

Louisiana Draft Home and Community Based Services Transition Work Plan

Program Review and Assessment			
Action Step	CSoc	1915(i)	Comments
Review licensure and certification rules & operations	Completed – Link with results provided	Completed – Link with results provided	COMPLETED – Results are included in the “HCBS Settings Analysis” document at the following link www.dhh.louisiana.gov/index.cfm/page/1973 .
Analyze and include additional requirements to certification standards, processes and frequency of review in order to comply with HCBS settings rule.	Completed - changes were not identified.	Completed -changes were not identified.	
Review provider qualifications to identify areas requiring modifications to comply with settings rule.	Completed 10/31/14- changes were not identified.	Completed 1/31/15 - changes were not identified.	
Review all existing HCBS Waiver Services/Settings to determine compliance with HCB Settings rule.	10/31/14	1/31/15	
Prepare list of services subject to new rule. Classified as: 1) clearly meets HCBS setting rule; 2) with modifications, will meet new settings rule; 3) meets CMS close scrutiny review; 4) unclear if new setting rule will be met; and 5) services meet the definition of an institution.	10/31/14	1/31/15	
Draft a self-assessment tool that familiarizes providers with the new settings rule and allows an opportunity to measure			In process

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compliance with the new requirements. The assessment tool will identify areas for the new rule for which the provider is non-compliant and will allow providers to target compliance efforts. The tool will include questions that accurately assess provider compliance; and methods to quantify provider assessment results.			
Determine the method of distribution and the parties responsible for conducting the assessment.	2/2/15	2/2/15	OBH will mail/email the assessments.
Draft participant survey to validate the results of the provider self-assessment.	3/1/15 - 4/30/15		In process
Issue draft self- assessment tool and participant survey to stakeholders for comment.			Awaiting draft from Suzanne.
Modify self-assessment tool and participant survey based on stakeholder comments.			
Distribute self-assessment to providers and participant survey to consumers.	3/1/15 - 4/30/15	3/1/15 - 4/30/15	
Provide training to providers and participants			
Conduct random site reviews to validate the self-assessment findings	5/1/15 - 6/30/16	5/1/15 - 6/30/16	

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Analyze the results of the on-site survey assessment to identify specific issues and challenges that will need to be addressed throughout the transition phase.			
Collect self- assessment information, aggregate and analyze. Include findings and analysis on the Website and prepare report for CMS.			
Analyze the findings for the participant survey. Include findings and analysis on the Website	6/1/15 - 8/30/15	6/1/15 - 8/30/15	
Analyze the results of the self-assessment submitted by providers.	6/1/15 - 8/30/15	6/1/15 - 8/30/15	

Remediation Strategies			
Action Step	CSoC	1915(i)	Comments
Ensuring Providers are Compliant			
Identify and send letters to providers who are not compliant with HCB settings rule.	2/1/15 - 2/28/15	2/1/15 - 2/28/15	
Providers who are not in compliance and wish to remain enrolled as waiver providers will submit a corrective action	9/1/15 - 8/30/16	9/1/15 - 8/30/16	

plan. Non-compliance may not extend beyond March 17, 2019.			
Technical assistance will be available to providers to ensure that the interpretation of the HCB setting rule is the same and the provider is implementing necessary changes to meet compliance.	6/1/15 - 8/30/16	6/1/15 - 8/30/16	
Louisiana will conduct on-site reviews to evaluate validity of remediation compliance.	9/1/15 - 8/30/16	9/1/15 - 8/30/16	
A disenrollment process of non-compliant providers will be developed and consist of: 1) provider disenrollment; 2) transition plan for participants; and 3) appeal rights for participants and providers.	9/1/15 - 8/30/16	9/1/15 - 8/30/16	
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Ensuring Providers are Compliant			
Develop monitoring instrument to ensure setting compliance. May include random, unannounced site visits.	3/1/15 - ongoing	3/1/15 - ongoing	
Implementation of a transition plan will be developed for those needing to transfer to an appropriate HCB setting. Individuals will be given timely notice and a choice of alternative providers. Transition of individuals will be tracked to ensure successful	6/1/15 - 12/31/15	6/1/15 - 12/31/15	

placement and continuity of service.			
Ensuring a Quality System			
All rules, policy and procedures, standards and other documents are revised to reflect HCB Setting Rule.	Completed 10/31/14	Completed 2/1/15	
Service definitions are modified to reflect qualities of an HCB setting.	Completed 10/31/14	Completed 2/1/15	
The provider enrollment process is reviewed to collect information on the proposed service setting to ensure it comports with the HCB Setting Rule.			
Specific quality assurance and improvement strategies are developed to ensure providers are evaluated against the HCB setting rule prior to enrollment and continuing.			
Practical performance measures are created to ensure providers continue to meet the HCB setting rule.			
A participant survey is developed to be administered at least annually to monitor the individual's experience with the HCB Setting Rule.			

Stakeholder Engagement			
Action Step	CSoC	1915(i)	Comments
Convene Interagency group to manage planning process.	9/22/14 and continuing	9/22/14 and continuing	A formal workgroup between the Offices was convened and will continue on an ad hoc basis until the transition plan ends.
Identify all potential stakeholders including consumers, providers, family-members, state associations; advocacy organizations, and self-advocates.	All stakeholders identified on 10/31/14	All stakeholders identified on 10/31/14	
Create portal on State Medicaid website. Provide transition information and plan. List end of comment period	Website created on 9/30/14. Issued white paper and transition plan. Public notice appeared in major newspapers on 10/10/14. Comments due 11/10/14	Website created on 9/30/14. Issued white paper and transition plan. Public notice appeared in major newspapers on 10/10/14. Comments due 3/16/15.	Website has been kept current reflecting meeting notices and transition planning progress.
Ongoing stakeholder communications	Held public forum on 11/17/14. Presented information about the new HCB setting at the following: 1) 9/29 Statewide Coordinating Council; 2) 10/22/14 CSoc Governance Board meeting; 3) 10/23/14 Affinity call with CSoc Wraparound Facilitators, & 4) 11/3/14 Louisiana Behavioral Health Advisory Committee. Update website as needed.	Hosting 3 webinars tentatively the second and third weeks of February.	
Reach-out to providers and provider associations to increase understanding of rule and maintain open lines of communication.	Distribute letters to providers describing the transition, criteria for HCB setting, deadlines for compliance and availability of TA. Begin 3/1/15 and ends 4/1/15	Distribute letters to providers describing the transition, criteria for HCB setting, deadlines for compliance and availability of TA. Begin 3/1/15 and ends 4/1/15	
Create method to track and respond to public comments.	Created spreadsheet to track comments.	Created spreadsheet to track comments.	
Release draft transition plan to the web portal for public comments. Publicize 30 day end period.	Stakeholders provided notice on 9/30/14. Comment period ran through 11/10/14	Draft released 1/26/15.	

Collect all public comments. Synthesize comments and develop responses to comments. (Will go into transition plan for CMS).			
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