

# Progress Tracking for Louisiana Statewide Transition Plan 2016 Q3

## I. Louisiana Office of Aging and Adult Services

### A. OAAS Update to Louisiana Work Plan Master

<b>Public &amp; Stakeholder Engagement</b>		
<b>Action Step</b>	<b>Date(s) and Status</b>	<b>Plan Update Narrative</b>
Convene interagency group to manage planning process	Began 9/22/14 and continuing through 3/2019	<p>Meetings were held on the following dates to discuss transition plan action steps and revisions to the transition plan requested by CMS: 07/05, 07/12*, 07/13*,07,19*, 07/20*, 07/22, 07/25, 07/26,07/27, 08/2*, 08/03*, 08/04*, 08/05,08/08,08/09, 08/10,08/11*, 08/23, 08/24*,08/25, 08/30, 08/31*,09/01, 09/06*,09/10,09/12, 09/19, 09/20, 09/26</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	10/01/14 – 3/20/19	<p>The OAAS website is continually updated with new or revised documents to reflect actions and work completed towards the transition plan.</p> <p>Program Offices posted an updated Work Plan Master on their respective websites for public comment on 09/13/16.</p> <p>The OAAS transition plan website was updated to include these</p>

		documents for public and stakeholder review.
Support ongoing stakeholder communications.	11/19/14-3/20/2019	Held public forum (including OAAS stakeholders) on 11/19/14 and continuing as needed through 3/2019. Stakeholders are informed of STP's progress through provider association meetings, OAAS quarterly provider meetings, and support coordination executive meetings.  Website updated 9/13/16 with changes to Louisiana Work Plan Master.
Reach-out to providers and provider associations to increase understanding of rule and maintain open lines of communication.	3/13/15-02/2017	Provider outreach continued through September 2016 for Louisiana Work Plan Master public comment and will continue through February 2017 to complete validation and remediation work.
Collect all public comments. Synthesize comments and develop responses to comments.	11/13/14 - 10/14/16	Second round of public notice: 9/14/16-10/14/16. Responses to comments and incorporation into STP will be completed by 10/30/16. The public notice of the Louisiana Master Plan was made available in electronic and non-electronic format.
Continued Community Outreach	Began 9/22/14 and continuing through 3/2019	Continue to meet with participants, family members, providers, support coordinators, and stakeholders, and providers to provide updates on the progress of STP activities. Contact methods include provider quarterly meetings, support coordinator executive meetings, conferences, correspondence, website updates , newspaper announcements and general meetings.
<b>Systemic Assessment &amp; Remediation</b>		
Review licensure, certification, policy and procedures, and provider qualifications	11/16/15-9/1/16	Crosswalk revised 7/22/16 and 9/1/16 incorporating guidance from CMS (See Louisiana Statewide Transition Plan Appendix B for systemic review).

<b>Ongoing Monitoring &amp; Quality Assurance</b>		
Continuous scrutiny will be provided to licensing, certification, policy and procedures, to ensure all document are compliant with the HCBS Settings Rule.	Completed 9/1/16	OAAS completed its systemic assessment of all licensing, certification, policy and procedures on 9/1/16. The systemic assessment was submitted with final Louisiana State Transition Plan. OAAS will continue to scrutinize existing or new amendments to rules and regulations to ensure compliance with the HCBS Settings Rule.
Develop monitoring instrument to ensure ongoing setting compliance.	Begins 8/1/15 and ends 11/30/16.	<p>A site visit tool was developed to monitor ADHC HCBS Setting compliance in September 2016. ADHC Site visits will begin in Quarter 4, 2016.</p> <p>The non-residential provider site visit tool is available at the following link:  <a href="http://dhh.louisiana.gov/assets/docs/OAAS/publications/HCBS/Site-Specific-Assessment-Validation-Non-Residential.pdf">http://dhh.louisiana.gov/assets/docs/OAAS/publications/HCBS/Site-Specific-Assessment-Validation-Non-Residential.pdf</a></p>

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**B.OAAS Public Comments Received 7/1/16 – 9/30/16**  
**No Public Comments were received.**

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**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 through 3/2019	<p><b>9/30/2016 Update</b></p> <p>Cross office workgroup met on the following dates to address feedback and revisions needed to the STP: 7/13/16, 7/20/16, 7/27/16, 8/3/16, 8/10/16, 8/31/16, 9/6/16 and 9/7/16</p>
Support ongoing stakeholder communications	11/2014 and ongoing through 3/2019	<p><b>9/30/2016 Update</b></p> <ul style="list-style-type: none"> <li>• OCDD has begun holding monthly provider calls. Invited to participate in these meetings are all service providers, support coordination agencies, and the Local Governmental Entities (LGE) offices. Agenda items are determined based on feedback from stakeholders as well as areas that OCDD needs to provide updates on. Questions are submitted via email prior to and post meeting. OCDD responds to these questions and posts responses after the meeting. The Statewide Transition Plan was included on the agenda for both the 7/7/16 meeting and the 9/1/16 meeting. OCDD provided an overview of progress on revisions, when stakeholders could anticipate posting of document for review, and responded to questions received prior to calls. See below stakeholder questions and responses for additional information regarding this area.</li> <li>• 7/20/2016-presented updates at the DD Council meeting with a focus around employment. Presented overview</li> </ul>

Action	Date(s) and Status	Plan Update Narrative
		<p>of the regulation and Louisiana’s approach to evaluating compliance and progress in terms of revision to STP and process to come into compliance. Present for this meeting were advocates, self-advocates, family members, provider representatives, and OCDD staff.</p> <ul style="list-style-type: none"> <li>• ARC of Louisiana Council of Execs meeting to discuss employment, day habilitation, and prevocational services and impact of CMS rule on those programs</li> <li>• Meetings with potential members of State Use Program</li> <li>• American Association on Intellectual and Developmental Disabilities (AAIDD) conference presentation on CMS rule</li> <li>• Meeting with LRS – updates on WIOA</li> </ul> <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).	Begin 9/2014 and ongoing through 3/2019	<p><b>Update 9/30/16:</b> Comments/questions and the State’s responses received for the July call can be found by clicking the following link and information is on page 2  <a href="http://new.dhh.louisiana.gov/assets/docs/OCDD/waiver/NO%20W/Q&amp;AforProviderCallUpdated08292016.pdf">http://new.dhh.louisiana.gov/assets/docs/OCDD/waiver/NO W/Q&amp;AforProviderCallUpdated08292016.pdf</a></p>
<b>Program Review and Assessment</b>		
Provider assessments due to LGE offices.	9/30/15 Adjusted timeframe- 2/5/2016	<p><b>Update 9/30/16</b></p> <p>There is approximately 5% of Residential and 5% Non-Residential providers that have not submitted their self-</p>

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		assessments. OCDD will be partnering with the LGEs to follow up on these agencies and take appropriate action.
Conduct site visits.	1/1/16 – 3/31/17*	<b>Update 9/30/16</b> There is approximately 5% of Residential and 5% Non-Residential providers that have not submitted their self-assessments. OCDD will be partnering with the LGEs to follow up on these agencies and take appropriate action.
Analysis of findings from site visits and assessments	6/1/16 – 4/30/17*	Beginning the process of analyzing the information; however, as noted previously additional validation to be completed, thus timeframe for this activity was extended.
Participant survey due	7/15/16 Completed first phase 3/31/17* for next phase	<b>Update 9/30/16</b> —Support Coordination continues to complete individual experience surveys with individuals supported by HCBS programs.
Analysis of other available OCDD participant data (NCI results)	7/15/16 – 3/31/17*	<b>Update 9/30/16</b> -OCDD intends to look at data available to compare overall results; however, since the data is not able to be cross walked to a specific provider it will only be able to be used from a comparison perspective.
Analysis of findings from preliminary assessment process	6/1/16 - 3/31/17*	<b>Update 9/30/16</b> -Systemic Review of rules, licensure, etc. completed and ready to be posted for public review and submitted to CMS by 10/31/16 (extension requested due to flooding in areas of the state of Louisiana). All other assessment activities (site specific visits and validation activities will be completed by March 2017)
Draft report of findings	7/1/16 - 3/31/17*	<b>Update 9/30/16</b> -Systemic Review of rules, licensure, etc. completed and ready to be posted for public review and

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		submitted to CMS by 10/31/16 (extension requested due to flooding in areas of the state of Louisiana). All other assessment activities (site specific visits and validation activities will be completed by March 2017)
Post report of findings on website and circulate for stakeholder feedback	8/15/16* - 9/15/16* Systemic review information posted 9/14/16*  All other results will be posted 6/1/2017*	<b>Update 9/30/16</b> -Systemic Review of rules, licensure, etc. completed and ready to be posted for public review and submitted to CMS by 10/31/16 (extension requested due to flooding in areas of the state of Louisiana). All other assessment activities (site specific visits and validation activities will be completed by March 2017)
Respond/address stakeholder input	10/14/16* for Systemic Review  6/30/17* all other activities associated with Site specific visits/ validation	<b>Update 9/30/16</b> —no comments received.
<b>Ensuring Providers are Compliant/Remediation</b>		
Providers who are not in compliance and wish to remain enrolled as waiver providers will submit a transition plan (corrective action plan). Non-compliance may not extend beyond March 17, 2019	1/1/16 - 5/31/17*	<b>Update 9/30/16</b> -As per recent STP submission, OCDD had a very low percentage of providers self-reporting the need for a transition plan. Validation visits completed in phase I of OCDD's process has identified additional providers that need to complete a transition plan. OCDD is planning to conduct

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		additional training/technical assistance related to transition plans for providers, thus the timeline will be extended in order to better equip providers with necessary information to complete the process. In addition to the above, OCDD will embark on phase 2 of site specific visits and validation via the individual experience survey results that will likely result in providers having to complete transition plans. For this reason, OCDD will allow for submission of transition plans as identified with a completion date of no later than 3/2017.
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.	12/1/16 Reports will be due at least quarterly Completion date will not extend beyond 3/17/19	<b>Update 9/30/16-</b> Due to multiple issues during the quarter, OCDD was not able to schedule refresher training. Focus during this quarter has been on needed revisions to the STP to address feedback/recommendations provided by CMS. In addition to the above, some parts of the state experienced flooding during this timeframe diverting most of our resources to addressing issues related to this with persons served within our programs.
<b>Ensuring a Quality System</b>		
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	1/1/16 - 12/31/17*	<b>/30/16 Update:</b> Based on recent revisions to the STP and discussions related to systemic review, OCDD intends to have all updates needed to rule, policy, manuals, etc. completed by December 2017.
Evaluate current plan of care format/process, rights/responsibilities, other waiver forms and update as appropriate to align with the rule	3/14/16 - 12/31/17*	<b>Update 9/30/16-</b> Stakeholder group comprised of Support Coordination representatives, LGE representatives, Provider Group representatives, and OCDD central office staff have agreed to continue meeting on a regular basis in order to discuss necessary modifications/training needed regarding the person centered planning process, guidelines for planning document, and other areas associated with planning in an effort to improve



Action	Date(s) and Status	Plan Update Narrative
		the service delivery system as well as incorporate identified areas to align with CMS regulation. This group met on 8/1/2016.
Practical performance measures are created to ensure providers continue to meet the HCB Settings rule	1/1/16 - 6/30/17*	<b>Update 9/30/16</b> -Adjusted timeline to account for changes needed in other waiver applications related to this area.

## B.OCDD Public Comments Received 7/1/16 – 9/30/16

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For comments/questions and the State’s responses received for the July 7, 2016 Provider call, see the following website:

<http://new.dhh.louisiana.gov/assets/docs/OCDD/waiver/NOW/Q&AforProviderCallUpdated08292016.pdf>

## C. OCDD Summary of Comments Received 7/1/16 – 9/30/16

Questions included the following issues relative to compliance with the HCBS Settings Rule: changing providers; encouraging supported employment; participant rights v. family wishes.

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### III. Louisiana Office of Behavioral Health A.OBH Update to Louisiana Work Plan Master

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Action	Date(s) Status	Plan Update Narrative
Convene interagency group to manage planning process	Began 9/22/14 and continuing through 3/2019	OBH participated in HCBS TA webinars and interagency STP workgroup meetings.
Support ongoing stakeholder communications	Updated 9/13/16	Revised STP emailed to CSoC stakeholders and providers, and posted to website for public comment.
Review licensure, certification, policy and procedures, and provider qualifications	Updated 7/22/16	OBH updated the systemic assessment to include a list of regulations, administrative procedures, service manuals, and policy documents that provide guidance and directives for the services included in the Coordinated System of Care (CSoC).
Distribute participant/member survey.	Began 3/1/16 and ongoing through 2/28/17	Magellan distributed the member survey to the WAAs on 2/26/16. Through the monitoring process, WAAs will work with participants to distribute and complete the surveys through 2/28/17.
Conduct site visits	Began 3/1/16 and ongoing through 2/28/17	<p>In Q3, Magellan CSoC Coordinators reviewed 138 member records to ensure compliance with the HCBS requirements. Of those 138 records, all 138 members showed compliance with HCBS requirements for a compliance rate of 100%.</p> <p>In Q3, Magellan reviewed 19 waiver providers for credentialing/re-credentialing. All 19 providers showed compliance with all elements of the provider survey and credentialing process. Magellan also conducted 5 onsite audits.</p>

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B. OBH Public Comments Received 7/1/16 – 9/30/16: No public comments were received in 2016 Q3.

C. Summary of Comments Received: 7/1/16 – 9/30/16: N/A

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