

Louisiana Office of Aging and Adult Services
Response to Comments Received for the HCBS Settings Rule Transition Plan

	Comment	Response	Transition Plan Reference
1.	We request that columns be added to the plan that show (1) the date that items are completed; and (2) where and how the public can obtain full information on the results of the action items, including any documents that relate to the items.	Columns were added to the transition plan for activity dates as requested. Once completed, results of each action item will be posted to the OAAS website.	Throughout
2.	We suggest that a single assessment be used for all providers, especially if providers are expected to perform self-assessments. In addition, the assessment instruments and instructions should be made available for public comment prior to use, and should be piloted so that the quality of the information generated can be assessed.	OAAS will use a single self-assessment tool to initially assess compliance with providers. The assessment and instructions will be posted on the OAAS website and made available for public comment. The self-assessment tool was created using guidance released by CMS for non-residential HCBS settings and revisions were made with ADHC providers in mind.	Pages 3-4 ID: B6-7
3.	In the current draft plan, there does not appear to be training for providers and support coordinators that will fully explain the HCBS federal rule and the compliance qualifications for providers.	OAAS has added an action step to its transition plan to allow for provider training and education.	Pages 1-2 ID: A6, A10
4.	It is noted that when Louisiana transitions long-term services and supports to a managed care delivery system, the managed care organization will be expected to verify, monitor, and report on provider's compliance with the HCBS federal rule. However, we would also suggest penalties for providers that are consistently noncompliant, and for MCOs that neglect to identify noncompliant providers.	Provisions for provider non-compliance will be built into each MCO's contract and will allow for sanctions and contract termination with the provider if continued non-compliance is not remediated. An action step was included in the transition plan for this along with a transition plan describing how OAAS will ensure continuity of services for any affected participants.	Pages 5-6 ID: C5, C7
5.	Individuals receiving ADHC services and their families should be surveyed, both in writing and over the phone, using an instrument that is made available for public comment prior to use.	OAAS has added an action step in the transition plan to allow for in-person interviewing of participants (and family members when appropriate) during its quality monitoring period for its 1915(c) waivers. OAAS monitoring staff will conduct the surveys/interviews on a representative sample of its participants.	Page 4 ID: B12; Page 6 ID: C11
6.	Focus groups should be held at ADHCs where the recipients of that service and their family members can explain how the service could be changed to better meet their needs, and what other services should be offered to expand individual choice. Specific plans for these focus groups and surveys should be incorporated in the transition plan.	OAAS regularly surveys its participants through our quality monitoring and consumer satisfaction/experience of care surveys. Item(s) will be included on the participant survey to capture participant suggestions on how services could be changed to better meet their needs and what services could be offered to expand participant choice.	Page 4 ID: B12; Page 6 ID: C11
7.	We believe the transition plan should include provisions for meeting with providers and advocates together to assist in assuring that changes made in regulations will increase the availability of quality providers.	OAAS will reach out to and invite advocates to its provider meeting referenced in the response to comment #3.	Pages 1-2 ID: A6