



IRAMS Staff Compliance Tracker Webinar Q&A

Introduction: What is the Staff Compliance Tracker?

1. Which agencies/organizations should use the Staff Compliance Tracker?

The Staff Compliance Tracker is designed for use by Health Homes Serving Children (HHSC) Care Management Agencies serving youth under the age of 21, Children and Youth Evaluation Services (C-YES), and designated providers of Children's Waiver Home and Community Based Services (HCBS). All such agencies/organizations operating in New York State must use the Staff Compliance Tracker to verify that affiliated care managers and/or Children's Waiver HCBS providers have met training, background check, and service qualification requirements specified by New York State Department of Health (NYS DOH).

2. What timeframe does the Staff Compliance Tracker Cover?

NYS DOH introduced the IRAMS Staff Compliance Tracker in June 2023, with the initial goal of collecting staff information for the 2022-2023 Waiver year (April 1, 2022 - March 31, 2023). Each agency/organization must finish entering all required staff information from the 2022-2023 Waiver year into the tracker by July 31, 2023, so NYS DOH can analyze the data and make a report to CMS. The tracker will then stay open so agencies/organizations can continue updating staff information throughout the 2023-2024 Waiver year and beyond. NYS DOH encourages each agency/organization to consistently maintain their Staff Compliance Tracker but will announce deadlines by which the tracker *must* be updated to "close out" each Waiver year.

Accessing the Staff Compliance Tracker

3. Who should have access to the Staff Compliance Tracker? Would it be appropriate for a care manager supervisor or assistant director to have the Staff Compliance Tracker role in addition to HR staff?

NYS DOH strongly recommends granting access to the Staff Compliance Tracker only to those staff who work in dedicated human resources/personnel positions or who are otherwise typically responsible for verifying training, background check, and service qualification requirements for new hires. Before granting access to any additional staff, such as a care manager supervisor or assistant director, the agency/organization should assess for conflicts of interest and privacy concerns. Staff should never be allowed to edit their own records in the Staff Compliance Tracker.

4. As a lead Health Home, we need to monitor compliance among our care management agencies (CMAs). Is there a way to see our CMAs' submissions to the Staff Compliance Tracker?

IRAMS Gatekeepers associated with lead Health Homes automatically received "read only" access to the Staff Compliance Tracker for each affiliated CMA. Lead Health Homes should contact the BH.Transition@health.ny.gov mailbox if they would like to change this default setting.

5. How do I access the Staff Compliance Tracker?

The Staff Compliance Tracker is located within the Incident Reporting and Management System (IRAMS). IRAMS is located within the Health Commerce System (HCS). This means that staff who need to access the Staff Compliance Tracker must



have a personal HCS ID *and* be an established IRAMS user who has been granted the permission for (Manage Staff Compliance or View Staff Compliance) appropriate for their job responsibilities.

- For assistance obtaining an HCS ID, contact your agency/organization's HCS Coordinator. If you do not know who your agency/organization's HCS Coordinator is, call the Commerce Account Management Unit (CAMU) Help Desk at 1-866-529-1890, option 1.
- For assistance with IRAMS user roles, contact your agency/organization's IRAMS Gatekeeper. If you do not know who your agency/organization's IRAMS Gatekeeper is, email BH.Transition@health.ny.gov to request this information.

6. What is the difference between the HCS Coordinator and the IRAMS Gatekeeper? Does the same person do both jobs?

HCS is a secure platform that hosts web-based apps for a wide variety of programs within NYS DOH. The HCS Coordinator has authority to request new HCS user accounts on behalf of staff within the same agency/organization. You must have an HCS account before you can have an IRAMS account. The IRAMS Gatekeeper has authority to establish new users and grant or revoke certain roles and permissions within IRAMS, including those needed to view or update the Staff Compliance Tracker. Depending on your organization/agency's size and structure, a single staff person may act as both HCS Coordinator and IRAMS Gatekeeper, or different staff may hold each role.

7. Our agency/organization does not have an IRAMS Gatekeeper. How do we get one? Do we need to choose a Gatekeeper from among our HR/personnel staff only, or could a Program Director be listed as a Gatekeeper?

The agency/organization may select any staff person to act as an IRAMS Gatekeeper. However, keep in mind that a Gatekeeper has authority to grant *themselves* roles and permissions in IRAMS; this means the selected staff will ultimately be able to view and edit all portions of IRAMS, including the Staff Compliance Tracker. Once your agency/organization has identified an appropriate staff person, the staff person should use this link to request the Gatekeeper role:

<https://inprep.health.ny.gov/#/request-gatekeeper>.

8. Our Gatekeeper does not have access to the Staff Compliance Tracker. What should we do?

In most cases, the IRAMS Gatekeeper will *not* automatically have access to the Staff Compliance Tracker. If your agency/organization determines that the Gatekeeper should have full access to the Staff Compliance Tracker, the Gatekeeper must grant themselves the Manage Staff Compliance permission. (See detailed instructions for managing roles and permissions on pages 16-20 of the [Children's Services Capacity and Staff Compliance Trackers System User Guide](#).) Only IRAMS Gatekeepers *associated with lead Health Homes* automatically have the View Staff Compliance role. NYS DOH pre-assigned this role to these Gatekeepers so lead Health Homes could monitor their care management agencies (CMAs).

9. For agencies who provide both Care Management and HCBS, there are separate IRAMS Organization accounts in HCS. Will it be possible to track all staff qualifications through a single IRAMS account, or will HR now need access to two different IRAMS accounts to update care manager staff in one location and HCBS staff in another location?

Agencies who provide both care management and HCBS will be listed separately in the system. Staff who will be entering information for both care managers and HCBS providers must be assigned the Staff Compliance Tracker role and the Manage Staff Compliance permission type for *both* agencies/organizations. Staff will be able to use the drop-down menu to choose which organization to work on and will be able to switch between organizations



without having to log out of and back into IRAMS.

- 10. We are an HCBS provider and CMA. I am the Gatekeeper, and I can see the CMA staff but not the HCBS provider staff. When I log in as the HCBS provider organization, I don't see the Staff Compliance Tracker or the Settings icon that I normally use to manage roles and permissions.**
- Email BH.Transition@health.ny.gov to verify whether you have been established as the Gatekeeper for the HCBS provider organization.

Adding Staff

- 11. Which staff should be tracked with the Staff Compliance Tracker?**

You *must* include each staff person who provided care management, HCBS to Children's Waiver participants, and all supervisors of those staff members, *any time* from April 1, 2022, forward, even if the staff person or supervisor is no longer active in that position due to promotion, reassignment, termination, etc. Do *not* include: care managers or HCBS providers who work exclusively with adults (ages 21 and older), administrative, human resources, IT, quality assurance, or other staff who do not interact with children under age 21.

- 12. There are mistakes in the data that NYS DOH prepopulated in our Staff Compliance Tracker. What should we do?**

If your agency/organization submitted a Qualification and Training Tracker spreadsheet for Waiver year 2021-2022, NYS DOH used this data to prepopulate your Staff Compliance Tracker. Due to an initial error in the upload, many agencies/organizations had incomplete or incorrect data prepopulated in their Staff Compliance Trackers. NYS DOH corrected the error and notified agencies/providers via an email blast sent on June 30, 2023. If you have additional questions concerning prepopulated data, please email BH.Transition@health.ny.gov.

- 13. What are the best practices for deleting staff versus end dating employment?**

When staff leave your agency/organization, you must add an employment end date in the Staff Compliance Tracker. A staff person should only be deleted from the system if they were added in error (that is, if they were never truly hired by your agency/organization).

Adding/Editing Demographic Information

- 14. Are HCS IDs assigned by agency/organization, or are they unique to the individual staff? What do we do if a staff person doesn't have an HCS ID?**

HCS IDs are unique to the individual staff person. Care managers *must* have an HCS ID, while HCBS providers *may* have an HCS ID but are not required to. If the HCBS provider you are adding does not have an HCS ID, simply leave this field blank.

- 15. Where do the due dates on the system come from, and is there a place to modify dates on the tracker if incorrect?**

The system is configured to generate due dates for all trainings and background checks based on the employee's date of hire and relevant DOH policy. For HCBS providers please refer to the HCBS manual, for HH CMs please refer to the Health Home Standards and Requirements document.



Adding/Editing Employment Information

16. Should employment history be a complete history as per the staff person's resume?

No, you should not capture each staff person's entire resume. Employment history should include the staff member's Hire Date/First Day in the Role at your agency, the type of staff they are, and their employment type.

17. What exactly does "Hire Date/First Date in Role" mean? How do we handle staff who held different positions within our agency/organization for many years before becoming a care manager or HCBS provider to Children's Waiver participants? What about staff who completed clearance checks and trainings as part of the hiring process but didn't start working until several weeks later?

"Hire Date/First Day in Role" *always* means the date a staff person was hired for the specific role being tracked—that is, care manager or HCBS service provider.

18. Should the Hire Date be the same date as the background check results? Can the completion date for Mandated Reporter Training also be the same as the Hire Date?

Again, the Hire Date should be the date the staff member was hired for the specific role being tracked (that is, care manager or HCBS service provider). This date may be prior to, on, or after the date of the background checks, depending on the agency's internal processes. Mandated Reporter Training may be completed on, after, or before the date of hire for care managers. Mandated Reporter Training may be completed on or after the date of hire for HCBS staff, or up to 1 year prior to the Hire Date at the agency. HCBS Staff who completed Mandated Reporter Training prior to that timeframe would be required to re-take the training upon hire, prior to delivery services.

19. What Hire Date should we input for 1915(c) Waiver transitioning staff? Their training dates may not line up. For example, all transitioning staff took Mandated Reporter Training upon their original Hire Date, but other mandatory trainings were started during the time of transition.

When recording a staff member's Hire Date, make sure you use the date they were hired into the specific role (CM or HCBS provider) for which requirements are being tracked. If the Staff Compliance Tracker still flags the trainings as late, select "Training resources not available within the timeframe" from the dropdown and use the Late Explanation textbox to note that the staff member was employed during the transition of the 6 previous Waivers into the consolidated Children's Waiver.

20. If someone is a 1099, are they considered a subcontractor?

If the 1099 contractor is a direct hire of the agency, they would be considered an employee. If the 1099 Contractor is hired through a separate entity (such as a staffing firm), they would be considered a subcontractor.

Adding/Editing Clearance Checks

21. If a staff member was a legacy provider in their agency and had their background checks grandfathered in, does that pose a problem?

No, as the Criminal History Record Check (CHRC), Statewide Central Register (SCR), and Staff Exclusion List (SEL) checks are only required for staff who were hired after 4/1/2018.

22. Our agency/organization does SEL checks every month. Do we have to log in and enter the result every month or only upon hiring?



SEL is not required to be completed monthly, as long as it is completed prior to a staff initially providing services. If there is a need for an SEL check later, the Justice Center will reach out to the agency regarding specific individuals.

23. What is the difference between the CFTSS and the HCBS background checks?

Reporting staff background check results into IRAMS is not a requirement for CFTSS providers but is a requirement for Children's HCBS providers. Please reference the [Background Check Requirements for Home and Community Based Services \(HCBS\) Providers Policy](#) for additional information on HCBS background check requirements and the CFTSS Manual for additional information on background check requirements for CFTSS providers.

24. If staff were grandfathered into an agency, including their previously conducted background check/fingerprinting, are they required to be re-fingerprinted when joining a new agency?

Existing CMs/HCBS providers serving children only are required to be re-fingerprinted and have new background checks conducted upon hire with a new agency.

Adding/Editing Trainings

25. Where can agencies find calendar information on when and where to conduct trainings?

For HCBS providers please refer to the HCBS manual [Children's HCBS Manual](#), for HH CMs please refer to the [Health Home Standards and Requirements](#) document.

26. Do trainings need to be completed within 6 months of hire, or 6 months of start date for providing services?

For both CMs and HCBS staff, trainings must be completed within 6 months of their date of hire at the agency. For care managers who previously completed required trainings at another CMA/HH, date of required trainings verified as previously completed through another CMA may be entered into the system any time prior to the current date. For CMs that are entirely new (i.e., did not come from another CMA/HH, trainings must be completed within 6 months of hire, and Mandated Reporter Training must be completed prior to the delivery of services. For HCBS providers, trainings must take place on or after their hire date at the agency and be completed within 6 months of their hire date. Mandated Reporter Training is an exception to this and may be entered with a date up to 1 year prior to the date of hire at the agency and must be completed prior to providing services.

27. How should dates be entered for employees who complete the training as part of the application process?

This would be the responsibility of the agency to determine based on their own onboarding processes. The agency may choose to make the employee "hire date" the same as the date of training completion, if appropriate.

28. Is the OCFS Mandated Reporter Training required to be completed? Can staff complete other Mandated Reporter trainings instead? What do we do about staff who did not complete this training within the required timeframe?

The State provided OCFS Mandated Reporter training is required, as outlined in Appendix E of the Children's HCBS Manual. As such, the agency/organization must enter the date the staff member completed this training (which could be up to 1 year prior to employment with your agency). Staff members who completed this training outside of the 1 year prior to employment window or who completed a training other than the OCFS provided version are out of compliance and should complete this training immediately.



29. For trainings such as Plan Of Care, should the Training Date indicate the first time the training was taken or the last date the training may have been re-taken?

For annual trainings (including POC), the date the trainings were initially completed should be the date included in the system. You may enter additional training dates if your agency wishes to do so.

Adding/Editing Service Qualifications

30. Some of our care managers have had education qualifications waived. Is there a way to show this in the Staff Compliance Tracker?

If a care manager had their qualifications waived, please indicate this using the “Staff Qualification Waiver” option.

31. What about staff who provide multiple services?

If an HCBS staff provides more than one service, the agency/organization will need to select which services they provide and their qualifications as appropriate on the Services tab.

Miscellaneous

32. Is there a way for us to bulk upload data to the Staff Compliance Tracker using an Excel spreadsheet (like NYS DOH did to prepopulate some of our staff information)?

This feature is not currently available, but NYS DOH will consider adding it in the future.

33. Is there a way to download a report of all employees on the IRAMS site to compare the missing employees through a lookup?

An ‘Export Staff List’ button is now available on the tracker when viewing staff in an agency. This feature allows agencies to locate duplicative or missing staff via a downloadable Excel spreadsheet. However, changes must be made manually in the system and not in the Excel file.

34. Does the Staff Qualification Tracker have any data exchange capabilities? For example, when an employee is terminated in CHRC, will they appear to be terminated in IRAMs also? Is there a way to connect our internal management information systems to IRAMS so the Staff Compliance Tracker automatically updates?

No, the Staff Qualification Tracker does not have any data exchange capabilities, although NYS DOH will consider adding features of this kind in the future. If a staff member is terminated an agency will have to enter the last day of employment in the employment history section.

35. Where can we find more information about the Staff Compliance Tracker?

You can find slides from our June 28, 2023, PowerPoint presentation [here](#). The Children’s Services Capacity and Staff Compliance Trackers System User Guide is available [here](#). If you still have questions, please contact us at BH.Transition@health.ny.gov.