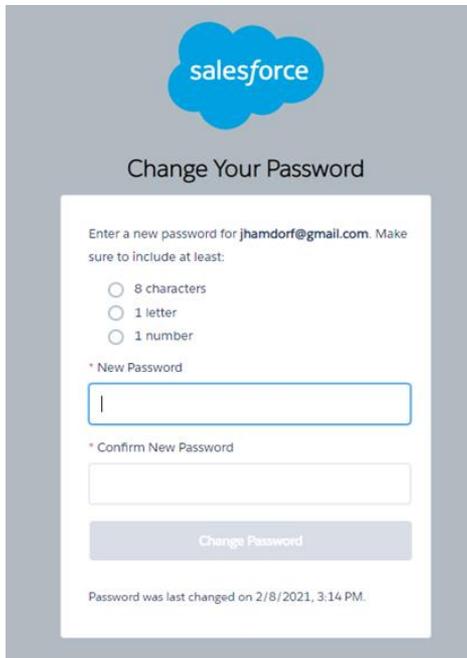
Note: When you log into the portal after the initial set up, your log in page will look different.
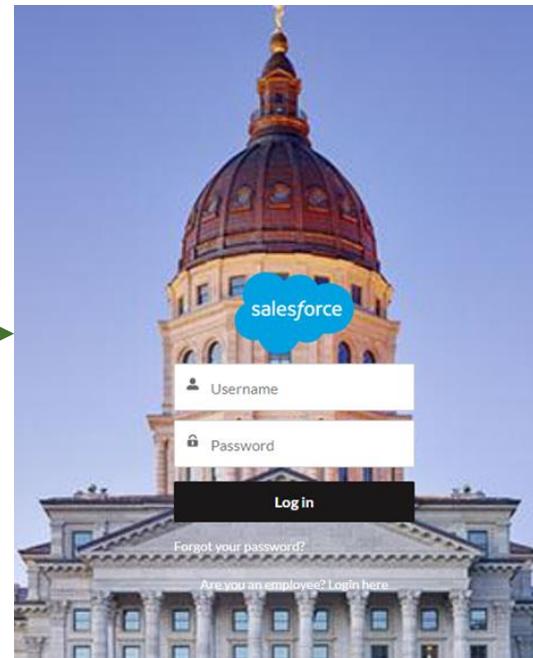
Helpful Hint: *To allow for the portal to work effectively, you will need to use Chrome or Firefox. Safari will cause an error*

- Provider prepares for Audit

  ‣ Once you have completed the registration process, the portal will open to the Home Page. Click on "My Account" to access the account(s) assigned to you for the HCBS Audit.

  ‣ Provider will need to click on the Audit name to move to the Audit page

Provider Qualification Process – Step 7

- Provider uploads and tracks required documents
  - ▶ Provider uploads acceptable documentation in appropriate folder to meet provider qualifications
  - ▶ Provider can also track status and verify which employee(s) and which documents are required for audit

- Completing the Process – HCBS Provider Acknowledgement
  - ▸ At the bottom of the Audit page on the portal, the provider will need to check the box to indicate they have completed uploading all required documents. This will notify Averifi to begin review of documentation. (click pencil icon to allow the box to be edited)
  - ▸ If the Provider is working outside the portal, Averifi will send the HCBS Provider Acknowledgement letter to the provider to be signed and sent back to the Averifi rep

When you have uploaded all required documents for Agency and Workers, please complete the below process by checking the acknowledgment box.
Once completed (box checked), a notice will be sent to Averifi to complete your audit.

Review Name
Test Review 1.19

Provider
Averifi

Acknowledgement
I acknowledge that all required documentation has been provided and is accurate. I give Averifi permission to start the Annual HCBS Provider Review.

I agree, Notify Averifi to Begin Audit
☑

Signing Authority
👤 mccoy2524

Pencil icon that will need to be clicked allow the provider to check the box to indicate they are ready for audit.

- Averifi conducts Audit
  - ▸ Averifi will review documents
  - ▸ Averifi will notify provider of missing documentation or if questions arise
  - ▸ Averifi will notify the provider when the audit is completed
    - ▪ If Audit passes, Averifi will send email notification of compliance and close the audit
    - ▪ If Audit fails, Averifi will send email notification of non-compliance and initiate a ReAudit
      - • The provider will be required to submit compliant documentation upon request
      - • The timeframe will be the same as the original audit. (30 days)
      - • The KanCare MCOs may require additional follow-up.
      - • A copy of the Provider's Background Check Policy will be required
    - ▪ Averifi will provide audit results to the MCOs

HCBS Background Check Policy

Recommended Key Components

- All required KDADS HCBS Background Checks will be processed on anyone employed or contracted to provide HCBS, paid or unpaid who received HCBS funding. Required background checks:

  - KDADS Criminal Record Check

  - DCF Adult Abuse Registry Check

  - DCF Child Abuse Registry Check

  - KDADS Nurse Aide Registry Check for ANE in an adult care home

  - Office of Inspector General Exclusions List Check

  - KDOR Motor Vehicle Screen Check (only if transport)

- All background checks will be processed and receive clear results prior to the individual providing HCBS.

- Subsequent background checks will be processed and receive clear results before the individual's two-year anniversary hire date. Biennial background checks must be done throughout the individual's employment.

- Individuals with adverse findings cannot provide HCBS. The individual cannot be hired to provide HCBS or if currently providing HCBS must be removed from providing services.

- Any individual providing HCBS must disclose all arrests to the provider. The provider will track the outcome and if convicted, conduct another KDADS criminal background check to verify if the conviction prohibits the individual from providing HCBS.

- Background check results will be retained during and after employment for the timeframe specified by provider's HR department and readily available for audit.

Qualifications

Waiver Provider Qualifications

- Averifi will conduct Audits based on all 7 waivers
  - ▶ AU – Autism
  - ▶ BI – Brain Injury
  - ▶ FE – Frail and Elderly
  - ▶ IDD – Intellectual Developmental Disability
  - ▶ PD – Physical Disability
  - ▶ SED – Severe Emotional Disturbance
  - ▶ TA – Technology Assisted

General Agency Requirements

- Agency requirements are by wavier and service(s)
  - ▸ All HCBS Providers must meet the 2 general agency qualifications or requirements
    - ▪ Current KMAP Enrollment
    - ▪ Contracted with one or more MCOs

  - ▸ AU, SED and IDD Waivers and Final Setting Rule providers have additional requirements
    - ▪ CMHC License (SED & AU waivers only)
    - ▪ CDDO Affiliation (IDD waiver only)
    - ▪ FSR Certificate (Final Setting Rule Providers only)

General Worker Requirements

- Worker requirements are by wavier and service(s)
  - HCBS Employees must meet the general worker qualifications regardless of waiver type
    - KDADS Criminal Record Check
    - DCF Adult Abuse Registry Check
    - DCF Child Abuse Registry Check
    - KDADS Nurse Aide Registry Check for ANE in an adult care home
    - Office of Inspector General Exclusions List Check
    - KDOR Motor Vehicle Screen Check (only if transport)

  - Important to Note
    - For documents to be valid, the name & date when the information was pulled will need to be visible and legible.
    - Each background check must be completed every two years from employee start date.

- The KDAD's Survey, Certification and Credentialing Commission is responsible for investigating allegations of abuse, neglect, exploitation, or failure to provide adequate care and services to residents in adult care homes licensed by KDADS. Investigations are done to determine compliance with federal and state regulations regarding the health, safety, and welfare of any resident of any licensed adult care home.

- All individuals who provide HCBS must be checked for a result.
  - Go to the Nurse Aide Registry (https://ksdadsprod.glsuite.us/glsuiteweb/clients/ksdads/public/main.html)
  - Click the third button titled "Non-Licensed/Non-Certified"
  - Enter the employee's information (DOB and SSN) and search.
  - The result should indicate "NO" under the Prohibition column.

HCBS Provider Portal

How to Upload Documents

1.   If you have multiple employees that will be audited, please click on the "Worker Documents" folder and create sub folders with your employee's name.

2.   On the Audit page, go to the Attachments section and click "Upload Files" or move the file over the "drop file" area and let the system capture it.

3.   Select the file, files or folder you want to upload and click "Open".
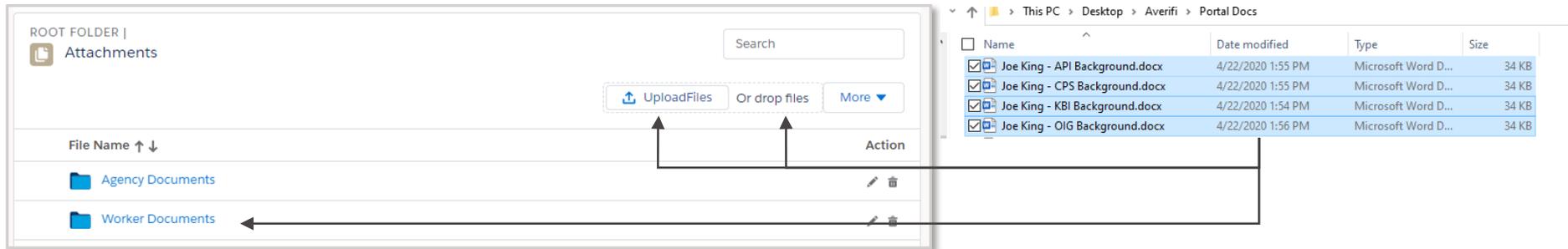
Helpful Hint: To allow for the portal to work effectively, you will need to use Chrome or Firefox. Safari will cause an error

Provider Portal – Home Page (Resources)

The **KDADS Notices** tab contains formal policy memos which have been issued and are related to the HCBS Provider Qualification Audit.
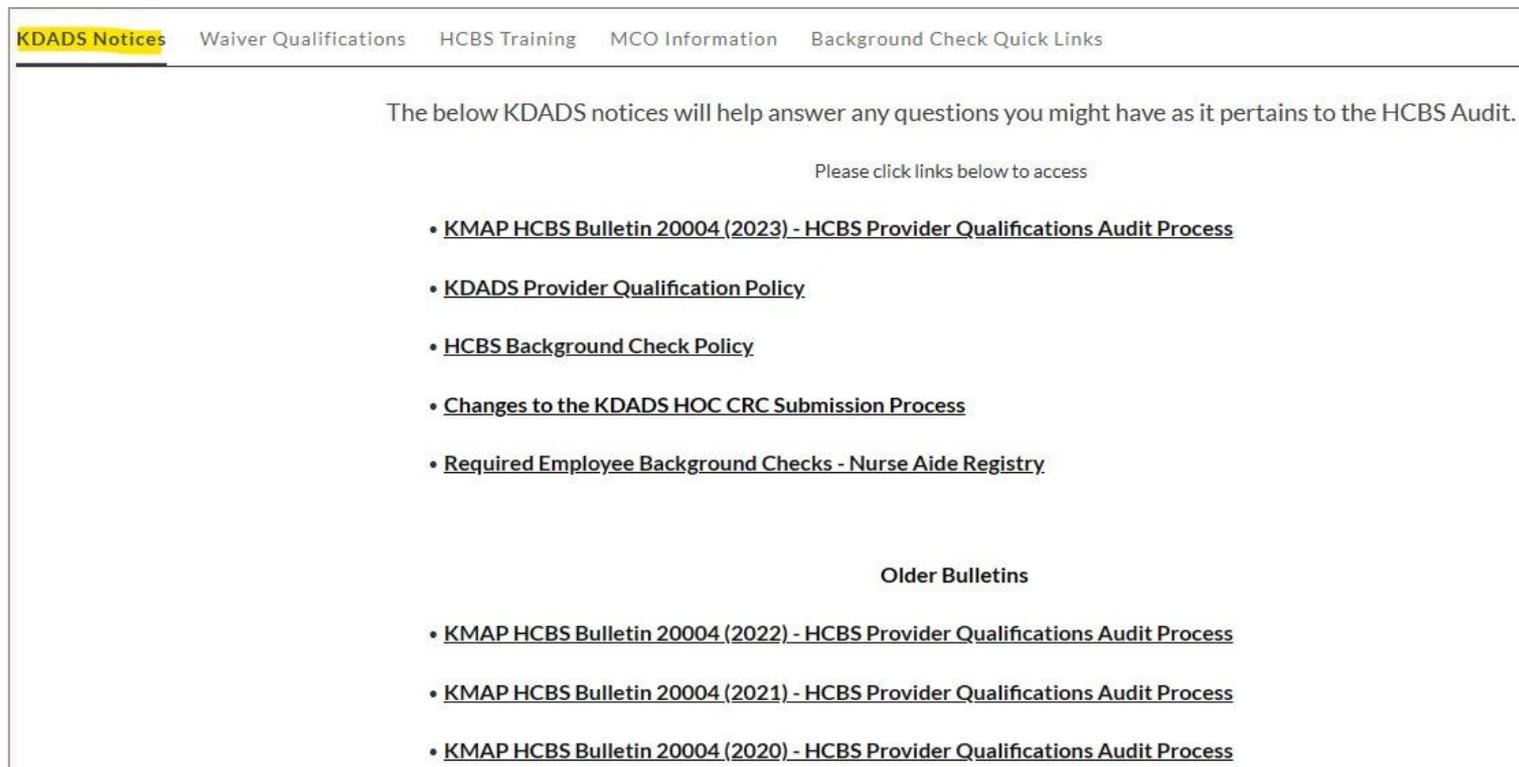
KDADS Notices   Waiver Qualifications   HCBS Training   MCO Information   Background Check Quick Links

The below KDADS notices will help answer any questions you might have as it pertains to the HCBS Audit.

Please click links below to access

- **KMAP HCBS Bulletin 20004 (2023) - HCBS Provider Qualifications Audit Process**
- **KDADS Provider Qualification Policy**
- **HCBS Background Check Policy**
- **Changes to the KDADS HOC CRC Submission Process**
- **Required Employee Background Checks - Nurse Aide Registry**

Older Bulletins

- **KMAP HCBS Bulletin 20004 (2022) - HCBS Provider Qualifications Audit Process**
- **KMAP HCBS Bulletin 20004 (2021) - HCBS Provider Qualifications Audit Process**
- **KMAP HCBS Bulletin 20004 (2020) - HCBS Provider Qualifications Audit Process**

Provider Portal – Home Page (Resources)

The Waiver Qualifications tab provides the qualifications or requirements for each waiver.

The HCBS Training tab has the most recent training on the HCBS Provider Qualification Audit.
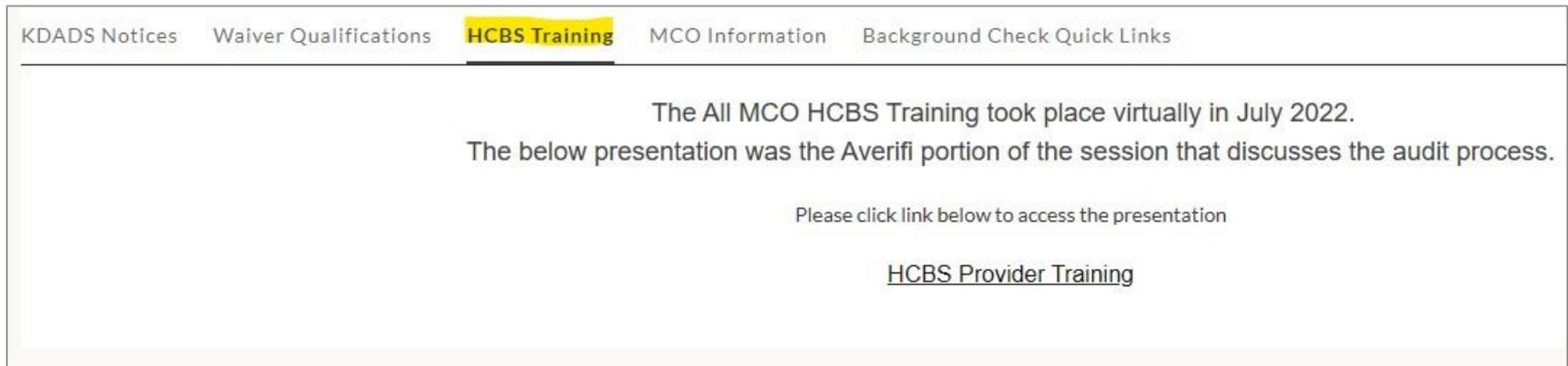
KDADS Notices	Waiver Qualifications	**HCBS Training**	MCO Information	Background Check Quick Links

The All MCO HCBS Training took place virtually in July 2022.
The below presentation was the Averifi portion of the session that discusses the audit process.

Please click link below to access the presentation

HCBS Provider Training

The MCO Information tab has your MCO advocate contact information.

KDADS Notices   Waiver Qualifications   HCBS Training   **MCO Information**   Background Check Quick Links

If you have questions regarding the HCBS Provider Qualification audit or HCBS in general,
the links below provide your MCO Advocate contact information based on your location.

Please click the MCO Icon to access the Advocate Map

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Provider Portal – Home Page (Resources)

The Background Check Quick Links tab provides direct links to required background checks.

KDADS Notices	Waiver Qualifications	HCBS Training	MCO Information	Background Check Quick Links

The below State links will give you access to all required Background Checks to be compliant with the HCBS Provider Audit.

Please click links below to access

Reference Guides

- HCBS Background Checks Reference Guide (Reference Guide for all Background checks)

- Nurse Aide Registry Instructions (Reference Guide to use for accessing the Nurse Aide Registry)

Background Check Quick Links

- KDADS Criminal Record Background Check

- DCF Adult Abuse Registry Check (APS)

- DCP Child Abuse Registry Check (CPS)

- KDADS Nurse Registry Check for ANE in an adult care home

- Office of Inspector General Exclusions List Check (OIG)

- KDOR Motor Vehicle Screen (only required if transport HCBS participants)

Thank you