Name:

Agency:

When answering each of the questions, please include a reasoning for your response. How will implementing these types of changes could positively or negatively impact your agency, the individuals you serve, and your current DSP workforce?

1. What are the benefits and consequences of implementing standard federal requirements for personal care workers in agency-directed and/or self-directed models of care?
2. What would standardized qualifications look like in terms of the following:

++ Educational requirements

++ Minimum age requirements

++ Screening requirements

1. Should standardization include the expectation that certain circumstances require more than the standard, or different standards?
2. What role could state-administered home care worker registries play in facilitating access to HCBS? What issues should be addressed in the creation of home care worker registries?
3. What issues should be considered in requiring criminal background checks? In the states that are utilizing fingerprinting and background checks already, what lessons can be learned from implementation and experience with these approaches?
4. What role can home care worker organizations play in providing training to support implementation of federal qualification standards? What regulatory or policy provisions would either support, or inadvertently disadvantage, home care worker organizations?
5. Should states be required to enroll or register all PCS attendants and assign them unique numbers for purposes of tracking claims?
6. What is the feasibility for state Medicaid programs of including home care worker identity on claims submitted for Medicaid reimbursement?
7. What other program integrity safeguards should be put in place, either as an alternative to, or in addition to, the controls recommended by OIG, for agency-directed PCS? For self-directed PCS?
8. Are the program integrity safeguards that are appropriate for agency-directed personal care services also appropriate for self-directed personal care services?
9. How can program integrity safeguards be developed and implemented to support key HCBS programmatic objectives such as choice and self-direction?