

HCBS Incident Management Survey  
CMS-10692, OMB 0938-New

**Response to Public Comments**

Comment: The Centers for Medicare and Medicaid Services (CMS) received one comment in response to the public comment request for the Home and Community Based (HCBS) Incident Management Survey posted to the Federal Register on December 14, 2018. The comment was from an advocacy group called LeadingAge expressing their support for the survey and sharing recommendations for CMS. First, they encouraged CMS to incorporate the perspective of HCBS providers in their incident management oversight activities. Second, LeadingAge recommended that CMS encourage states to develop robust and systematic incident information sharing processes with providers. Finally, LeadingAge recommended that CMS consider that they expand the scope of the survey beyond 1915(c) waivers (e.g., survey managed care organizations that provide HCBS) and that they survey states periodically rather than on a one-time basis to assess whether states have applied technical assistance from CMS. LeadingAge did not have any suggested revisions for the survey itself.

CMS Response: Providers are valuable partners in states' incident management processes and are critical to incident prevention efforts. CMS understands that providers must be consistently engaged and informed in order for incident management systems to function effectively. To that end, CMS supports the recommendations highlighted in the January 17, 2018 report titled "Ensuring Beneficiary Health and Safety in Group Homes Through State Implementation of Comprehensive Compliance Oversight"<sup>1</sup> which identifies providers as key participants in the incident management and investigation process and advises states to disseminate investigation findings and conclusions to relevant service providers. CMS anticipates reporting on any promising practices related to information sharing as identified by states in their survey responses.

Action(s) Taken: CMS greatly appreciates this feedback and will consider the recommendations provided by LeadingAge as it furthers its incident management technical assistance activities.

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<sup>1</sup>The Joint Report is available at the following url: <https://oig.hhs.gov/reports-and-publications/featured-topics/group-homes/group-homes-joint-report.pdf>