

Final Rule Stakeholder Call

Topic: Transition Plan Posted

11-16-2016

Noon call (96 participants on the line)

1. Can you tell us who the other states are that have initial approval?
 - a. See list: <https://www.medicaid.gov/medicaid/hcbs/transition-plan/index.html>
2. Is there any way to tell what changes were made from this plan to the previous plan?
 - a. Basically we started over, based on the initial response from CMS to the first plan and since we decided to go in a different direction. The original plan is still posted on the KDADS website, you can pull it up and look at it.
3. HCBS provider forums and the lunch & learn calls. Can you expand a bit about the Long Term Care roundtable forum is and who is going to be allowed to attend and what the provider forums are, what kind of setting is going to be in? (Page 10 of the STP)
 - a. Those were done in 2015. If you go to page 11, it starts talking about 2016 activities.
4. What about the Person Centered Service Plan training in January and the December?
 - a. In December, we will take public comment on the transition plan until December 28.
 - b. In January, want to have about 6 of trainings on the Person Centered Service Plan requirements. Dates are not firm yet, but will be after the holidays. This will be to train people about the Person Centered Service Plan requirements specifically.
 - c. Learning collaborative will bring providers together who are coming into compliance.
5. Under the section on the systematic assessment where it talks about waivers reviewed and cross-walked regulations, there is specific information about adult care homes but nothing about HCBS or IDD?
 - a. If you go to page 14 of the plan (the references/resources section), there is a link to the crosswalk.
6. The plan says Residential and support plan policies already been developed. When will be posted?
 - a. The Residential reference is related to the new residential policy that was already posted.
 - b. Person Centered Service Plan will be posted when training is completed, but isn't a policy since it is a regulation. Will have guidance posted.
7. How/when will providers be notified of their compliance with Final Rule?
 - a. Depends on when the on-sites will be completed for Day/Res.
8. If you didn't have an onsite survey, how will you be notified?
 - a. Based on the regulation, and some adult care homes, if there's no site visit, then depending on the setting that you'd be notified your setting would be considered partially compliant and to attend the learning collaborative.
9. When will IDD be notified of onsite visits?
 - a. They will be notified by field staff completing the assessments.
10. When will we be able to get a copy of the checklist for IDD?
 - a. **We can get that.**
11. Will it be on the website or will that be mailed to providers?

- a. On the website
- 12. Will they have to have a policy for each item on the checklist?
 - a. Only if they can't get what they need from observation or record review.
- 13. On-going, new providers have to be in compliance with the rule. I have new providers wanting to onboard. What can I tell them as far as compliance? I'm not sure how to work with them.
 - a. Licensing would work with them when they make their visit. When credentialing a new provider, they'd be in compliance beginning in 2018.
- 14. Is the state looking at including any training to help providers to understanding what person centered what that means that a lot of these checklists happens? The thinking change?
 - a. Yes. That's part of what the collaboratives will be around. We want to bring the providers together to start having them work through the topics. Many states are struggling and CMS is still putting guidance out and nobody is certain of. Talking as a group, figuring out where we're going, how we're viewing that.
- 15. Comment: I think putting things out single provider groups will limit creativity and by leaving space for others outside of that provider space we can be creative and share things we wouldn't have thought of by interacting with our own group.
- 16. The learning collaborative, will it include providers that are also compliant?
 - a. It's interesting because when we're thinking that are partially or non-compliant but when we're thinking about settings we're not thinking individual providers. With some settings we have some unique situations, there's not a group that's non-compliant and a group that is complaint.
- 17. You're talking about the service plan and not the support plan, correct?
 - a. We're going to talk about both as there may be some things that are duplicative so that there's efficiencies for the consumer.
- 18. So is the ISP the same as the support plan or the service plan?
 - a. We're hearing people get confused about the terminology and as part of this, are going to work on some clarity of language.
- 19. Does that mean the PCSP [Person Centered Service Plan] will be completed by the MCOs?
 - a. Yes. It will.
- 20. Will the MCO be completing the PCSP [Person Centered Service Plan] across all waivers including IDD?
 - a. Yes. The TCM will do the support plans.
- 21. What are we calling the plan written by the TCM?
 - a. Person centered support plan – TCM
- 22. Discussion about what to call the different planning documents – agreement to have a later discussion, possibly using plan of care.
- 23. When completing the PCSP [Person Centered Service Plan], is that with input from the provider from the individuals themselves or individually from the MCO.
 - a. The individual drives that and can have anyone involved that they want; the providers specifically agree to provide services. Providers must sign it and agree to provide services. Potentially agree to have a service and support meeting in 1 day. Certainly all come into play.

Evening Call (9 participants on the line)

1. We are an adult daycare provider, had been an HCBS provider for a number of years. We have not had a single referral. We dropped that certification since pay was \$13/hr. Will it affect our licensure if we are not an HCBS provider?
 - a. No. If you are not an HCBS provider, it will not have an impact on that. It is for any setting providing HCBS services.
2. I'm unclear, we're also a PACE provider we also get classified with HCBS providers.
 - a. It's been our understanding it won't be affected, but we have asked CMS and are awaiting response. But, for PACE, the fact that individuals are receiving services in their home or in an assisted living or at your center but it's individualized, we don't see it being a problem. We haven't received any response from CMS on compliance. At this point we don't see it as being problematic.