

DRAFT Utah HCBS Setting Transition Plan

Section 1. Public Notice and Comment Process

Action Item	Description	Proposed Start Date	Proposed End Date	Sources	Stakeholders	Progress/ Status
Make at least two statements of public notice that include a description of procedures on providing public comment and feedback	State will post public notice in Deseret News and Salt Lake Tribune.	10/9/2014	10/9/2014	 HCBS Meeting Public Notice.pdf	HCBS Clients, Advocates, Providers, DMHF, DSPD, and DAAS	Complete
	State will distribute notice through multiple forums including: email, listserv, online, and hard copies.	10/9/2014 10/22/2014	10/9/2014 10/22/2014	 Utah Home and Community Based S	HCBS Clients, Advocates, Providers, DMHF, DSPD, and DAAS	Complete
Disseminate Draft Transition Plan	State will widely disseminate draft Transition Plan through the following channels: <ul style="list-style-type: none"> DOH Website http://health.utah.gov/ltc/hcbstransition DOH and DHS Listservs Distribute electronic copies and links to known advocacy and stakeholder organizations and request distribution to constituencies Provide info on accessing plan at regularly scheduled stakeholder meetings Make hard copies of plan available upon request through the Medicaid agency, through case management agencies and local DHS offices. 	10/22/2014	12/1/2014	Draft Transition Plan	HCBS Clients, Advocates, Providers, DMHF, DSPD, and DAAS	
Hold Transition Plan Meetings	State will hold a public meeting to discuss draft Transition Plan. State will publish notice on the Utah Public Notice Website: http://www.utah.gov/pmn/sitemap/notice/237217.html	10/29/2014	10/29/2014	Draft Transition Plan	HCBS Clients, Advocates, Providers, DMHF, DSPD, and DAAS	
	State will discuss draft Transition Plan at multiple stakeholder meetings to include but not limited to: Utah Indian Health Advisory Board, Medical Care Advisory Committee, Utah Developmental Disabilities Council, Disability Advisory Council, Utah Assisted Living Facility Association, Utah Health Care Association, Utah Association of Community Services Providers.	10/22/2014	12/1/2014	Draft Transition Plan	See Description Section	
Accept Public Comment	State will accept public comment via: Website: http://health.utah.gov/ltc/hcbstransition OR Mail: Utah Department of Health Division of Medicaid and Health Financing Attn: HCBS TRANSITION PLANNING COMMENTS PO Box 143112 Salt Lake City, UT 84114-3112 OR Fax: 801-323-1588	10/22/2014	12/1/2014	Public Comments	HCBS Clients, Advocates, Providers, DMHF, DSPD, and DAAS	

Action Item	Description	Proposed Start Date	Proposed End Date	Sources	Stakeholders	Progress/ Status
Retain and Summarize Public Comment	State will: <ul style="list-style-type: none"> • Compile all public comments received during the public comment period • Carefully consider public comments and modify the Transition Plan as it deems appropriate • Provide to CMS, a summary of the public comments received and an explanation of whether comments resulted in modifications to the Transition Plan, including the rationale for the decision. 	12/1/2014	2/1/2015	Public Comments	HCBS Clients, Advocates, Providers, DMHF, DSPD, and DAAS	
Publish Transition Plan Iterations	State will publish all iterations of the Transition Plan and will include the rationale as changes are made.	10/22/2014	3/17/2019	Public Comments, CMS Approval	HCBS Clients, Advocates, Providers, DMHF, DSPD, and DAAS	
State will Provide CMS with Quarterly Updates until Section 1. of the Transition Plan is Completed						

Section 2. Assessment Process

Action Item	Description	Proposed Start Date	Proposed End Date	Sources	Stakeholders	Estimated Hours Involved	Progress/ Status
Establish Transition Plan Workgroup	In addition to the general public input process, a Transition Plan Workgroup will be created and will be comprised of HCBS stakeholders. The workgroup will meet periodically to review draft documents, interim reports and progress throughout the life-cycle of the transition planning and implementation process.	1/1/2015	When Transition Plan is Fully Implemented	N/A	HCBS Clients, Advocates, Providers, DMHF, DSPD, and DAAS	N/A	
Identify HCBS Waiver Sites of Services	State will identify the universe of current providers and their corresponding sites of service for each of its seven HCBS waivers.	11/1/2014	12/31/2014	Review Enrolled HCBS Medicaid Providers/Provider Types (MMIS)	HCBS Clients, Advocates, Providers, DMHF, DSPD, and DAAS	40	
Disseminate Provider Informational Letters	State will send informational letter to providers that describes appropriate HCBS setting requirements, transition plan assessment steps that will include State review and provider self-assessment. Letter will describe provider's ability to remediate issues to come into compliance within deadlines and that technical assistance will be available throughout the process.	2/1/2015	2/1/2015	Informational Letter	HCBS Clients, Advocates, Providers, DMHF, DSPD, and DAAS	40	

Action Item	Description	Proposed Start Date	Proposed End Date	Sources	Stakeholders	Estimated Hours Involved	Progress/ Status
Complete Preliminary Categorization of Sites as Fully Compliant, Not Yet Compliant or Not Compliant	Using tools from the CMS HCBS Settings Review Toolkit, the State will conduct a preliminary screening to categorize which settings are likely to be Fully Compliant, Not Yet Compliant or Not Compliant with HCBS characteristics.	1/1/2015	3/31/2015	Review Enrolled HCBS Medicaid Providers/Provider Types (MMIS)	HCBS Clients, Advocates, Providers, DMHF, DSPD, and DAAS	80	
Employ multiple processes to evaluate sites that are potentially Not Yet Compliant or Not Compliant with HCBS characteristics	State will create a Provider Self-Assessment Tool and require providers categorized as Not Yet Compliant or Not Compliant to submit results of the Provider Self-Assessment.	5/1/2015	7/31/2015	Provider Self-Assessment Tool	HCBS Clients, Advocates, Providers, DMHF, DSPD, and DAAS	80	
	State will modify evaluation tools used in contract, certification or licensing reviews of providers categorized as Not Yet Compliant or Not Compliant.	5/1/2015	7/31/2015	Modified State Evaluation Tools	HCBS Clients, Advocates, Providers, DMHF, DSPD, and DAAS	80	
	State will begin utilizing modified evaluation tools in scheduled contract, certification or licensing reviews of providers categorized as Not Yet Compliant or Not Compliant.	8/1/2015	7/31/2016	Results of State Modified Evaluation Tools	Providers, DMHF, DSPD, and DAAS	600	
Complete Final Categorization of Sites as Fully Compliant, Not Yet Compliant or Not Compliant	State will identify providers with sites of service that are Fully Compliant, Not Yet Compliant or Not Compliant.	8/1/2016	9/30/2016	Results of Provider Self-Assessment and State Modified Evaluation Tools	DMHF, DSPD, and DAAS	80	
Notify Individual Providers or Assessment Findings	State will present each provider with assessment of their organizational HCBS setting as determined through State review and/or Provider Self-Assessment	10/1/2016	12/31/2016	Results of Provider Self-Assessment and State Modified Evaluation Tools	DMHF, DSPD, and DAAS		
State will Provide CMS with Quarterly Updates until Section 2. of the Transition Plan is Completed							

Section 3. Remediation Strategies

Action Item	Description	Proposed Start Date	Proposed End Date	Sources	Stakeholders	Estimated Hours Involved	Progress/ Status
Employ New Provider Enrollment Education and Screening for HCBS Setting Compliance	State will modify HCBS Waiver provider enrollment documents to provide education and confirm compliance with HCBS setting requirements prior to enrolling new Medicaid providers. Providers will be required to certify that they have received information about and understand the HCBS setting requirements.	1/1/2015	Ongoing	New Provider Enrollment and Education Forms	HCBS Clients, Advocates, Providers, DMHF, DSPD, and DAAS	80 to update documents, then ongoing part of business process.	
Update HCBS Provider Manuals	State will revise HCBS provider manuals to incorporate HCBS setting requirements.	1/1/2015	6/30/2015	42 CFR 441.301	HCBS Clients, Advocates, Providers, DMHF, DSPD, and DAAS	160	
Collaborate to Develop Provider Remediation Plan	Based on individual provider assessment findings, the State and providers will collaborate to: <ul style="list-style-type: none"> Determine the remediation plan for the individual provider, including timelines for completion. The State will allow reasonable timeframes for significant infrastructure changes, but will require submission of routinely scheduled status reports to demonstrate ongoing progress toward remediation. All plans must be fully implemented by 3/17/2019. For individual waiver clients, assure that any modification of conditions under 42 CFR §441.301(c)(4)(vi)(A) through (D) are supported by a specific assessed need and justified in the individual client’s person-centered service plan 	1/1/2016	12/31/2018		Providers, DMHF, DSPD, and DAAS	2000	
Develop Compliance Tools	State will: <ul style="list-style-type: none"> Develop tool to assess level of compliance with HCBS setting requirements at each of the provider’s settings Develop tool to ensure that person-centered planning requirements are met when there is any modification of conditions under 42 CFR §441.301(c)(4)(vi)(A) through (D). 	9/1/2015	12/31/2015		HCBS Clients, Advocates, Providers, DMHF, DSPD, and DAAS	120	
Track Provider Status	State will create a system to track provider progress toward, and completion of, individual remediation plans. System will have the ability to show compliance by waiver and for all HCBS waiver programs.	10/1/2016	3/17/2019		DMHF, DSPD, and DAAS	200	

Action Item	Description	Proposed Start Date	Proposed End Date	Sources	Stakeholders	Estimated Hours Involved	Progress/ Status
Conduct Onsite Compliance Reviews	After the provider has completed its individual provider remediation plan, State will conduct onsite reviews using newly developed compliance tools to confirm full implementation of the remediation plan.	1/1/2016	1/31/2019		DMHF, DSPD, and DAAS	2000	
Provider Sanctions and Disenrollments	State will disenroll and/or sanction providers that have failed to implement the individual provider remediation plan.	2/1/2019	3/17/2019		DMHF, DSPD, and DAAS	100	
State will Provide CMS with Quarterly Updates until Section 3. of the Transition Plan is Completed							

Acronyms

CFR – Code of Federal Regulations

CMS – Centers for Medicare and Medicaid Services

DAAS – Division of Aging and Adult Services

DHS – Department of Human Services

DMHF – Division of Medicaid and Health Financing

DOH – Department of Health

DSPD – Division of Services for People with Disabilities

HCBS – Home and Community Based Services

MMIS – Medicaid Management Information System