AUDIENCE: Administrative Entities (AEs) and Providers of Consolidated and Person/Family Directed Support (P/FDS) Waiver services

PURPOSE: To announce the availability of the Provider Qualification Question and Answer document.

BACKGROUND AND DISCUSSION

ODP recently released Announcement #001-16 entitled, “ODP Provider Qualification Documentation Record and Webinar.” Two webinars were then conducted regarding ODP’s provider qualification process on January 28, 2016 and January 29, 2016. After the release of the announcement and webinars, ODP received many questions. These questions were reviewed and compiled into the attached Q & A document.

The ODP Provider Qualification Documentation Record is posted on ODP Consulting. If the spreadsheet needs to be unlocked, the password is “ProviderQual”.

Providers can access both the ODP Provider Qualification Documentation Record and the Provider Qualification Question and Answer documents at the following paths on ODP Consulting via the Provider Information Center (PIC):

ODP Provider Qualification Documentation Record
ODPConsulting.net > Provider Information Center > ODP Business Practice Information > Provider Qualification > Provider Qualification > ODP_Provider_Qualification_Documentation_Record_FY15-16.xlsx
Administrative Entities (AEs) can access the same documents at the following paths on the ODP Consulting Administrative Entity Information Center (AEIC):

ODP Provider Qualification Documentation Record
ODPConsulting.net > Administrative Entity Information Center > ODP Business Practice Information > AE Qualification of Providers > AE Qualification of Providers > ODP_Provider_Qualification_Documentation_Record_FY15-16.xlsx

Provider Qualification Question & Answer (Q & A)
ODPConsulting.net > Administrative Entity Information Center > ODP Business Practice Information > AE Qualification of Providers > AE Qualification of Providers > Provider Qualification Q & A

CONTACT:
Questions about the ODP Provider Qualification Documentation Record can be directed to ODP’s Provider Qualification mailbox at ra-odpproviderqualif@pa.gov
ODP issued Announcement # 001-16, entitled “Biennial Provider Qualifications” on January 7, 2016, which described requirements for ODP providers to collect, verify, and submit qualification supporting documentation to the Lead AE. ODP followed up this announcement with webinars on January 28 and 29, 2016, to describe these requirements and to demonstrate the functionality of an ODP-developed resource, a spreadsheet entitled, “ODP Provider Qualification Documentation Record.”

As a result of the announcement and webinars, ODP received questions from the field for clarification of ODP’s provider qualification requirements. This Question and Answer (Q & A) document summarizes and at times paraphrases those questions and includes ODP’s responses. If you have a question that is not addressed here, please forward it to:
ra-odpproviderqualif@pa.gov

Table of Contents

<table>
<thead>
<tr>
<th>Qualification Process</th>
<th>Q # 1 to 8</th>
</tr>
</thead>
<tbody>
<tr>
<td>Clearances</td>
<td>Q # 9 to 20</td>
</tr>
<tr>
<td>Documentation Record</td>
<td>Q # 21 to 41</td>
</tr>
<tr>
<td>Supporting Documentation</td>
<td>Q # 42 to 50</td>
</tr>
<tr>
<td>Automobile Qualification</td>
<td>Q # 51 to 55</td>
</tr>
<tr>
<td>Webinar</td>
<td>Q # 56 to 57</td>
</tr>
<tr>
<td>Miscellaneous</td>
<td>Q # 58 to 60</td>
</tr>
</tbody>
</table>

Qualification Process

1. How does a provider know when they are due to submit provider qualification?

   Please refer to ODP Announcement # 001-16, entitled, "Biennial Provider Qualifications."

2. Can you just clarify that this does not change the biennial process for provider qualifications in that if you are not having an on-site review of your PMT, you do not have to file for Provider Qualifications?

   To be clear If the provider is or is not scheduled for an On-Site Provider Monitoring that does not change the Provider Qualification (PQ) process. The provider will need to complete the PQ biennial application process as required. The timing for PQ renewal can be determined by viewing the PQ expiration date in HCSIS.
3. How do we apply this for temp staff/consultants?

Chapter 51.3 defines staff as employees, contractors or consultants. Chapter 51 requires providers of waiver services to meet all qualifications as specified in the P/FDS and Consolidated Waivers, Appendix C for each service being provided.

4. As a provider, we have "vendors" that, they themselves, provide services. Do we need to qualify that vendors’ staff? Note that we reimburse the vendors, they pay their staff.

Refer to ODP Information Memo 106-12, entitled, "Qualification of Vendors."

5. Our current qualifications are valid until 4/30/2017 – our MPI# ends in an even number. Does that mean that we do not have to submit a qualification application or supporting documentation this year? And if the answer is no, we do not, should we still fill out the spreadsheet or at least have all that information gathered in a binder on site?

If the expiration date of the application is 4/30/2017 and the provider's MPI # ends in an even number, the provider does not need to complete a biennial application for the Fy 15/16. The ODP Provider Qualification Documentation Record does not need to be submitted unless the provider is scheduled to complete the biennial application process. However, it is expected to maintain an updated ODP Provider Qualification Documentation Record or the provider's form that contains all the information requested in the spreadsheet.

6. Just for my reference (now and future), is the information being requested from the 2014-2015 fiscal year? The same time frame as the Provider Monitoring piece? Or does the Qualification application encompass a different time frame?

The timeframe for Provider Qualification is from the date of the initial or previous biennial qualification completion date in HCSIS.

7. So we have individuals that buy tokens for the bus and then we reimburse them, would we have to include them on the transportation service and send in supporting documentation?

For public transportation the answer is no. For other transportation types the answer would be much more involved, so email the provider qualification mailbox at ra-odpproviderqualif@pa.gov if you need further clarification.

8. Where is the ODP Provider Qualification Documentation Record to be sent?

Qualification documentation can be submitted via parcel post, electronically or may be hand-delivered to the Lead AE.
9. Is an FBI clearance always required for direct support staff who serve individuals under age 18?

Child Protective Services Law (CPSL) requires that all staff (employees and volunteers) having direct contact children obtain Pennsylvania State Police, FBI clearances, and Child Abuse clearances prior to employment and to update those clearances within 60 months. CPSL FBI clearances are obtained through the Department of Human Services (DHS).

10. Must staff who live in another state and work at a provider's site in PA get an FBI background check?

The Department of Aging (Aging) requires an FBI background check for prospective employees who are not and for the two years immediately preceding the date of application have not been a resident of PA. This would include employees who reside in another state but work in PA.

11. Is one FBI clearance sufficient or are there times when one staff will require two FBI checks - one through the Aging and one through DHS?

ODP adheres to the CPSL requirements for staff who serve individuals under age 18 and the Aging requirements for staff who serve individuals age 18 and above. DHS FBI clearances are based on the DHS prohibited offense list and Aging clearances are based on the Aging list. The two lists are not exactly the same. As such, an FBI clearance obtained through the Department of Aging cannot be used to obtain employment that requires an FBI check through the Department of Human Services, and vice versa. Therefore, staff who have not lived in PA for 2 years and who will work with both adults and children will need to have FBI clearances through both DHS and Aging. Also, providers who obtain FBI checks for their staff and hire staff that would require clearances through both DHS and Aging would need to register through both DHS and Aging.

12. What should a provider do if Cogent rejects their registration because the business structure does not fit into any of the Cogent facility/agency categories?

Providers who must obtain clearances but cannot register for Cogent must require their prospective employees to submit for their own clearances.

13. As a provider, we have staff who work with school age people (under 21). The school district takes only the Department of Human Services clearance, not the Department of Aging one. Would we just put that in a note section or would we have to do both?

If you are providing a service that is being paid through an entity other ODP and is not being paid through ODP's waivers, you do not need to include supporting documentation for that service as part of your ODP provider qualification application. You only need to provide documentation to support that staff meet ODP's waiver requirements.
14. **What are the requirements for renewing clearances?**

Staff who only serve individuals age 18 and above do not need to have their clearances renewed. Staff who serve individuals below age 18 are required to renew all of their clearances within 60 months.

15. **If staff do the clearances online, there is not a way to print the application itself. Is a receipt ok?**

After the background clearances have been completed, the results of the clearances will be available for printing. A receipt by itself is not sufficient. In order to hire staff who do not have completed clearances, you must follow provisional hiring regulations as outlined in 55 Pa Code § 51.22. In accordance with § 51.22 (a) (1), provisionally hired staff must give the provider a copy of the completed criminal history request form and child abuse clearance form.

16. **If a staff’s background check was completed more than one year before hire, is it possible that the staff would be considered unqualified and services that this staff provided would need to be paid back, all the way back to when he was hired?**

In accordance with 55 Pa Code, providers must be qualified prior to rendering waiver services (§ 51.11 (c)) and will not be paid unless they are qualified (§ 51.11 (g) and § 51.13 (s)). The Department may terminate a provider agreement and initiate sanctions against a provider who is not in compliance with 55 Pa Code, as per § 51.152 and 153. A sanction could include recoupment of funds for services provided by unqualified staff.

17. **Has the current criminal clearance requirement been lifted for Pre-vocational 2390 employees, or are we still requiring them as qualification documentation?**

Providers are required to complete the Provider Qualification Documentation record for all employees, including staff who provide 2390 services, and to submit hard copy documentation for the last 25 employees, including staff who provide 2390 pre-vocational services.

18. **If someone has a prohibitive offense they would not be hired and therefore not be on the spreadsheet correct?**

Provider qualification is a point-in-time process. Providers should ensure that all current direct support staff are listed on the Provider Qualification Documentation Record. Staff who are no longer employed are not required to be included on this list.

19. **Since background checks for staff who serve individuals under age 18 are now good for 60 months, can a person be hired with a background check previously acquired for a different employer, as long as it’s within the 60 month period?**

In accordance with 55 Pa Code § 3490.122 (e): “An administrator, or other person responsible for hiring decisions, may not hire or contract with an applicant, nor may a prospective operator be issued a certificate of compliance or registration if the applicant’s report of criminal history record verification or the report of child abuse record information was obtained more than 1 year prior to the date of application.”
20. **May a provider require all staff to be FBI fingerprinted even if the staff was a PA resident for 2 consecutive years?**

Providers have the option to develop and implement hiring policies that extend beyond ODP qualification requirements.

<table>
<thead>
<tr>
<th><strong>Documentation Record</strong></th>
</tr>
</thead>
</table>

21. **Does a provider document anywhere on the ODP Provider Qualification Documentation Record information in regards to the CPLS requirement to update clearances within 60 months?**

Providers need to ensure that required clearances are renewed in accordance with CPSL and should update the ODP Provider Qualification Documentation Record accordingly. As clearances are renewed, providers should enter date and status of renewed clearance in the comment section of the spreadsheet and note that the clearances were renewed in accordance with CPSL, as applicable.

22. **Will the Provider Qualification Documentation Record be sent to us populated with any material or will we need to manually load all information?**

Providers need to enter their own relevant information. The Provider Qualification Documentation Record will calculate information that is dependent upon data entered by a provider in previous cells.

23. **In the staff training section, what do you include? Do you list the date of training and topic or yes/no that training occurred?**

Enter the training records, topics, and dates of training for behavioral support & supports broker services only.

24. **Which staff should be included on the spreadsheet?**

Providers should submit a list that includes all of their direct support staff, whether they provide licensed or unlicensed services. In regards to staff who provide services to individuals over age 18, include employees, contractors or consultants that provide a waiver service through direct contact with a participant, or who are responsible for the provision of a waiver service. In regards to staff who serve individuals under age 18, include employees who have direct contact with children because they provide care, supervision, guidance or control of children or have routine interaction with children.

25. **For which group of staff are providers required to supply supporting documentation?**

As part of the initial and biennial qualification process, all providers of unlicensed services are required to submit copies of qualification supporting documentation for the most recent 25 direct support staff who provide unlicensed services only and who were hired since the most recent qualification date in HCSIS to the Lead AE. Providers who hired less than 25 direct support staff must submit documentation for all staff who provide unlicensed services only and who were hired since the most recent qualification date, up to a maximum of 25 staff.
26. How can a provider obtain the ODP Provider Qualification Documentation Record?

The ODP Provider Qualification Documentation Record can be accessed and downloaded from the Provider Qualification section of the Provider Information Center (PIC) via the following link:

27. Will ODP make the ODP Provider Qualification Documentation Record mandatory for providers?

It’s clear a lot of good work went into this task and it seems a shame that many providers likely won’t use it if they don’t have to.

ODP hopes to make the ODP Provider Qualification Documentation Record mandatory by adding it to the waivers. At this point in time, ODP hopes that most if not all providers will choose to use this spreadsheet, but providers are allowed to use their own form as long as it contains all of the qualification elements requested in this spreadsheet.

28. If one staff member provides multiple service codes, how is that reflected on the spreadsheet?

For staff who provide multiple services, enter ONLY the staff member's name, the additional service, and specialized qualification documentation or practicing certificate, as applicable, in a new row.

29. Using this format for a large number of staff may be a little prohibitive, as opposed to using alternate formats derived through organizational development. For a small provider it might be feasible to do it on an ongoing basis. But for a large agency that did not track things this way historically, it would be quite challenging.

Information requested on this spreadsheet is listed as provider qualification criteria in Appendix C of the waivers. Providers should be tracking their staff's qualification information to ensure that they maintain ODP’s qualification requirements. Note that this form itself is not a requirement; providers may use their own form as long as it contains all of the qualification elements requested in this spreadsheet.

30. How can the spreadsheet be manipulated to accommodate more lines and additional information or to delete unnecessary lines?

A new spreadsheet has been posted to the PIC that includes additional lines. The Staff Qualification worksheet is locked with a password in order to protect the formulas. If anyone has a need to unlock the worksheet, the password is “ProviderQual”. When the sheet is unprotected, please be careful and avoid any activities that prevent the formulas from working correctly.

31. Currently I try to keep this report up to date during the year. So for the Staff Person Validating Documentation box, should I put the end date before AE reviews?

You would include the most recent date that you validated documentation prior to submitting the spreadsheet to the AE for qualification.
32. I am currently reviewing PQ for a provider and they have specialty code 036 - respite care listed. I am looking for that code on the new ODP PQ Doc for 15/16 under Documentation Requirements tab and cannot locate it. Can you advise how to proceed?

Respite care, specialty code 036, is a base-funded service. Base-funded services are not required to be qualified and should be marked as "Not Qualified" on the application.

33. Supports Coordination is not an option for Services?

This process does not apply to Supports Coordination Organizations.

34. When is the ODP Provider Qualification Documentation Record being implemented?

Beginning February 1, 2016, to coincide with the Fiscal Year 15/16 biennial provider qualification process, ODP providers must submit the required qualification information and supporting documentation to the Lead AE as part of the initial and biennial qualification processes.

35. For behavioral support services the service may be provided under the supervision of a master's level staff. If we put in the staff's name and they do not have a master's degree it will show an error - what do we do in this situation?

The spreadsheet will not show an error. However, you should submit documentation, such as a table of organization, to the Lead AE that demonstrates how staff without master's degrees are being supervised by master's level staff.

36. None of my staff work with children. Can I cut and paste the answer "No" OR must I go line by line?

You can cut and paste the answer.

37. Can you explain the corrective action section again and why we would need to put something there?

If there were any problems with the staff documentation that you in turn corrected, you would choose the corrective action that you implemented from the drop-down list.

38. Where do we list information on drivers who provide transportation mile?

Providers are to submit a list to support that all of their direct staff who provide waiver services meet ODP provider qualification requirements, including staff who provide transportation mile. If using the ODP Provider Qualification Record, you would list the staff on the "Staff Qualification" worksheet, utilizing the "Documentation Requirements" worksheet as a guide.

39. Our provider number is the nine digit number we use, correct? We do not add the four digit service location on the end of it do we?

Correct. You should enter your MPI# on the spreadsheet. You do not need to include the service location code.
40. If an employee has a clearance date after a hire date, but did not work by them self with a consumer until on or after the clearance date, should that just be noted in the comments box?

You should provide a justification or explanation in the comments box for any issues that may be questionable on your spreadsheet.

41. When an employee is hired and added to this spreadsheet, they may have a valid driver’s license. As time goes by and the driver’s license expires, will it turn red on the spreadsheet?

The calculations for the expiration date are designed to turn red based upon the date that the spreadsheet is opened, so the expiration date should turn red after the license expires.

42. Are providers required to send in proof of training and proof of years of experience for new Behavior Supports staff? Like a resume and training sign in sheet?

Providers are required to send in qualification documentation for up to the last 25 staff delivering behavioral supports services that were hired since the last initial or biennial qualification completion date indicated in HCSIS. Documentation to be submitted for training requirements: A copy of the training curriculum that includes the identified topic areas, the date the training was provided, the name and contact information of the trainer, the trainer’s credentials, and a signature from the person trained attesting that (s)he attended the training. Documentation to be submitted for years of experience: A resume listing the name, address, and contact information for the place(s) worked, and a description of duties that clearly reflect the above. This information can also be found in the Instructions tab of the ODP Provider Qualification Documentation Record.

43. Is the AE required to maintain the documents that they validate for the 25 staff? Or just do an on-site review of that info?

AEs need to review the documentation and mark the spreadsheet as validated for the last 25 unlicensed staff hired since the last initial or biennial qualification date. AEs need to maintain a copy of the spreadsheet with their validating initials. AEs are not required to collect and maintain the documentation that they review.

44. Is supporting documentation required for ALL staff members under licensed 6400? This is to be used for only the last 25 hired staff in UNLICENSED programs?

All providers, including licensed and unlicensed providers, must maintain the spreadsheet on an ongoing basis for all staff providing waiver services and submit the spreadsheet to their Lead AE when their qualifications are due. However, providers of licensed 6400 residential services do not have to submit the supporting documents to the Lead AE with the spreadsheet at the time of their qualification.
45. **What is the timeframe to determine the "25 most recent hires"?**

The timeframe to determine the "25 most recent hires" is specified in the instruction sheet. This timeframe is from the date of the previous initial or biennial qualification completion date in HCSIS.

46. **If a provider is providing behavioral support services, but the last 25 employees aren't providing one of those services, do we still need to send documentation and information on staff that does, since we are providing that service?**

Providers are required to send in qualification documentation for up to the last 25 staff delivering unlicensed services that were hired since the last initial or bi-ennial qualification completion date indicated in HCSIS. If the staff providing behavioral supports are not among the last 25 staff hired who deliver unlicensed services, you do not need to include their supporting documentation.

47. **How are the supporting documents to be submitted: hard copy vis USPS or electronic via e-mail? When submitting the document to the AE, does physical documentation need to be provided to the AE or just an email copy?**

The provider may submit the supporting documents through electronic email, USPS or hand delivery.

48. **We have staff that were hired more than 3 years ago and still qualify as the most recent 25 hired. Are we submitting their first clearance or the most current?**

Providers are required to send in qualification documentation for up to the last 25 staff delivering unlicensed services that were hired since the last initial or bi-ennial qualification completion date indicated in HCSIS. The clearances obtained prior to hire should be submitted as well as the most recent clearances. Date and status of renewed clearances should be entered in the comments section of the spreadsheet.

49. **Even though we are completing the spreadsheet with all current Direct Support Professionals, would we only need to supply copies of the licenses and clearances for those hired since the last time we submitted them?**

Providers are not required to submit copies of worker's or agency automobile qualification supporting documentation such as driver's licenses, insurance, registration, etc. However, this automobile qualification information must be maintained ongoing on the spreadsheet. Documentation of clearances must be submitted to the Lead AE at the time of qualification for the last 25 staff hired since the previous qualification date.

50. **Where are the training and experience qualifications for behavioral support coming from - these are not in the service definition.**

Qualification requirements for all services are listed under the P/FDS and Consolidated Waivers, Appendix C.
51. Is there a quick and easy solution of exporting the vehicle information into the new Excel spreadsheet?

If you wish to export the agency vehicle information from last year's ODP Qualification Documentation Record, you can copy and paste Columns A through F from last year's Automobile Qualification tab to this year's Automobile Qualification tab. If you are trying to export information from another source, you should contact your technical support staff, if available, or search the internet.

52. Can you explain what automobile qualification information is required? Do we have to submit documentation to support qualifying the staff vehicle?

We need vehicle information for all vehicles that transport individuals receiving service, whether it's an agency vehicle or staff personal vehicle. We need driver's license information for all staff who transport individuals regardless if they use the agency vehicle or their own personal vehicle. Providers are not required to submit hard copies of driver's licenses, registration cards, or automobile insurance cards.

53. What do you do for automobile information for staff using their own cars as it changes from year to year?

The provider should keep on file the current auto information for all vehicles transporting individuals receiving service, including staff personal vehicles. Staff should be informed that if their auto information changes (new car, new registration, new inspection) they should supply the new information to the agency. In addition, the agency should keep track of expiration dates so that they can be alerted when a registration or inspection is due to expire and ensure that they get updated information.

54. Are we no longer required to validate current inspections for staff vehicles? Yes, you are if the staff uses their vehicle to transport individuals receiving service.

This is not a requirement in the waivers and therefore not listed on the spreadsheet. However, you may consider making this an agency policy for safety and legal purposes.

55. The instructions for Columns AW through BB state: "Enter current license, registration & auto insurance for all staff vehicles if used to provide service...Providers are not required to submit staff vehicle information to the Lead AE for qualification." This seems contradictory. Are we to provide this information or not?

It is required for you to gather this information from your staff and list all of the information on a list (the spreadsheet can be used as the list). The list must be submitted to the AE, but NOT the actual documentation such as copies of registrations and inspections.
56. Will this webinar be available again for review? Will this webinar be available for future viewing on the PIC?

Yes, it will be available on the Provider Information Center (PIC).

57. How will new providers get this information. Where will it be posted?

New providers will receive this information during ODP new provider orientation training. We also expect the Administrative Entity to work with new providers on the Provider Qualification process.

58. I find most of these bulletins very confusing in determining which programs/providers is being discussed, Is there a central location that explains who is affected with each bulletin?

Each program office has their bulletins listed on the DHS website. The bulletin will tell you who is affected by the bulletin. ODP uses the Provider Information Center to post the most recent information on Provider Qualifications.

59. Is there any relationship between qualification and revalidation?

The provider must be qualified to be revalidated. Otherwise, the qualification date and revalidation date are two separate dates.

60. What is the address for the provider qualification mailbox?

If you have any further questions, email the provider qualification mailbox at: ra-odpproviderqualif@pa.gov