

## Comment Log

West Virginia Aged and Disabled Waiver Application

Public Comment Period: July 12, 2023 to August 12, 2023

Comment Number	Date Received	Comment	Action
1.	7/12/23	Why is a 100% review being done? It is rare that all of a population needs to be reviewed in order to determine compliance, positive/negative trends, and/or deficiencies. Determine the confidence level you desire and pull a sample accordingly.	<b><u>No Change</u></b> : The requirement for 100% of staff qualifications to be verified was not changed in this amendment. This requirement has been in place for many years to ensure that all staff meet required qualifications.
2.	08/08/23	This agency agrees with the addition of Adult Medical Day Care. This service will not only be beneficial to ADW members, but their caregivers as well. However, DRWV is concerned about "... The licensee shall establish regular hours of operation of not less than four (4) hours per day for half day of service provision and not less than seven (7) hours per day for full day of service provision." <b>(Appendix C: Participant Services. C-1/C-3: Provider Specifications for Service/Adult Medical Day Care)</b> According to the Bureau of Labor Statistics, the average hours employed people spent working in 2022 is eight (8) hours. It is this agency's position that not less than seven (7) hours for a full day is insufficient.	<b><u>No Change</u></b> : The specification of "not less than seven (7) hours" means that a minimum of 7 hours of service must be provided in order to bill the full-day rate. The provider's hours of operation may be eight (8) or more hours per day.
3.	08/08/23	This agency agrees with the addition of pest eradication services.	<b><u>No Change</u></b>

4	08/08/23	This agency agrees with allowing LPNs to be qualified personal attendant staff. This may assist in decreasing the personal attendant worker shortage.	<b><u>No Change</u></b>
5	08/08/23	On page 141 Disability Rights of WV (DRWV) is acknowledged as the state's designated protection and advocacy agency. The following sentence lists other non-state agency resources. This language could suggest that DRWV is a state agency.	<b><u>Change:</u></b> This was not one of the amended items but BMS agrees that the language was confusing and it has been updated.
6	08/08/23	This agency recommends the reference to "(per established policies and procedures)" be clarified. This agency questions if this is a reference for when a member has an involuntarily closure by the ADW provider and/or the ADW program/WVDHHR BMS? <b>(Appendix F-1: Opportunity to Request a Fair Hearing, page 147, number 5)</b>	<b><u>Change:</u></b> The word involuntarily was added to the sentence to clarify the type of closure.
7	08/08/23	There is conflicting language regarding the Case Manager's responsibilities as it relates to home visits and meetings (quarterly, six-month, face to face, and monthly calls). This agency recommends the language in the application be clarified. <b>(See pages 113 and 117 of the application)</b>	<b><u>Change:</u></b> Changes were made to clarify requirements for quarterly home visits, monthly contacts, and annual and six-month face-to-face meetings for Service Plan updates.