HCBS Settings

State Home and Community Based Services (HCBS) Setting Transition Plan Due 7/31/2014

Section 1: Assessment

Action Item	Description	Proposed Start Date	Proposed End Date	Sources	Players	Estimated Hours Involved	Progress/Status
Site of service breakdown	State identifies site of service possibilities for HCBS services not excluded from the settings expectations. **Attachment of results to be included in State Transition Plan.**	4/1/2014	4/15/2014	Iowa Administrative Code (IAC); MMIS; Self-Assessments; "Guidance on Settings that Have the Effect of Isolating Individuals Receiving HCBS from the Broader Community"	Long Term Care (LTC) Policy; Provider Services; HCBS; Behavioral Health Organization (BHO); Mental Health and Disability Services (MHDS) Division	100	
Site of service sort	institution or are HCB. **Attachment of results to be included in State Transition Plan.**	4/15/2014	4/30/2014	Modified "Template for State Setting Analysis"	LTC Policy; HCBS; BHO; MHDS	100	
Assessment of site of service viability	State assesses HCBS settings as they conform to HCBS characteristic and ability to adjust in future (Yes, Not Yet, No) **Attachment of results to be included in State Transition Plan.**	5/1/2014	5/15/2014	Modified "Template for State Setting Analysis"; Modified "Exploratory Questions to Assist States in Assessment of Residential Settings"; Create database for logging	HCBS; LTC Policy; Provider Services; BHO; MHDS; Associations	40	
Incorporation of Assessment into HCBS Unit, BHO Provider Credentialing, and Iowa Medicaid Provider Pre-Enrollment Screening Reviews	State will meet and operationalize mechanisms to incorporate individual setting assessments, flagged member surveys, and HCB technical assistance into existing processes. **Updates provided to CMS as needed.**	5/1/2014	6/31/2014	Existing Operational Procedures; Modified "Template for State Setting Analysis"; Modified "Exploratory Questions to Assist States in Assessment of Residential Settings"; IPES; Provider Pre-Enrollment Screening Assessment Tool; HCBS Review Tools	LTC Policy; Provider Services; BHO; HCBS	40	
Geographic Information System (GIS) Evaluation of HCBS Provider Locations and HCBS Member Addresses on File	State will use GIS to analyze potentially isolating locations of provider sites and congregate member living. **Updates provided to CMS as needed.**	5/1/2014	7/31/2014	Addresses on MMIS Provider File (provider type 99, 64, 23, 97); Addresses on MMIS Recipient File (waiver type A, B, C, D, F, H, M, and P); Addresses on BHO Provider File; Addresses on BHO Recipient File; GIS Software	LTC Policy; BHO; CORE Unit; HCBS; MHDS; DIA		
Site of service - individual identification (QOI)	State identifies providers with sites of service that have qualities of an institution. **Updates provided to CMS as needed.**	6/1/2014	4/31/2015	Modified "Template for State Setting Analysis"; Modified "Exploratory Questions to Assist States in Assessment of Residential Settings"	HCBS; Case Managers; Department of Inspections and Appeals (DIA); LTC Policy; BHO; MHDS	480	
Site of service - individual identification (HCB)	State identifies providers with sites of service that have qualities HCB. **Updates provided to CMS as needed.**	6/1/2014	4/31/2015	Modified "Template for State Setting Analysis"; Modified "Exploratory Questions to Assist States in Assessment of Residential Settings"	HCBS; Case Managers; DIA; LTC Policy; BHO; MHDS	1000	

Action Item	Description	Proposed Start Date	Proposed End Date	Sources	Players	Estimated Hours Involved	Progress/Status
Enrolled HCBS providers self-assess	All enrolled HCBS providers will submit additional information on their Provider Self-Assessments to assist in data collection. **Updates provided to CMS as needed.**	12/1/2014	2/28/2015	2014 Provider Self-Assessment (modified to capture settings information)	Enrolled providers; HCBS	500	
Other projects collecting HCBS setting data	State consultant will incorporate HCBS setting questions into existing provider surveys. State provider stakeholder association will survey residential providers and provide findings to the state. **Updates provided to CMS as needed.**	6/1/2014	10/31/2014	Technical Assistance Collaborative (TAC) Survey; Iowa Association of Community Providers (IACP) Residential Provider Survey	LTC Policy; MHDS; Technical Assistance TAC; IACP	400	
Iowa Participant Experience Survey (IPES)	State will continue to monitor their IPES results to flag member experience that is not consistent with assuring control over choices and community access. **Updates provided to CMS as needed.**	4/1/2014	In perpetuity	IPES Survey; Logging tool	HCBS	1000	
Onsite Assessment Results Report	State compiles and analyzes findings of onsite assessments. **Updates provided to CMS as needed.**	5/1/2015	6/31/2015	Data compiled from documents and logged into database - Remedial strategies included at aggregate and individual level	LTC Policy; HCBS Data Analyst/Statistician	30	
Onsite Assessment Results Report Presentation	State formally presents findings of onsite assessment to DHS management and stakeholders. **Updates provided to CMS as needed.**	7/1/2015	7/31/2015	Data compiled from documents and logged into database - Remedial strategies included at aggregate and individual level	LTC Policy; DHS Management; BHO Management; Associations; Legislative Services; MHDS	30	

Section 2: Remedial Strategies

Action Item	Description	Proposed Start Date	Proposed End Date	Sources	Players	Estimated Hours Involved	Progress/Status
Informational Letters	State will draft and finalize informational letters describing proposed transition, appropriate HCBS settings, deadlines for compliance, and technical assistance availability. BHO will provide the same information to provider network. **Updates provided to CMS as needed.**	6/1/2014	7/31/2016	CMS Guidance; Proposed Transition Plan; CFR	LTC Policy; BHO; HCBS	40	
Iowa Administrative Code	State will work to revise programmatic rules to reflect final regulations on HCBS setting requirements. Rules will define HCBS setting thresholds and will prohibit new sites from being accepted or enrolled that have an institutional or isolating quality while presenting deadlines for enrolled providers to come into compliance. Rules will clarify expectations of member control of their environment and access to community. BHO will develop the same standards for provider network. **Updates provided to CMS as needed.**	8/1/2014	7/31/2015	CMS Guidance; Proposed Transition Plan; CFR; Iowa Administrative Code 441-77-79	LTC Policy; HCBS; BHO	60	
Provider Manual Revisions	State will work to revise HCBS provider manuals to incorporate regulatory requirements for HCB and qualities of an HCB setting. BHO will incorporate the same information into relevant provider network manuals. **Updates provided to CMS as needed.**	8/1/2015	12/31/2015	CMS Guidance; Proposed Transition Plan; CFR; 16K Manual	LTC Policy; HCBS; BHO	60	

Action Item	Description	Proposed Start Date	Proposed End Date	Sources	Players	Estimated Hours Involved	Progress/Status
Incorporate Education and HCB Compliance Understanding into Provider Enrollment	Provider Services Unit Pre-Enrollment Screening process will make adjustments to ensure that they can assess HCB settings when appropriate. When agencies enroll to provide HCBS services, they will be provided technical assistance on HCB setting requirements and be required to certify that they have received, and understand, these setting requirements. **Updates provided to CMS as needed.**	5/1/2014	3/17/2019 (and beyond)	Modified "Template for State Setting Analysis"; Modified "Exploratory Questions to Assist States in Assessment of Residential Settings"; Provider Enrollment Tools; Provider Agreement	LTC Policy; HCBS; Provider Services Unit; BHO	500	
Provider Assessment Findings	State will present each provider with the assessment of their organizational HCBS settings as determined though state review or provider self-assessment. **Updates provided to CMS as needed.**	7/1/2014	6/30/2016	Modified "Template for State Setting Analysis"; Modified "Exploratory Questions to Assist States in Assessment of Residential Settings"	HCBS; Enrolled providers; BHO	480	
Provider Individual Remediation	HCBS providers will self-disclose remediation plans or state will preset remediation requirements for each organization's HCB settings. Providers will be required to submit periodic status updates on remediation progress. The state will allow reasonable timeframes for large infrastructure changes with the condition that the providers receive department approval and provide timely progress reports on a regular bases. **Updates provided to CMS as needed.**	8/1/2014	3/17/2019	Modified "Template for State Setting Analysis"; Modified "Exploratory Questions to Assist States in Assessment of Residential Settings"	HCBS; Enrolled providers; BHO	480	
Data Collection	State and BHO will collect data from reviews, technical assistance, updates, etc. to track status of non-HCB sites and transitions made. Data will be reported on a regular basis or ad hoc to upper management and CMS. **Updates provided to CMS as needed.**	4/1/2014	3/17/2019	Electronic tools developed to capture data.	HCBS; BHO	2000	
Compliance Tool	State will develop tool utilized to capture level of compliance with HCB compliance following remediation. **Updates provided to CMS as needed.**	8/1/2014	10/31/2014	Modified "Template for State Setting Analysis"; Modified "Exploratory Questions to Assist States in Assessment of Residential Settings"; IAC; CFR; CMS Guidance	LTC Policy; HCBS; BHO	30	
Onsite Compliance Reviews	State will conduct onsite reviews to establish levels of compliance reached by providers with non-HCB settings following completion of their remediation schedule. **Updates provided to CMS as needed.**	7/1/2015	3/1/2019	Compliance Tool	HCBS; BHO; Provider Services	3000	
Provider Sanctions and Disenrollments	State will disenroll and/or sanction providers that have failed to meet remediation standards. State will disenroll and/or sanction providers that have failed to cooperate with the HCBS Settings Transition. **Updates provided to CMS as needed.**	8/1/2014	3/17/2019 (and beyond)	Modified "Template for State Setting Analysis"; Modified "Exploratory Questions to Assist States in Assessment of Residential Settings"; Disenrollment Template Letter; Sanction Template Letter	HCBS; Enrolled providers; BHO; Attorney General	100	

Action Item	Description	Proposed Start Date	Proposed End Date	Sources	Players	Estimated Hours Involved	Progress/Status
Member Transitions to HCB Compliant Settings	If necessary, the state will work with case managers, service workers, and care coordinators to ensure that members are transitioned to providers meeting HCBS Setting Requirements or have fully cooperated in the transition process. Members will be given timely notice and a choice of alternative providers through a person centered process. Transition of members will be comprehensively tracked to successful placement and continuity of service. **Updates provided to CMS as needed.**	8/1/2014	3/17/2019 (and beyond)	Disenrollment Template Letter; Sanction Template Letter; Pull of Members Affected and Attached Case Mangers, Service Workers, and Care Coordinators	LTC Policy; Program Integrity; HCBS; BHO	300	

Section 3: Public Comment

Action Item	Description	Proposed Start Date	Proposed End Date	Sources	Players	Estimated Hours Involved	Progress/Status
PSA - Assessment Plan and Public Input	State shares method of assessment with public stakeholders, asks for input, and designates LTC point of contact. **Attachment of results to be included in State Transition Plan.**	5/1/2014	5/31/2014	Proposed Section 1 of Proposed Transition Plan	LTC Policy; Associations; Case Managers; Service Workers; Iowa Department on Aging; MHDS; Department of Inspections and Appeals; HCBS; BHO; MAAC; ISAC	40	
Public Comment Period and Meetings - Proposed Transition Plan	State commences stakeholder forums, shares proposed transition plan with public, collects comments, develops summary of comments for CMS, summary of state response to public comments, and incorporate appropriate suggestions into transition plan,. The state will document all iterations of the transition plan. **Attachment of results to be included in State Transition Plan and provided to CMS and public as needed.**	5/1/2014	5/31/2014	Section 1, 2 and 3 of Proposed Transition Plan	LTC Policy; Associations; Case Managers; Service Workers; Iowa Department on Aging; MHDS; Department of Inspections and Appeals; HCBS; BHO; MAAC; ISAC	100	
Public Comment Retention	State will safely store public comments and state responses for CMS and public consumption. State will publically post FAQs on an ongoing basis. **Updates provided to CMS as needed.**	5/1/2014	3/17/2019	Public Comment and State Response Document; FAQs	LTC Policy; Associations; Case Managers; Service Workers; Iowa Department on Aging; MHDS; Department of Inspections and Appeals; HCBS; BHO; MAAC; ISAC	50	
Posting of Transition Plan Iterations	State will post all iterations of the transition plan and rationale with narrative rationale for changes made. **Updates provided to CMS as needed.**	5/1/2014	3/17/2019	Section 1, 2 and 3 of Transition Plan Iterations; Rationale for Changes Made	LTC Policy; Associations; Case Managers; Service Workers; Iowa Department on Aging; MHDS; Department of Inspections and Appeals; HCBS; BHO; MAAC; ISAC	300	
PSA - Assessment Findings Report	State shares the findings of the onsite assessment. **Updates provided to CMS as needed.**	7/1/2015	7/31/2015	Data compiled from documents and logged into database - Remedial strategies included at aggregate and individual level	LTC Policy; Associations; Case Managers; Service Workers; Iowa Department on Aging; MHDS; Department of Inspections and Appeals; HCBS; BHO; MAAC; ISAC	60	