

Georgia Home and Community Based Services (HCBS) Transition Plan -- Elderly and Disabled (E&D) Waiver

Section 1. Identification						
<i>Action Item</i>	<i>Description</i>	<i>Start Date</i>	<i>End Date</i>	<i>Sources</i>	<i>Key Stakeholders</i>	<i>Intervention/ Outcome</i>
Obtain active provider breakdown by site	State identifies HCBS service provider listing by site to include contact information and service by site using category of service.	7/1/14	7/15/14	Department of Community Health (DCH) Decision Support Services (DSS) system	Division of Aging Services (DAS), DCH Policy and information technology unit	Consolidated and verified HCBS Setting Inventory unit
Development of Provider Self-Assessment tool	State develops self-assessment tool for providers to evaluate conformity to and compliance with HCBS rules.	7/1/14	7/31/14	HCBS guidance, State developed assessment tools (Iowa/Nevada), CMS Guidance	DCH Policy Unit, DAS, Elderly and Disabled Provider Network, SOURCE Quality Committee, Care Coordination	Assessment tool vetted by key stakeholders
Submit E&D Waiver Amendment	Submit Waiver Amendment to Centers For Medicare and Medicaid Services (CMS) following public comment period on transition plan.	7/1/14	8/15/14	CMS Waiver Document	DCH Policy Unit, DAS, Elderly and Disabled Provider Network, SOURCE Quality Committee, Care Coordination	Initial E&D Waiver Amendment
Test and refine Assessment tool	Pilot self-administration of tool to ensure it adequately captures needed elements and is easily and accurately completed by providers.	8/1/14	8/15/14	HCBS guidance, public input, key stakeholder input	G4A, SOURCE Quality Committee	Validated tool
Other standards identification	Design with stakeholder input a comprehensive set of provider standards (credentialing, licensing, policies, training curricula, etc.) to be reviewed and validated to conform to HCBS rule.	8/16/14	8/31/14	Key stakeholder input, existing provider standards	DCH Policy Unit, DAS, SOURCE Quality Committee, DCH Provider Enrollment, DAS Provider Enrollment	Provider Standards for enrollment and continued participation
Design electronic tool	Develop electronic version of tool for efficient collection	8/16/14	8/31/14	Contracted DCH IT tool	DCH Policy Unit, DCH IT, DAS IT, and DSS experts	Electronic tool

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	and analysis of data.					
Incorporation of Assessment tool into Provider enrollment policy and application	State incorporates self-assessment requirement into provider enrollment and policy at DCH and DAS.	9/1/14	10/1/14	HCBS Guidance, Healthcare Facility Regulations, Existing provider enrollment policy at DCH and DAS	DCH Policy Unit, DAS, Elderly and Disabled Provider Network, SOURCE Quality Committee, Care Coordination	Expectations for compliance are clearly outlined in Policy

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Section 2. Assessment						
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Enrolled active HCBS Providers complete self-assessment	All active enrolled HCBS providers will submit the provider self-assessment tool to DCH.	9/1/14	10/31/14	Assessment Tool, HCBS Provider Network staff	DCH Policy Unit, DAS, Elderly and Disabled Provider Network, SOURCE Quality Committee, Care Coordination, Provider organizations	100% of HCBS providers complete self-evaluation
Other standards Assessment	Assess what changes are required to update provider qualification standards, licensure regulations, enrollment education and provider training, and other related policies, etc. to conform to HCBS rule.	10/1/14	12/31/14	Key stakeholder input, existing provider standards	DCH Policy Unit, DAS, SOURCE Quality Committee, DCH Provider Enrollment, DAS Provider Enrollment	Provider Standards for enrollment and continued participation
Self-assessment data is compiled and analyzed	DCH Policy Unit compiles the self-assessment data to determine those HCBS services providers who meet, do not meet, and could come into compliance with HCBS guidance.	11/1/14	12/31/14	Self-assessment tool, Sharepoint	DCH Policy Unit, DAS	Report of findings and augmented Setting inventory to include compliance status
Case management entities validate a representative sample of self-assessments	Care coordination and SOURCE case management agencies validate a state determined percentage of provider self-assessments for validity.	11/1/14	11/30/14	Self-assessment tool, SOURCE case managers, Community Care Services Program (CCSP) Care Coordinators	DCH Policy Unit, DAS, SOURCE Case management agencies, CCSP Care Coordinators, Direct Service Providers	Minimum 5% random sampling of assessment data collected to test reliability
Validated self-assessment data	Initial assessment data compared to validation data.	12/1/14	12/31/14	Self-assessment tool, Sharepoint	DCH Policy Unit, DAS	Report of finding, accuracy, and

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is compiled and analyzed	DCH Policy Unit compiles the self-assessment data to determine those HCBS services providers who meet, do not meet, and could come into compliance with HCBS guidance.					reliability of tool and outcome data.
Assessment Results and Report Presentation	State will formally present the results of the assessment data to stakeholders and post on relevant websites.	1/1/15	1/31/15	Self-assessment tool, Sharepoint, data analysis	DCH Policy Unit, DCH Communications, DAS	Public distribution/ awareness of the state of the state of HCBS setting compliance

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Section 3: Remediation						
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Comprehensive Transition Plan	Develop a Transition Plan package to include a project management plan and narrative white paper that summarizes the state of the state at the end of the initial assessment period, establishes a plan for comprehensively addressing all components of compliance with HCBS rule and describes the state's related mission and values.	7/1/14	12/31/15	Assessment results, key stakeholder input results, waiver document	Members, Advocacy Groups, DCH Policy Unit, DAS, Elderly and Disabled Provider Network, SOURCE Quality Committee, Care Coordination	Fully developed statewide transition plan
Submit Waiver Plan Amendment to CMS	DCH will submit a waiver amendment that outlines remediation strategies for those HCBS providers not in compliance with HCBS regulations.	12/1/14	12/31/14	Assessment results, key stakeholder input results, waiver document	DCH Policy Unit, DAS, SOURCE Quality Committee	Waiver amendment with fully developed remediation strategy
Policy Development	State will develop revised policies and procedures to address ongoing monitoring and compliance.	1/1/15	3/31/15	DCH and DHS Legal	Members, Advocacy Groups, DCH Policy Unit, DAS, Elderly and Disabled Provider Network, SOURCE Quality Committee, Care Coordination	Establish adverse action and appeals processes applicable to providers who fail to comply with HCBS rule
Other standards Remediation	Design, adopt, and implement plan for achieving comprehensive compliance of provider	1/1/15	6/30/15	Key stakeholder input, existing provider standards	DCH Policy Unit, DAS, SOURCE Quality Committee, DCH Provider Enrollment,	Provider Standards for enrollment and continued

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	standards with HCBS rule (credentialing, licensing, policies, etc.)				DAS Provider Enrollment	participation
Provider Training and Education	Design and implement plan for incorporating necessary training and education into provider enrollment orientation and provider employee training AND provide training to providers on implementation	1/15/15	6/30/15	Key stakeholder input, existing provider standards	DCH Policy Unit, DAS, SOURCE Quality Committee, DCH Provider Enrollment, DAS Provider Enrollment, Provider network	Educated providers on new rule
Ongoing Monitoring of compliance	State will incorporate HCBS requirements into policy and consumer satisfaction surveys to identify areas of non-compliance.	02/15/15	Ongoing	DCH policy manuals, Consumer satisfaction surveys	DCH Policy Unit, DCH Program Integrity, DAS	Ongoing Program Integrity and Provider Compliance Audits

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Section 4: Outreach and Engagement						
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Initial plan developed	Immediate stakeholder input gathered to adjust this originally drafted plan.	6/23/14	6/30/14	CMS written guidance and TA; DCH staff	DCH Policy Unit, DAS, SOURCE Quality Committee	Consensus and adoption of initially proposed plan methodology
Public Notice-- Assessment Plan Review	DCH makes public notice through multiple venues to share overarching Transition Plan and proposed method of assessment per HCBS guidance including banner messaging, website posting, regional Medicaid office postings in conjunction with immediate waiver amendment to incorporate additional slots, rate increases, and quality incentive program.	07/3/14	08/3/14	Section 1 of Proposed HCBS Transition Plan	Members, Advocacy Groups, DCH Policy Unit, DAS, Elderly and Disabled Provider Network, SOURCE Quality Committee, Care Coordination, Provider organizations	Public Notice with transition plan
Public Comment-- Transition Plan	DCH commences collection of public comment through multiple methods and makes appropriate changes to assessment tool and plan. Comments will be taken in person, via fax, email, or website submission.	7/3/14	8/3/14	Section 1 of Proposed HCBS Transition Plan	DCH Policy Unit, DCH Communications, DAS	Public notice posted with transition plan
Public Comment-- Collection and plan revisions	DCH incorporates appropriate changes to the initial transition plan based	8/3/14	8/10/14	Section 1 of the Proposed HCBS Transition Plan	DCH Policy Unit, DAS, SOURCE Quality Committee	Completed transition plan

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	on public comments.					
Public Comment-- Retention	DCH will safely store public comments and state responses for CMS and the general public.	8/15/14	Ongoing	Public Comments and State Response documents	DCH Policy Unit	Public comments stored
Posting of revisions to initial document	DCH will post the rationale behind any substantive change to the transition plan.	8/10/14	Ongoing	Public Comments and State Response documents	DCH Policy Unit, DCH Communications	Posted rationale
Stakeholder training and education	Design, schedule, and conduct training for individual recipients of waiver services, their families and similarly situated stakeholders on waiver compliance, changes they can expect to see and which will affect their services.	9/1/14	4/30/2015	Statewide Transition Plan and resulting products	Members, Families, Advocates	Member understanding of changes to expect
Public Comment— Ongoing input	DCH will leverage various stakeholders groups to periodically present and seek feedback to comprehensive Transition Plan development in preparation for Waiver Amendment to incorporate comprehensive plan.	9/1/14	Ongoing	Public Comments and State Response documents	Members, Advocacy Groups, DCH Policy Unit, DAS, Elderly and Disabled Provider Network, SOURCE Quality Committee, Care Coordination, Provider organizations	Public comments for incorporation into policy and regulations