



Missouri Department of Health and Senior Services

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MEMORANDUM FOR ALL HOME AND COMMUNITY BASED SERVICES PROVIDERS

FROM: Jessica Bax, Bureau Chief
Bureau of Long Term Services and Supports

Subject: Employee Disqualification List (EDL) and Family Care Safety Registry (FCSR) Checks

This memo provides clarification regarding when and how often Home and Community Based Services (HCBS) providers are required to check the Employee Disqualification List (EDL) and Family Care Safety Registry (FCSR).

In-Home Services (IHS)

IHS providers shall check the FCSR prior to participant contact for employees, and must obtain a Good Cause Waiver when appropriate. As a reminder, conditional employment once the Good Cause Waiver has been submitted is allowable in the IHS program. Although the state regulations do not specify how often a provider is to check the EDL or FCSR once an employee is hired, DHSS recommends the providers verify each employee with the FCSR annually. IHS providers are not required to check the FCSR quarterly.

Consumer Directed Services (CDS)

CDS vendors shall check the FCSR prior to employment for prospective attendants, and must obtain a Good Cause Waiver when appropriate. As a reminder, conditional employment is not allowable in the CDS program. The CDS attendant may not work until the good Cause Waiver has been obtained. Although the state regulations do not specify how often a vendor is to check the EDL or FCSR once an attendant is hired, DHSS recommends the vendor verify each attendant with the FCSR annually. CDS vendors are not required to check the FCSR quarterly.

Residential Care Facility I/II (RCF) Personal Care (PC) and Assisted Living Facility (ALF) PC

RCF/ALF – PC providers shall check the FCSR prior to participant contact for employees, and must obtain a Good Cause Waiver when appropriate. Although the state regulations do not specify how often a facility is to check the EDL or FCSR once an employee is hired, DHSS recommends the providers verify each employee with the FCSR annually to ensure they are not on the EDL. RCF/ALF - PC providers are not required to check the FCSR quarterly.

Adult Day Care (ADC)

ADC providers shall check the FCSR prior to employees having any contact with a participant. The ADC provider shall, in accordance with 19 CSR 30-90.040 (10) check the FCSR at least every ninety (90) days to ensure current employees, contractors or volunteers are not on the EDL.

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Any questions regarding this memorandum should be directed to the Bureau of Long Term Services and Supports at LTSS@health.mo.gov or 573/526-8557.

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