

Brain Injury Transition Plan

Action Item	Start Date	Projected End Date	Key Stakeholders	Progress/Status
Program Component: Stakeholder Engagement and Oversight				
Action Item: Convene an interagency group to manage the transition planning process for the BI waiver.	Start Date: 5/21/2014	End Date: 3/15/2019	Key Stakeholders: Colorado Department of Health Care Policy and Financing (The Department), The Lewin Group	Progress/Status: interagency team developed and meeting weekly
Action Item: Develop a communication strategy to manage the public input required by the rule as well as ongoing communication on the implementation of the transition plan. Adapt the strategy to different audiences (e.g. SEPs, CCBs, providers).	Start Date: 7/10/2014	End Date: 7/30/2014	Key Stakeholders: The Department	Progress/Status: submitted proposal to CMS for review on 7/11/2014
Action Item: Reach out to BI providers and provider associations to increase the understanding of the rule and maintain open lines of communication.	Start Date: 6/30/2014	End Date: 3/15/2019	Key Stakeholders: The Department, SEPs, Program Approved Service Agencies, Assisted Living Residences, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Brain Injury Stakeholder Workgroup, Mental Health Centers, BHO, CDPHE, Residential Care Collaborative, Division of Housing, Colorado Cross-Disability Coalition (CCDC), Independent Living Centers, Colorado Legal Services, Leading Age, Alliance, Craig Hospital, Brain Injury Alliance of Colorado, Brain Injury Committee, Hilltop, BrainCare, Wildflower, Aurora Residential, Learning Services, Greeley Center for Independence, Colorado Gerontological Society and other organizations as identified	Progress/Status: self survey out to providers on 6/30/2014.
Action Item: Create a space on an existing state website to post materials related to BI-HCB settings.	Start Date: 7/10/2014	End Date: 3/15/2019	Key Stakeholders: The Department	

Action Item	Start Date	Projected End Date	Key Stakeholders	Progress/Status
Action Item: Develop and issue required public notices. Collect BI comments and summarize for incorporation in the transition plan and within communication tools (e.g. FAQs).	Start Date: 7/30/2014	End Date: 3/15/2019	Key Stakeholders: The Department, SEPs, Program Approved Service Agencies, Assisted Living Residences, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Brain Injury Stakeholder Workgroup, Mental Health Centers, BHO, CDPHE, Residential Care Collaborative, Division of Housing, Colorado Cross-Disability Coalition (CCDC), Independent Living Centers, Colorado Legal Services, Leading Age, Alliance, Craig Hospital, Brain Injury Alliance of Colorado, Brain Injury Committee, Hilltop, BrainCare, Wildflower, Aurora Residential, Learning Services, Greeley Center for Independence, Colorado Gerontological Society and other organizations as identified	
Action Item: Develop and update on a regular basis a BI external stakeholder communication plan.	Start Date: 9/30/2014	End Date: 3/15/2019	Key Stakeholders: The Department, SEPs, Program Approved Service Agencies, Assisted Living Residences, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Brain Injury Stakeholder Workgroup, Mental Health Centers, BHO, CDPHE, Residential Care Collaborative, Division of Housing, Colorado Cross-Disability Coalition (CCDC), Independent Living Centers, Colorado Legal Services, Leading Age, Alliance, Craig Hospital, Brain Injury Alliance of Colorado, Brain Injury Committee, Hilltop, BrainCare, Wildflower, Aurora Residential, Learning Services, Greeley Center for Independence, Colorado Gerontological Society and other organizations as identified	
Action Item: Continued Stakeholder engagement	Start Date: 9/30/2014	End Date: 3/15/2019	Key Stakeholders: The Department, SEPs, Program Approved Service Agencies, Assisted Living Residences, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Brain Injury Stakeholder Workgroup, Mental Health Centers, BHO, CDPHE, Residential Care Collaborative, Division of Housing, Colorado Cross-Disability Coalition (CCDC), Independent Living Centers, Colorado Legal Services, Leading Age, Alliance, Craig Hospital, Brain Injury Alliance of Colorado, Brain Injury Committee, Colorado Gerontological Society and other organizations as identified	
Program Component: Infrastructure				
1. Review of existing HCBS residential and non-residential settings				

Action Item	Start Date	Projected End Date	Key Stakeholders	Progress/Status
Action Item: Conduct a review of Colorado regulations and supporting documents for the HCB-BI waiver program with residential and non-residential settings.	Start Date: 5/21/2014	End Date: 6/30/2014	Key Stakeholders: The Department, The Lewin Group	
Action Item: Prepare a matrix and report outlining recommendations.	Start Date: 6/1/2014	End Date: 6/30/2014	Key Stakeholders: The Department, The Lewin Group	
Action Item: Create a two level provider survey process.	Start Date: 5/21/2014	End Date: 6/30/2014	Key Stakeholders: The Department, The Lewin Group	
Action Item: Level 1 macro review of provider settings (Surveying of existing providers)	Start Date: 6/30/2014	End Date: 7/14/2014	Key Stakeholders: The Department, The Lewin Group	
Action Item: Level 2 micro review of provider settings based on the results of Level 1 (Site visit to verify survey data)	Start Date: 1/1/2015	End Date: 3/15/2015	Key Stakeholders: The Department, The Lewin Group	
Action Item: Prepare a matrix and report outlining recommendations for Adult Day Health, Day Treatment, Transitional Living Program, and Supportive Living Program.	Start Date: 6/1/2014	End Date: 6/30/2014	Key Stakeholders: The Department, The Lewin Group	
Action Item: Develop a survey for individuals and families to provide input on HC-BI settings by type and location.	Start Date: 10/1/2014	End Date: 3/1/2015	Key Stakeholders: The Department, The Lewin Group	
Action Item: Develop BI specific workgroups and committees as needed to better examine and investigate settings for compliance	Start Date: 12/1/2014	End Date: 1/1/2016	Key Stakeholders: The Department, SEPs, Program Approved Service Agencies, Assisted Living Residences, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Brain Injury Stakeholder Workgroup, Mental Health Centers, BHO, CDPHE, Residential Care Collaborative, Division of Housing, Colorado Cross-Disability Coalition (CCDC), Independent Living Centers, Colorado Legal Services, Leading Age, Alliance, Craig Hospital, Brain Injury Alliance of Colorado, Brain Injury Committee, Hilltop, BrainCare, Wildflower, Aurora Residential, Learning Services, Greeley Center for Independence, Colorado Gerontological Society and other organizations as identified	
2. Modifications to Licensure and Certification rules and operations				

Action Item	Start Date	Projected End Date	Key Stakeholders	Progress/Status
Action Item: Incorporate the outcomes of the assessment of HCB-BI settings within existing licensure and certification processes to identify existing settings as well as potential new settings in development that may not meet the requirements of the rule.	Start Date: 4/1/2015	End Date: 3/15/2019	Key Stakeholders: The Department, SEPs, Program Approved Service Agencies, Assisted Living Residences, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Brain Injury Stakeholder Workgroup, Mental Health Centers, BHO, CDPHE, Residential Care Collaborative, Division of Housing, Colorado Cross-Disability Coalition (CCDC), Independent Living Centers, Colorado Legal Services, Leading Age, Alliance, Craig Hospital, Brain Injury Alliance of Colorado, Brain Injury Committee, Hilltop, BrainCare, Wildflower, Aurora Residential, Learning Services, Greeley Center for Independence, Colorado Gerontological Society and other organizations as identified	
Action Item: Work with the Division of Housing to develop a template leases, written agreements or addendums to support providers in documenting protections and appeals comparable to those provided under Colorado landlord tenant law. Ensure that written language describes the required environment to comply such as locked doors and use of common areas.	Start Date: 1/1/2016	End Date: 3/15/2019	Key Stakeholders: The Department, SEPs, Program Approved Service Agencies, Assisted Living Residences, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Brain Injury Stakeholder Workgroup, Mental Health Centers, BHO, CDPHE, Residential Care Collaborative, Division of Housing, Colorado Cross-Disability Coalition (CCDC), Independent Living Centers, Colorado Legal Services, Leading Age, Alliance, Craig Hospital, Brain Injury Alliance of Colorado, Brain Injury Committee, Hilltop, BrainCare, Wildflower, Aurora Residential, Learning Services, Greeley Center for Independence, Colorado Gerontological Society and other organizations as identified	
Action Item: Analyze and include additional requirements to certification standards, processes and frequency of review in order to comply with the new HCBS settings rule.	Start Date: 4/1/2015	End Date: 3/15/2019	Key Stakeholders: The Department, SEPs, Program Approved Service Agencies, Assisted Living Residences, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Brain Injury Stakeholder Workgroup, Mental Health Centers, BHO, CDPHE, Residential Care Collaborative, Division of Housing, Colorado Cross-Disability Coalition (CCDC), Independent Living Centers, Colorado Legal Services, Leading Age, Alliance, Craig Hospital, Brain Injury Alliance of Colorado, Brain Injury Committee, Hilltop, BrainCare, Wildflower, Aurora Residential, Learning Services, Greeley Center for Independence, Colorado Gerontological Society and other organizations as identified	
3.Modifications to enrollment/re-enrollment procedures				

Action Item	Start Date	Projected End Date	Key Stakeholders	Progress/Status
Action Item: Strengthen provider enrollment and re-enrollment procedures to identify settings that may have indicators of non-compliance and require more thorough review.	Start Date: 11/1/2015	End Date: 3/15/2019	Key Stakeholders: The Department, SEPs, Program Approved Service Agencies, Assisted Living Residences, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Brain Injury Stakeholder Workgroup, Mental Health Centers, BHO, CDPHE, Residential Care Collaborative, Division of Housing, Colorado Cross-Disability Coalition (CCDC), Independent Living Centers, Colorado Legal Services, Leading Age, Alliance, Craig Hospital, Brain Injury Alliance of Colorado, Brain Injury Committee, Hilltop, BrainCare, Wildflower, Aurora Residential, Learning Services, Greeley Center for Independence, Colorado Gerontological Society and other organizations as identified	
Action Item: Strengthen language within enrollment and re-enrollment sections of the waivers and regulations to support person centered principles, a review of “informed” choices and decision-making across the settings requirements including the process for mitigating any restrictions in rights.	Start Date: 11/1/2015	End Date: 3/15/2019	Key Stakeholders: The Department, SEPs, Program Approved Service Agencies, Assisted Living Residences, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Brain Injury Stakeholder Workgroup, Mental Health Centers, BHO, CDPHE, Residential Care Collaborative, Division of Housing, Colorado Cross-Disability Coalition (CCDC), Independent Living Centers, Colorado Legal Services, Leading Age, Alliance, Craig Hospital, Brain Injury Alliance of Colorado, Brain Injury Committee, Hilltop, BrainCare, Wildflower, Aurora Residential, Learning Services, Greeley Center for Independence, Colorado Gerontological Society and other organizations as identified	
4. Revisions to HCBS waiver applications and Colorado regulations				
Action Item: Explore the HCBS-BI waiver and potentially add participant rights within regulations consistent across all programs when applicable.	Start Date: 11/1/2015	End Date: 3/15/2019	Key Stakeholders: The Department, SEPs, Program Approved Service Agencies, Assisted Living Residences, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Brain Injury Stakeholder Workgroup, Mental Health Centers, BHO, CDPHE, Residential Care Collaborative, Division of Housing, Colorado Cross-Disability Coalition (CCDC), Independent Living Centers, Colorado Legal Services, Leading Age, Alliance, Craig Hospital, Brain Injury Alliance of Colorado, Brain Injury Committee, Hilltop, BrainCare, Wildflower, Aurora Residential, Learning Services, Greeley Center for Independence, Colorado Gerontological Society and other organizations as identified	

Action Item	Start Date	Projected End Date	Key Stakeholders	Progress/Status
Action Item: Modify Brain Injury Waiver and rules and regulations to ensure participant choice and strengthen participant protections.	Start Date: 11/1/2015	End Date: 3/15/2019	Key Stakeholders: The Department	
Action Item: Provide clarity on the need for all residential settings to maintain a "home-like" quality.	Start Date: 11/1/2015	End Date: 3/15/2019	Key Stakeholders: The Department	
5.Enhancing training and technical assistance	1/1/2015			
Action Item: Provide strategic technical assistance to clients, providers, case managers, and other stakeholders as needed by issuing fact sheets, FAQ's and responding to questions related to the implementation of the BI waiver transition plan (action steps, timelines, and available technical assistance). These clarifications should provide guidance on being compliant with HCB settings and "home-like" criteria.	Start Date: 8/1/2014	End Date: 3/15/2019	Key Stakeholders: The Department	
Action Item: Require staff training on PCP philosophy and practice.	Start Date: 11/1/2015	End Date: 3/15/2019	Key Stakeholders: The Department and SEPs	
Action Item: Provide training to licensure/certification staff on new HCB-BI settings requirements.	Start Date: 1/1/2016	End Date: 3/15/2019	Key Stakeholders: The Department, CDPHE	
Action Item: Provide training to quality improvement system on new HCB-BI settings outcomes measures.	Start Date: 1/1/2017	End Date: 3/15/2019	Key Stakeholders: The Department, CDPHE	
Action Item: Provide training to enrollment staff to heighten scrutiny of new HCB-BI providers/facilities.	Start Date: 1/1/2017	End Date: 3/15/2019	Key Stakeholders: The Department, CDPHE	
Action Item: Develop and include ongoing BI provider training on rights, protections, person-centered thinking, and community inclusion.	Start Date: 1/1/2017	End Date: 3/15/2019	Key Stakeholders: The Department, CDPHE	
Program Component: Inclusion of Requirements within the HCBS Quality Framework				
Action Item: Include outcomes measures on settings within the current 1915c waiver quality improvement system.	Start Date: 6/1/2017	End Date: 3/15/2019	Key Stakeholders: The Department, CDPHE	
Action Item: Develop a HCB-BI provider scorecard.	Start Date: 10/1/2014	End Date: 3/15/2019	Key Stakeholders: The Department, HCBS Providers, CDPHE, Communication Department	

Action Item	Start Date	Projected End Date	Key Stakeholders	Progress/Status
Action Item: Monitor data from Quality of Life and NCI related to outcomes (e.g. opportunities for “informed” choice, choice of roommate and setting, freedom from coercion).	Start Date: 1/1/2016	End Date: 3/15/2019	Key Stakeholders: The Department	
Action Item: Monitor person-centered planning and integrated employment requirements through a routine review of data to measure effectiveness of supports.	Start Date: 6/1/2017	End Date: 3/15/2019	Key Stakeholders: The Department, CDPHE	
Action Item: Formal annual progress review and update of HCBS-BI transition plan	Start Date: 8/1/2015	End Date: 3/15/2019	Key Stakeholders: The Department, The Lewin Group	
Action Item: Review survey cycles for HCBS-BI providers.	Start Date: 6/1/2017	End Date: 3/15/2019	Key Stakeholders: The Department, CDPHE	
Program Component: Managing Provider Transition Plans				
Action Item: Develop a transition plan approval process which requires the provider to submit progress reports on the implementation of requirement for HCBS settings.	Start Date: 11/1/2016	End Date: 3/15/2019	Key Stakeholders: The Department, SEPs, CDPHE	
Action Item: Include ongoing updates within the BI provider scorecard.	Start Date: 11/1/2016	End Date: 3/15/2019	Key Stakeholders: The Department, SEPs, CDPHE	
Action Item: Develop a process for helping individuals to transition to new HCB-BI settings as appropriate.	Start Date: 1/1/2016	End Date: 3/15/2019	Key Stakeholders: The Department, SEPs, Program Approved Service Agencies, Assisted Living Residences, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Brain Injury Stakeholder Workgroup, Mental Health Centers, BHO, CDPHE, Residential Care Collaborative, Division of Housing, Colorado Cross-Disability Coalition (CCDC), Independent Living Centers, Colorado Legal Services, Leading Age, Alliance, Craig Hospital, Brain Injury Alliance of Colorado, Brain Injury Committee, Hilltop, BrainCare, Wildflower, Aurora Residential, Learning Services, Greeley Center for Independence, Colorado Gerontological Society and other organizations as identified	