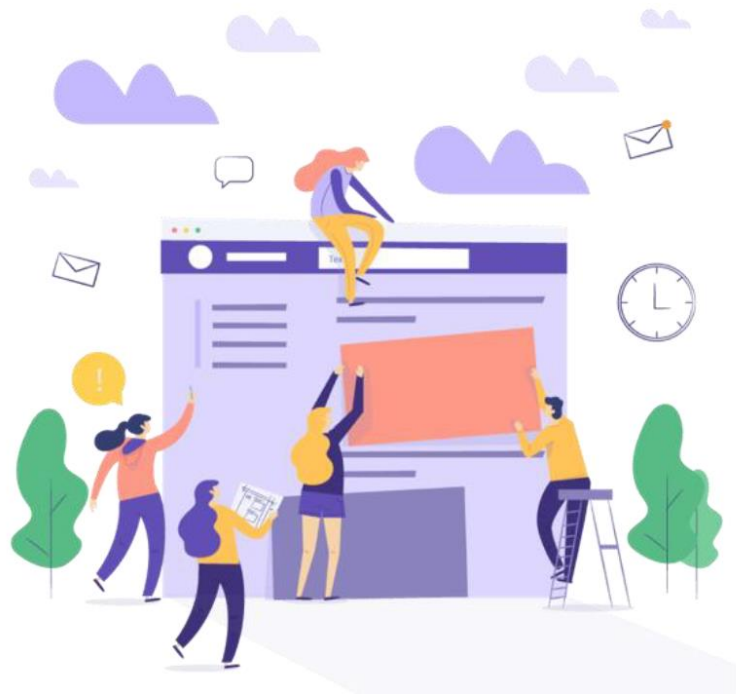


# Provider Rule Update



Below is the stakeholder feedback and response following the second window of review on draft rule language, August 2 - August 16, 2021.

Stakeholder Feedback	OOD Response
Are both <b>FBI and BCI background checks</b> required for all provider staff delivering direct services to OOD participants? Could providers only run Ohio BCI background checks for long-term Ohio residents?	OOD has expanded language in this area to clarify that in most instances both an FBI and BCI background check would not be required. In alignment with DODD requirements, <b>language has been updated to note that if provider staff have continuously lived within Ohio for at least five (5) years, only a BCI criminal background check is required.</b> If provider staff have lived within Ohio for fewer than five (5) years, or if they were convicted of a crime in another state or of a federal offense, an FBI and BCI criminal records background check is required to be completed.
Could the language regarding <b>CPI breaches and identity theft protection</b> be expanded to include meetings regarding any CPI breaches, and exploring all options to protect individuals?	OOD has reviewed this element of the proposed rule update and met with multiple provider organizations to discuss updated language. Updated language aligns more closely with internal OOD processes, whereby the specifics of each potential CPI breach will be looked at individually. <b>OOD will meet with providers to discuss the specifics regarding any CPI breaches and listen to potential provider solutions</b> before requiring identity theft protection be offered to participants.

\*Note: Stakeholder feedback condensed and streamlined for clarity