

Progress Tracking for Louisiana Statewide Transition Plan 2015 Q4

I. Louisiana Office of Aging and Adult Services

A. OAAS Update to Louisiana Work Plan Master

Action Step	Date(s) and Status	Plan Update Narrative
Convene interagency group to manage planning process	9/22/14 ongoing	<p>Meetings were held on the following dates to discuss transition plan action steps and revisions to the transition plan requested by CMS: 10/20/15, 10/26/15, 10/28/15, 11/13/15*, 11/15/15, 11/16/15, 11/20/15*, 12/1/15*, 12/4/15, 12/7/15*, 12/9/15, 12/11/15*, 12/14/14, and 12/16/15*.</p> <p>* Interagency STP Workgroup Meetings to discuss responses to CMS and revise the STP to meet CMS requirements. Included in these meetings were discussions to coordinate timelines where possible.</p>
Develop and update website on a regular basis on external stakeholder comments	10/1/14 - ongoing	<p>The OAAS website is continually updated with new or revised documents to reflect actions and work completed towards the transition plan.</p> <p>Medicaid submitted the response letter to CMS along with the revised transition plan documents on 12/18/15. The OAAS transition plan website was updated to include these documents for public and stakeholder review.</p>
Review licensure, certification, policy and procedures,	11/16/15 –	Per CMS request, OAAS expanded upon previous systemic

and provider qualifications	12/11/15 Complete	settings assessment (e.g. policy crosswalk) previously completed 11/30/14. The assessment consisted of a full review of all waiver rules, policies and procedures, and licensing/certification requirements.
Provide training on participant survey*	1/4/16 – 2/29/16* Scheduled in revised STP	OAAS monitors will receive training to complete the new participant survey module during the participant interview portion of OAAS’ 1915(c) quality monitoring in preparation for the next monitoring period beginning in January 2016. *Previously scheduled to begin 11/1/15 but was pushed to early 2016 when timelines were adjusted in the revised transition plan.
Develop monitoring instrument to ensure setting compliance.	6/1/15 Ongoing	Timelines for developing monitoring instruments were adjusted in the revised transition plan: - Participant surveys will be developed by 1/11/16 - Site assessment tool will be developed by 1/29/16 - Questions will be added to the SC Contact Documentation form for SCs to complete during their quarterly, face-to-face visit with participants to monitor for setting compliance.
Conduct site visits*	2/1/16 – 6/30/16* Scheduled in revised STP	OAAS will begin conducting site visits of its providers beginning in late October 2015. *Previously scheduled to begin 7/1/15 and conclude 12/31/15 but dates were pushed back after receipt of CMS’ response to transition plan to allow for revisions. Timelines were adjusted in revised transition plan

B. OAAS Public Comments Received 10/1/15 – 12/31/15

N/A – no comments sought or received by OAAS during Q4, 2015

C. OAAS Summary of Comments: N/A

II. Louisiana Office for Citizens with Developmental Disabilities

A. OCDD Update to Louisiana Work Plan Master

Action	Date(s) and Status	Plan Update Narrative
Convene Interagency group to manage planning process	9/22/14 and continuing	<p>12/31/2015 Update:</p> <ul style="list-style-type: none"> • 10/13/2015—Presented information and answered questions regarding the HCBS rule changes to the Executives of the ARC quarterly meeting • 10/27/2015-State Use Council meeting discussing changes being made to the workshops and integration of rule from CMS and how it will affect the program • 11/30/2015-Finalizing draft MOU with LRS and OBH • 12/2/2015-LC Vocational Provider Meeting to answer questions along with LRS • The STP workgroup met on 11/13; 11/20; 12/1; 12/4; 12/7; 12/11; and 12/16 to discuss responses to CMS and revise the STP to meet CMS requirements. Included in these meetings were discussions to coordinate timelines where possible. • 12/18-Updates regarding transition plan and status given to the Provider Association Group
Support ongoing stakeholder communications	11/2014-ongoing	<p>12/31/15 Update:</p> <ul style="list-style-type: none"> • 10/6/2015—Employment Roundtable in Lafayette • 10/7/2015—Employment Roundtable in Region 3 • 10/8/2015—OCDD staff attended opening of Options new program in Hammond. This is where they rolled

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		<p>out their “volunteer” program and their “arts” program in the community-it was held at the Theatre in Hammond</p> <ul style="list-style-type: none"> • 10/15/15-Alexandria Employment Roundtable • 11/16/2015-Received questions from a vocational provider group regarding changes • 11/17/15-Visit to LADD and CARC in Region 6 • 11/24/2015-Phone call with WARC in region 8 and the LGE office to answer questions regarding changes to waiver application • 11/30/2015-SW training with providers to discuss the changes being made to SW which are moving us toward compliance with settings rule • 12/3-4/2015-Attended LA APSE conference to learn more about WIOA changes • 12/11/15-Meeting with JPHSA (LGE office) regarding pairing with them to complete validation visit and assist selected provider with completing a transition plan to come into compliance <p>OCDD will continue to provide technical assistance to all service provider agencies as requested (will partner with LGE offices where appropriate)</p>
Collect all public comments. Synthesize comments and develop responses to comments (Will go into transition plan for CMS).	Ongoing	12/31/15-No comments received during this quarter
Review licensure, certification, policy/procedure and provider qualifications	10/1/14 – 10/31/14	A crosswalk chart was developed to identify the CMS specific requirements, documents reviewed, and results of the review. This information was incorporated in the STP and was submitted to CMS with the revised STP and LA Response to CMS Feedback letter 12-18-15.

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Based on crosswalk outcomes of all licensing, certification, policy/procedures, and provider qualifications address any areas of concern to strengthen language to align with CMS rule	Crosswalk completed 12/2015 Complete 12/31/2016	OCDD believes that these areas are not in conflict with the settings rule; however, the office does acknowledge there may be areas that language could be strengthened to align with CMS expectations. We will initiate processes to update identified areas beginning in 2016 with the intent to complete this by the end of 2016
Prepare list of settings subject to new rule. Classified as: 1. Clearly meets HCBS settings rule 2. With modifications, will meet new settings rule 3. Meets CMS close scrutiny review 4. Unclear if new setting rule will be met	12/2015*	The settings analysis was updated to reflect settings not services. This information was incorporated in the STP and was submitted to CMS with the revised STP and LA Response to CMS Feedback letter 12-18-15.
Provider assessments due to LGE offices	9/30/2015 1/1/2016*	12/9/2015—Based on feedback from the LGE offices not all providers have complied with submission of their assessments. OCDD will work partner with LGE offices to draft another communication to providers explaining the process and how to submit where and how to submit assessments. In addition to this a tracking mechanism has been developed to assure that each LGE office to identify all service providers in their area and the submission of their self-assessments. <ul style="list-style-type: none"> • Follow up strategies will be developed to assure that all assessments are received
OCDD to provide LGE offices with sample of service provider agencies for review	12/31/2015*	Per CMS feedback, OCDD has drafted a document detailing the office's intent related to sampling methodology, site validation, data validation, etc. Document was incorporated into CMS response as well as the STP. OCDD will pull a random sample for all agencies providing the following services:

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		<ul style="list-style-type: none"> • Residential <ol style="list-style-type: none"> 1. S5125-IFS type services (day, night, shared, family support, community living supports) 2. S5136-SIL 3. S5140-Host Home/Substitute family care • Non-Residential <ol style="list-style-type: none"> 1. T2014-Prevocational services/Employment Related Training 2. T2019-Habilitation Supported Employment 3. T2020-Day Habilitation 4. H2023-Supported Employment Individual Job 5. H2024-Individual Job Self-Employment or 6. H2025-Supported Employment Mobile Crew 7. H2026-Group Employment <p>OCDD intends to pull a 10% site visit sample for Residential providers and 10% desk audit sample for each area of the state. OCDD has 10 LGE offices and each area will be given the sample for their area.</p> <p>OCDD intends to pull a 10% site visit sample for Non-Residential providers and 10% desk audit sample for each area of the state. OCDD has 10 LGE offices and each area will be given the sample for their area.</p> <p>Discretion built into the process so that the LGE office may conduct additional sites should they deem it appropriate.</p>
<p>Continuous scrutiny will be provided to licensing, certification policy/procedures, and provider qualifications to ensure all documents remain compliant with HCB setting rule.</p>	<p>12/2015-ongoing</p>	<p>OCDD intends to evaluate through regular processes (i.e., waiver amendments, renewals, etc.) areas that could be enhanced. Moving forward as the State implements initiatives and updates existing processes these areas will be evaluated and updated as appropriate.</p>

B.OCDD Public Comments Received 10/1/15 – 12/31/15

No Public Comments were received.

C. OCDD Summary of Comments Received 10/1/15 – 12/31/15

N/A

III. Louisiana Office of Behavioral Health

A.OBH Update to Louisiana Work Plan Master

Action	Date(s) Status	Plan Update Narrative
Convene interagency group to manage planning process	9/22/14 ongoing	<p>Interagency STP workgroup meetings were held on the following dates to discuss responses to CMS and revise the STP to meet CMS requirements: 11/13/15, 11/20/15, 12/1/15, 12/7/15, 12/11/15, and 12/16/15. Included in these meetings were discussions to coordinate timelines where possible. The following indicates the timelines adjusted:</p> <ul style="list-style-type: none"> -- Distribution of provider assessment tool and member surveys will begin 2/1/16. -- Site visits will begin on 2/1/16. -- Findings will be posted to the website by 7/18/16. -- Report will be submitted to CMS by 8/1/16.
Review licensure, certification, policy and procedures, and provider qualifications	12/1/15 – 12/11/15 Complete	Per CMS request, OBH completed an expanded review of the systemic settings assessment (e.g. policy crosswalk). The assessment consisted of a full review of all waiver rules, policies and procedures, and licensing/certification requirements.
Draft self-assessment tool and participant survey	12/22/15 Complete	OBH worked with the CSoC contractor (Magellan) to revise the HCBS Setting Rule white paper, which includes a summary of the rule and transition plan, and lists proposed questions for the provider assessments and member surveys.
Post assessment and survey to website	12/22/15 Complete	The revised white paper was posted to the OBH and Magellan websites.
Revise the provider enrollment/re-enrollment process to collect information from provider applicants/providers to	12/1/15 forward	

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ensure their proposed setting/current setting meets the HCBS setting requirements		
Revise the participant enrollment process to collect information from potential participants to determine if they reside in a prohibited setting	12/1/15 forward	
Revise the participant plan of care process to collect information to ensure current participants still reside in an approved setting	12/1/15 forward	Wraparound Facilitators will collect information reported by participants at least quarterly. Instances which do not comply with the HCB setting rule will be assessed by OBH to determine the best treatment for the participant.

B. OBH Public Comments Received 10/1/15 – 12/31/15

No comments were received.

C. Summary of Comments: N/A