

State of Montana Home and Community Based Services Settings Transition Plan

Section 1: Public Comment on Transition Plan

Action Item	Description	Proposed Start Date	Proposed End Date
Provider/stakeholder letter of introduction	DPHHS sends informational overview with a cover letter.	09/03/14	10/01/14
Draft transition plan available on website	DPHHS has DRAFT on website.	09/30/14	10/08/14
Schedule a public meeting and webinar for transition plan	DPHHS scheduled public meeting on October 28, 2014, 9:00 a.m. to noon, at the DPHHS Auditorium, 111 N. Sanders Street, Helena. Participation possible in person or by webinar.	9/3/2014	10/28/14
Tribal Consultation letter and Public notice sent to interested parties	DPHHS drafts the tribal consultation letter and the public notice with the information about the website and stakeholder public meeting.	09/03/14	9/29/2014, mail letter by 10/6/14; publish in newspapers by 10/10/14
Put a comment section on the transition plan website for stakeholders to submit comments electronically	DPHHS will place a comment section on the website that can be collected and analyzed. Work on text for the comment section.	08/31/14	10/08/14
Public comment period for 30 days		10/10/14	due 11/10/2014
Review public comments	DPHHS will develop responses to the public comments and post on the website. Updates provided to CMS as needed.	11/11/14	12/03/14
Submit Final Transition Plan to CMS			12/12/14

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To continue to receive federal Medicaid funds for HCBS waiver services, Montana must comply with the “settings” requirements made effective by CMS regulations on 3/17/2014. CMS has granted a five-year period in which to come into compliance with these regulations, which is 3/17/2019. This draft document is Montana’s plan of how it will come into compliance.

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Section 2: Assessment

Action Item	Description	Proposed Start Date	Proposed End Date
Assessment of settings	DPHHS conducts a preliminary assessment of the existing HCB services for compliance with HCBS characteristics, and assessment submitted with Transition Plan.	06/17/14	12/12/14
Draft provider self assessment tool	DPHHS drafts a provider self assessment tool to compile baseline information on individual HCBS settings compliance. Updates provided to CMS as needed.	01/12/15	04/30/15
Draft validation tool for provider assessment	DPHHS drafts a tool to validate the results of the provider assessment, includes on-site assessment and member survey information.	05/01/15	08/03/15
Draft member survey	DPHHS drafts a member experience survey to compile information on their satisfaction with HCBS setting. Updates provided to CMS as needed.	01/12/15	04/30/15
Public comment for 30 days on provider self assessment tools and member survey	DPHHS will provide opportunity for public comment in order to get feedback and refine assessment tool & member survey.	05/01/15	06/01/15
Finalize provider self assessment tools and member survey	DPHHS makes changes as appropriate based on comment and feedback on validation and assessment tools and member survey.	06/01/15	07/01/15
Send letter to providers and members with instructions on self-assessment tool and survey	DPHHS sends letter to providers describing the self assessment tool and member survey with the website to access the tool and survey online.	07/01/15	07/15/15
Implementation of Provider self assessment current and prospective providers	Providers will complete self assessment tool to compile baseline information on individual HCBS settings compliance. Members will complete member survey.	07/15/15	09/15/15
Public comment for 30 days on validation tool	DPHHS will provide opportunity for public comment in order to get feedback and refine validation tool.	08/04/15	09/04/15
Finalize validation tool	DPHHS makes changes as appropriate based on comment and feedback on validation tool.	09/05/15	10/05/15
DPHHS analysis of provider self assessments	DPHHS will use a matrix to conduct an analysis of self assessments to evaluate validity of the provider self assessments and determine onsite reviews.	09/15/15	11/30/15
Conduct on site reviews to validate assessments	DPHHS will schedule on site reviews of providers to validate compliance.	12/01/15	05/30/16
Analysis of onsite reviews	DPHHS will analyze the results of the on-site survey assessment to identify specific issues and challenges that will need to be addressed through the 5 year transition period.	06/01/16	07/31/16
Distribute results on DPHHS's on-site review of validation, provider self-assessments and member surveys	DPHHS develops and distributes an individualized report for the providers to use to become compliant with the federal HCBS setting rule. In addition, DPHHS will complete an aggregate report with statewide information and will post it on the HCBS website. Updates provided to CMS as needed.	08/01/16	08/31/16
DPHHS will monitor & identify member survey to assure consistency in community access.	DPHHS incorporates member survey into existing program reviews on an ongoing basis.	6/15/2015	8/1/2016

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Section 3: Remedial Strategies

Action Item	Description	Proposed Start Date	Proposed End Date
Providers who are not in compliance with the HCBS setting rule and wish to remain enrolled waiver providers will submit a compliance plan	Individual providers develop and submit plan that identifies action steps and dates to come into compliance for all items identified as non compliant on the provider self assessment analysis. Compliance plans cannot extend beyond March 17, 2019.	09/01/16	11/15/16
Evaluation of non-compliant providers	DPHHS will conduct on site reviews to evaluate validity of remediation compliance assessments.	11/16/16	06/30/17
Determine DPHHS response to non-compliant enrolled providers	Develop timeline for 1. provider dis-enrollment; 2. transition plan for members; 3. appeal rights for members and providers.	07/01/17	09/01/17
New Provider enrollment	DPHHS will develop process for new provider enrollment to ensure settings are in compliance.	10/1/15	01/01/16
Public comment for 30 days on provider enrollment	DPHHS will provide opportunity for public comment in order to get feedback and refine the provider enrollment/disenrollment process.	01/01/16	02/01/16
Implementation of new provider enrollment process	Statewide implementation of new provider enrollment process. This includes consideration of provider/stakeholder feedback.	02/01/16	03/31/16
Disenrollment of existing non-compliant providers	Statewide implementation of disenrollment of non-compliant providers who do not wish to or cannot come into compliance with new setting requirements.	10/02/17	03/17/19
Member Transition Plan	DPHHS will develop process to transition members to enrolled providers who meet the setting rule.	07/01/17	09/01/17
Implementation of Provider self assessment current and prospective providers	DPHHS will solicit feedback from members, advocacy groups and providers on member transition plan.	09/02/17	10/01/17
Implementation of member transition plan	DPHHS will work with members, families, case managers and service providers to ensure members are transitioned to providers meeting HCBS setting requirements. Members will be given timely notice and a choice of alternative providers through a person centered process. Transition of members will be comprehensively tracked to successful placement and continuity of service.	10/02/17	03/17/19

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Section 4: Program Administration

Action Item	Description	Proposed Start Date	Proposed End Date
Administrative Rules of Montana	DPHHS will identify and revise rules to reflect final regulations on HCBS setting requirements. Updates to CMS as needed.	01/01/15	07/01/16
Member, Families, Stakeholder and Provider education	Update documents to ensure HCBS info is accurate, etc.	10/01/14	ongoing
Provider Manual revisions	DPHHS will revise manuals to incorporate regulatory requirements for HCB and qualities of an HCB setting. This step is congruent with revising administrative rules. Updates to CMS as needed.	01/01/16	07/01/16
Incorporate education and HCB compliance understanding into Provider Enrollment	When agencies enroll to provide HCBS, they will be provided guidance on HCB setting requirements. Updates provided to CMS as needed.	10/01/14	ongoing

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