



Missouri Department of Health and Senior Services

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MEMORANDUM FOR HOME AND COMMUNITY BASED SERVICES STAFF AND STAKEHOLDERS

FROM: Jessica Schaefer, Assistant HCBS Section Administrator
Section for Home and Community Based Services

A handwritten signature in cursive script, appearing to read "Jessica Schaefer".

SUBJECT: Family Care Safety Registry Checks Required During Declared COVID Health Emergency

This memorandum is to provide clarification to the COVID-19 flexibility regarding Family Care Safety Registry (FCSR) checks. Missouri Medicaid Audit and Compliance (MMAC) has been made aware that some HCBS providers have not been conducting FCSR checks on personal care aides/attendants, under a mistaken assumption it was not required during the declared COVID-19 health emergency. In March 2020 the following guidance was released on the [COVID-19 HCBS Provider Information](#) webpage:

"Family Care Safety Registry (FCSR)

The state will waive the requirement for the FCSR background check to be returned prior to the start of the individual providing care as it is anticipated there may be a delay in background check processing. The provider shall file the FCSR request prior to the aide providing care, and the aide/attendant may begin providing care immediately. If a potential aide/attendant requires a Good Cause Waiver, the state will waive the requirement for the waiver to be returned prior to the individual providing care. Providers shall only make this exception for crimes that are typically waived with the Good Cause Waiver."

HCBS providers are still required to file the background checks prior to employment, however the personal care aide/attendant may begin working while the agency awaits the processing of the background check.

The [COVID-19 Flexibility Authority Chart](#) has been further updated to further reiterate this requirement.

HCBS providers that have not conducted FCSR checks on personal care aides/attendants that were hired since the beginning of the COVID-19 health emergency should do so immediately. HCBS providers with questions may contact LTSS@health.mo.gov or MMACProviderReview@dss.mo.gov.

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