



The 2024 annual HCBS Provider Qualification Audits for FMS Providers will begin in May. The audits had been placed on hold to provide responses to the questions FMS Providers had asked of KDADS and the MCOs.

The responses to the FMS Provider questions and audit guidance is as follows:

1. Will FMS providers be required to provide the same documentation on an annual basis that is required for initial approval of becoming an FMS provider? This documentation includes the following:
 - a. FMS Policy and Procedure Manual
 - b. KDADS FMS Agreement (this no longer exists)
 - c. Proof of Insurance (Liability, Worker's Compensation and Unemployment)
 - d. Registration and Good Standing with the Secretary of State's office
 - e. Tracking of worker's wages with each participant
 - f. W-9 Form

Response: This documentation will not be required for the 2024 HCBS Provider Qualification Audit. However, KDADS and the MCOs will collaboratively work with FMS providers to determine the requirements for future annual audits.

2. Will FMS provider continue to be required to submit their independent GAAP audit?

Response: Yes, FMS provider will need to continue to submit this to Averifi when the independent audit has been completed. Averifi will then send it to each MCO with which the provider is contract.

3. Will FMS providers be required to provide proof that each direct care worker has completed the required training for PCS services, as identified within each HCBS waiver?

Response: Through self-direction the member, and their designated representative or legal representative, when applicable, are required to provide training to the direct care workers they employ. For the audit, the FMS provider will be required to provide documentation that they educated the member and their designated/legal representatives of this responsibility for self-direction. The document provided needs to be signed by the member, and their designated/legal representative when applicable. The type of document may vary by FMS provider and can include: a FMS service enrollment form, a service agreement, or other document the provider gives to the member and their designated/legal representative that includes this information. If the member and their designated/legal representative did not



sign the document at the time it was provided, the FMS provider may include an attestation form that they have signed indicating they received and understand it.

To clarify the signature requirements, if the member is an adult and has a designated representative or legal guardian who assists them with self-direction, both need to sign the document provided. If the member is a minor child, then only the legal representative (parent/guardian) needs to sign.

4. For the requirement of a high school diploma or GED for PCS workers, what alternatives can a FMS provider use to verify when the worker no longer has a copy of his/her diploma/certificate? Can FMS providers have the PCS worker sign an attestation?

Response: The PD, FE, BI and TA waivers require that the PCS worker be age 18 or have a high school diploma or GED. Proof of either is sufficient. For proof of high school or GED completion, an attestation will be accepted for the 2024 audit year.

5. Regarding the questions about PCS, and where KDADS/State-approved training is a requirement, the MCOs will collect the provider's training curriculum for agency-directed services. For members who self-direct, KDADS and the MCOs would like to have examples of tools most commonly provided to members for training their employees. State-approved training will not be required for the 2024 audit year. However, KDADS and the MCOs will review the training curriculum examples and tools and determine requirements for the 2025 audit year.