HCBS Final Rule Stakeholder Call

3/17/2021

Noon call (75 participants on the line)

1) **Question/Comment:** I am working as a new administrator. Is there only one log-in credential allowed per provider?

KDADS: In order to log into the Community Connections portal there is only one log-in allowed. More than one staff person can use the same log-in at the same time, but don't work on the same thing or overwrite each other's work.

2) **Question/Comment:** Do we need to submit policies for each site that was flagged or if you will be able to know that evidence for one site goes to all of the other sites?

KDADS: You will have to submit evidence for every assessment. You can upload the same policy to those questions if the policy is the same at those settings.

3) **Question/Comment:** If I have five policies that answer all questions can I just submit a form that includes all of those for each question?

KDADS: We will review what you submit. We will look through and try to find the evidence for the question.

4) **Question/Comment:** Photographic evidence is not being accepted, just policies correct?

KDADS: Yes, as primary evidence we found that photographs cannot show easily that we meet compliance but they can make great supporting evidence. We do not necessarily need them, if you feel it strengthens your policy you can add it but we do not need it.

WSU: For C1 and C2 photos are still accepted as primary evidence to show that the setting is not located inside of, on the grounds of, or adjacent to an institution.

5) **Question/Comment:** We have not seen a lot of restrictions go through behavior management committees or behavior support plans. Do you know anything about that?

KDAS: Any restrictions should be included in the person centered serviced plans and behavior support plans. Restrictions related to this will be at the support plan level.

6) **Question/Comment:** We have a couple of new sites that I need to add and I am not able to add them.

KDADS: You can add those if you go to the communityconnectionsks.org website home page if you scroll towards the bottom there should be a heading that says need to notify KDADS of a new site and there should be a box to click that takes you to a form you need to fill out. If you are still having issues with that go to the chat on that website and they should be able to help you with that.

7) **Question/Comment:** I have a question regarding C3. Do you want better photos showing the whole community?

KDADS: That should work. Once we get to remediation the intent of the question has been more to align with whether the home is isolating. We would prefer a policy if possible. C4 and C5 kind of hit that same concept.

8) **Question/Comment:** Some of the issues I have been running into are questions about is this location accessible or keys, etc. Do we have to state how individuals not living in the home would access it?

KDADS: C3 is one of those questions that can go either way. If you have a gated community the next step would be a policy stating that persons-served are not isolated. Other items are best supported using policies and procedures. Photos of a locked door don't always show that the person served have access but if you have a policy stating that persons served have access to door locks and can use them it is easier to state in a policy. You can provide policy about how individuals who work or do not live there must knock, notify them, etc.

Evening call (2 participants)

1) **Question/Comment:** I submitted one of my residential settings for heightened scrutiny and haven't heard back so I don't know what to do. Also do I need to resubmit every time I get a new client or can I submit once and be done?

KDADS: I am going to give you my direct email, send me an email with your provider name and contact info so I can look into that and see what is going on. My email is Russell.Bowles@ks.gov For a new site you will need to go to the community connections home page and scroll down to where it says open new site and there should be a yellowing button that you can click that will take you to a form to complete for those new settings and those will be incorporated for the ongoing monitoring process.