

# Colorado Home and Community Based Services Transition Plan

Action Item	Start Date	Projected End Date	Key Stakeholders	Progress/Status
<b>Program Component: Stakeholder Engagement and Oversight</b>				
Convene an interagency group to manage the transition planning process.	5/21/2014	work with groups to determine timeline	Colorado Department of Health Care Policy and Financing (The Department), The Lewin Group	interagency team developed and meeting weekly
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).	7/10/2014	7/30/2014	The Department	submitted proposal to CMS for review on 7/11/2014
Reach out to providers and provider associations to increase the understanding of the rule and maintain open lines of communication.	6/30/2014	ongoing	The Department, Single-Entry Point Agencies (SEPs), disability specific organizations, private case management agencies, Alliance, Assisted Living Residences, Parents of Adults with Disabilities Colorado (PADCO), Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Brain Injury Stakeholder Workgroup, Mental Health Centers, Behavioral Health Organizations (BHOs), Colorado Department of Public Health and Environment (CDPHE), County Directors/CHRP Liaison, Guardian at Litem (GAL), Residential Care Collaborative, Arc's, 24 hour Monitoring Unit, Residential Child Care Facility, Permanency Round Table, Foster Home Placements, Policy Advisory Committee (PAC), Sub PAC Family Voices, Parent to Parent, Colorado Cross-Disability Coalition (CCDC), Independent Living Centers, Rooster Ranch, Tall Tales Ranch, Colorado Legal Services, Leading Age, Alliance, Division for Regional Center Operations, Ombudsman, Colorado Gerontological Society and other organizations as identified	self survey out to providers on 6/30/2014.
Create a space on an existing state website to post materials related to settings and person-centered planning.	7/10/2014	work with groups to determine timeline	The Department	

Action Item	Start Date	Projected End Date	Key Stakeholders	Progress/Status
Develop and issue required public notices. Collect comments and summarize for incorporation in the transition plan and within communication tools (e.g. FAQs).	7/30/2014	ongoing	The Department, CCBs, SEPs, disability specific organizations, private case management agencies, Program Approved Service Agencies, Alliance, Assisted Living Residences, PADCO, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Brain Injury Stakeholder Workgroup, Mental Health Centers, BHO, CDPHE, County Directors/CHRP Liaison, GAL, Residential Care Collaborative, Arc's, 24 hour Monitoring Unit, Residential Child Care Facility, Permanency Round Table, Foster Home Placements, PAC, Sub PAC, Family Voices, Parent to Parent, CCDC, Independent Living Centers, Rooster Ranch, Tall Tales Ranch, Colorado Legal Services, Leading Age, Alliance, Division for Regional Center Operations, Ombudsman, Colorado Gerontological Society and other organizations as identified	
Continue ongoing stakeholder engagement surrounding Supported Employment Services and similar programs for non-DIDD waivers.	5/22/2014	ongoing	The Department, CCBs, SEPs, disability specific organizations, private case management agencies, Program Approved Service Agencies, Alliance, Assisted Living Residences, PADCO, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Brain Injury Stakeholder Workgroup, Mental Health Centers, BHO, CDPHE, County Directors/CHRP Liaison, GAL, Residential Care Collaborative, Arc's, 24 hour Monitoring Unit, Residential Child Care Facility, Permanency Round Table, Foster Home Placements, PAC, Sub PAC, Family Voices, Parent to Parent, CCDC, Independent Living Centers, Rooster Ranch, Tall Tales Ranch, Colorado Legal Services, Leading Age, Alliance, Division for Regional Center Operations, Ombudsman, Colorado Gerontological Society and other organizations as identified	
Develop and update on a regular basis an external stakeholder communication plan.	9/30/2014	ongoing	The Department, CCBs, SEPs, disability specific organizations, private case management agencies, Program Approved Service Agencies, Alliance, Assisted Living Residences, PADCO, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Brain Injury Stakeholder Workgroup, Mental Health Centers, BHO, CDPHE, County Directors/CHRP Liaison, GAL, Residential Care Collaborative, Arc's, 24 hour Monitoring Unit, Residential Child Care Facility, Permanency Round Table, Foster Home Placements, PAC, Sub PAC, Family Voices, Parent to Parent, CCDC, Independent Living Centers, Rooster Ranch, Tall Tales Ranch, Colorado Legal Services, Leading Age, Alliance, Division for Regional Center Operations, Ombudsman, Colorado Gerontological Society and other organizations as identified	

Action Item	Start Date	Projected End Date	Key Stakeholders	Progress/Status
<b>Program Component: Infrastructure</b>				
<b>1. Review of existing HCBS residential and non-residential settings</b>				
Conduct a review of Colorado regulations and supporting documents across the 7 waiver programs with residential and non-residential settings.	5/21/2014	6/30/2014	The Department, The Lewin Group	
Prepare a matrix and report outlining recommendations.	6/1/2014	6/30/2014	The Department, The Lewin Group	
Create a two level provider survey process.	5/21/2014		The Department, The Lewin Group	Created macro review, gathering data
1. Level 1 macro review of provider settings (Surveying of existing providers)	6/30/2014	7/14/2014	The Department, The Lewin Group	Department currently reviewing data
2. Level 2 micro review of provider settings based on the results of Level 1(Site visit to verify survey data)	9/1/2014	work with groups to determine timeline	The Department, The Lewin Group	
Develop a survey for individuals and families to provide input on settings by type and location.	10/1/2014	1/1/2015	The Department, The Lewin Group	
Prepare a list of settings that do not meet the residential and non-residential requirements, may meet the requirements with changes, and settings Colorado chooses to submit under CMS heightened scrutiny.	1/1/2015	work with groups to determine timeline	The Department, CCBs, SEPs, disability specific organizations, private case management agencies, Program Approved Service Agencies, Alliance, Assisted Living Residences, PADCO, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Brain Injury Stakeholder Workgroup, Mental Health Centers, BHO, CDPHE, County Directors/CHRP Liaison, GAL, Residential Care Collaborative, Arc's, 24 hour Monitoring Unit, Residential Child Care Facility, Permanency Round Table, Foster Home Placements, PAC, Sub PAC, Family Voices, Parent to Parent, CCDC, Independent Living Centers, Rooster Ranch, Tall Tales Ranch, Colorado Legal Services, Leading Age, Alliance, Division for Regional Center Operations, Ombudsman, Colorado Gerontological Society and other organizations as identified	
<b>2. Modifications to Licensure and Certification rules and operations</b>				

Action Item	Start Date	Projected End Date	Key Stakeholders	Progress/Status
<p>Incorporate the outcomes of the assessment of 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.</p>	<p>4/1/2015</p>	<p>work with groups to determine timeline</p>	<p>The Department, CCBs, SEPs, disability specific organizations, private case management agencies, Program Approved Service Agencies, Alliance, Assisted Living Residences, PADCO, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Brain Injury Stakeholder Workgroup, Mental Health Centers, BHO, CDPHE, County Directors/CHRP Liaison, GAL, Residential Care Collaborative, Arc's, 24 hour Monitoring Unit, Residential Child Care Facility, Permanency Round Table, Foster Home Placements, PAC, Sub PAC, Family Voices, Parent to Parent, CCDC, Independent Living Centers, Rooster Ranch, Tall Tales Ranch, Colorado Legal Services, Leading Age, Alliance, Division for Regional Center Operations, Ombudsman, Colorado Gerontological Society and other organizations as identified</p>	
<p>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.</p>	<p>1/1/2016</p>	<p>work with groups to determine timeline</p>	<p>The Department, CCBs, SEPs, disability specific organizations, private case management agencies, Program Approved Service Agencies, Alliance, Assisted Living Residences, PADCO, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Brain Injury Stakeholder Workgroup, Mental Health Centers, BHO, CDPHE, County Directors/CHRP Liaison, GAL, Residential Care Collaborative, Arc's, 24 hour Monitoring Unit, Residential Child Care Facility, Permanency Round Table, Foster Home Placements, PAC, Sub PAC, Family Voices, Parent to Parent, CCDC, Independent Living Centers, Rooster Ranch, Tall Tales Ranch, Colorado Legal Services, Leading Age, Alliance, Division for Regional Center Operations, Ombudsman, Colorado Gerontological Society and other organizations as identified</p>	

Action Item	Start Date	Projected End Date	Key Stakeholders	Progress/Status
Analyze and include additional requirements to certification standards, processes and frequency of review in order to comply with the new HCBS settings rule.	4/1/2015	work with groups to determine timeline	The Department, CCBs, SEPs, disability specific organizations, private case management agencies, Program Approved Service Agencies, Alliance, Assisted Living Residences, PADCO, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Brain Injury Stakeholder Workgroup, Mental Health Centers, BHO, CDPHE, County Directors/CHRP Liaison, GAL, Residential Care Collaborative, Arc's, 24 hour Monitoring Unit, Residential Child Care Facility, Permanency Round Table, Foster Home Placements, PAC, Sub PAC, Family Voices, Parent to Parent, CCDC, Independent Living Centers, Rooster Ranch, Tall Tales Ranch, Colorado Legal Services, Leading Age, Alliance, Division for Regional Center Operations, Ombudsman, Colorado Gerontological Society and other organizations as identified	
<b>3.Modifications to enrollment/re-enrollment procedures</b>				
Strengthen enrollment and re-enrollment procedures to identify settings that may have indicators of non-compliance and require more thorough review.	work with groups to determine timeline	work with groups to determine timeline	The Department, CCBs, SEPs, disability specific organizations, private case management agencies, Program Approved Service Agencies, Alliance, Assisted Living Residences, PADCO, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Brain Injury Stakeholder Workgroup, Mental Health Centers, BHO, CDPHE, County Directors/CHRP Liaison, GAL, Residential Care Collaborative, Arc's, 24 hour Monitoring Unit, Residential Child Care Facility, Permanency Round Table, Foster Home Placements, PAC, Sub PAC, Family Voices, Parent to Parent, CCDC, Independent Living Centers, Rooster Ranch, Tall Tales Ranch, Colorado Legal Services, Leading Age, Alliance, Division for Regional Center Operations, Ombudsman, Colorado Gerontological Society and other organizations as identified	

Action Item	Start Date	Projected End Date	Key Stakeholders	Progress/Status
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.	work with groups to determine timeline	work with groups to determine timeline	The Department, CCBs, SEPs, disability specific organizations, private case management agencies, Program Approved Service Agencies, Alliance, Assisted Living Residences, PADCO, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Brain Injury Stakeholder Workgroup, Mental Health Centers, BHO, CDPHE, County Directors/CHRP Liaison, GAL, Residential Care Collaborative, Arc's, 24 hour Monitoring Unit, Residential Child Care Facility, Permanency Round Table, Foster Home Placements, PAC, Sub PAC, Family Voices, Parent to Parent, CCDC, Independent Living Centers, Rooster Ranch, Tall Tales Ranch, Colorado Legal Services, Leading Age, Alliance, Division for Regional Center Operations, Ombudsman, Colorado Gerontological Society and other organizations as identified	
<b>4. Revisions to HCBS waiver applications and Colorado regulations</b>				
Explore all waivers and potentially add participant rights within regulations consistent across all programs when applicable.	11/1/2015	work with groups to determine timeline	The Department, CCBs, SEPs, disability specific organizations, private case management agencies, Program Approved Service Agencies, Alliance, Assisted Living Residences, PADCO, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Brain Injury Stakeholder Workgroup, Mental Health Centers, BHO, CDPHE, County Directors/CHRP Liaison, GAL, Residential Care Collaborative, Arc's, 24 hour Monitoring Unit, Residential Child Care Facility, Permanency Round Table, Foster Home Placements, PAC, Sub PAC, Family Voices, Parent to Parent, CCDC, Independent Living Centers, Rooster Ranch, Tall Tales Ranch, Colorado Legal Services, Leading Age, Alliance, Division for Regional Center Operations, Ombudsman, Colorado Gerontological Society and other organizations as identified	
Modify waivers and regulations to ensure participant choice and strengthen participant protections.	11/1/2015	work with groups to determine timeline	The Department	
Require staff training on PCP philosophy and practice.	11/1/2015	work with groups to determine timeline	The Department, SEPs and CCBs	
Provide clarity on the need for all residential settings to maintain a “home-like” quality.	11/1/2015	work with groups to determine timeline	The Department	

Action Item	Start Date	Projected End Date	Key Stakeholders	Progress/Status
Expand community integration opportunities for participants using adult day health and include desired outcomes and required provisions within regulations.	11/1/2015	work with groups to determine timeline	The Department, CCBs, SEPs, Program Approved Service Agencies, Directors meeting, Alliance, Assisted Living Residences, Arc of Colorado, PADCO, Self-Advocacy Network, Advocacy Communication Group, Participant Directed, Waiver Simplification, Brian Injury Stakeholder Workgroup, Mental Health Centers, BHO, The Lewin Group, CDPHE	
Modify quality assurance documents to meet HCBS rule requirements and delete references to “non-integrated work services programs provide paid work in sheltered/segregated settings“.	11/1/2015	work with groups to determine timeline	The Department, SEPs, CCBs	
Group Residential Services and Supports (GRSS) encompass group living environments of four (4) to eight (8) participants. Although residential habilitation is described as “home-like”, large settings have the effect of “isolating”. Modify policy related to larger facilities to be more like IRSS.	11/1/2015	work with groups to determine timeline	The Department, CCBs, SEPs, disability specific organizations, private case management agencies, Program Approved Service Agencies, Alliance, Assisted Living Residences, PADCO, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Brain Injury Stakeholder Workgroup, Mental Health Centers, BHO, CDPHE, County Directors/CHRP Liaison, GAL, Residential Care Collaborative, Arc's, 24 hour Monitoring Unit, Residential Child Care Facility, Permanency Round Table, Foster Home Placements, PAC, Sub PAC, Family Voices, Parent to Parent, CCDC, Independent Living Centers, Rooster Ranch, Tall Tales Ranch, Colorado Legal Services, Leading Age, Alliance, Division for Regional Center Operations, Ombudsman, Colorado Gerontological Society and other organizations as identified	
For CHRP, although the regulations speak to a “home-like” environment, large settings do have the effect of “isolating”. Reduce the size of RCCF and some group homes and center settings and strengthen person-centered planning processes to mitigate any limitations. Additionally, align financial and dietary rights with the DD waiver when appropriate by age or court order.	1/1/2015	work with groups to determine timeline	The Department, Department of Social Services (DSS), County Directors/CHRP Liaison, Educational settings, GAL, Residential Care Collaborative, Arc of Colorado, 24 hour Monitoring Unit, Residential Child Care Facility, Permanency Round Table, Foster Home Placements, PAC, Sub PAC	
For CHRP, the waiver provides guidance on an individual's choice between institutional care and HCBS, but is silent about “informed” choices of settings (i.e. type, roommates). Greater clarity on a broad range of choices (i.e. roommates, options in settings and living arrangements), when consistent with Court orders, will be added to the person-centered planning process.	1/1/2015	work with groups to determine timeline	The Department, DSS, County Directors/CHRP Liaison, GAL, Residential Care Collaborative, Arc of Colorado, 24 hour Monitoring Unit, Residential Child Care Facility, Permanency Round Table, Foster Home Placements, PAC, Sub PAC	
For CHRP, expand Individual Choice Statement to include additional flexibility in choosing persons who attend team meetings, roommates when applicable, and setting type when such an option is available through a court order.	1/1/2015	work with groups to determine timeline	The Department, DSS, County Directors/CHRP Liaison, GAL, Residential Care Collaborative, Arc of Colorado, 24 hour Monitoring Unit, Residential Child Care Facility, Permanency Round Table, Foster Home Placements, PAC, Sub PAC	

Action Item	Start Date	Projected End Date	Key Stakeholders	Progress/Status
For CHRP, identify those settings that provide educational supports within the residential setting and move toward integration within the public school system.	1/1/2015	work with groups to determine timeline	The Department, DSS, County Directors/CHRP Liaison, GALs, Residential Care Collaborative, Arc of Colorado, 24 hour Monitoring Unit, Residential Child Care Facility, Permanency Round Table, Foster Home Placements, PAC, Sub PAC	
<b>5.Enhancing training and technical assistance</b>	<b>1/1/2015</b>			
Conduct a webinar series to highlight the settings requirements (residential, non-residential, adults, children) and principles of person-centered planning.	1/1/2015	ongoing	The Department, CCBs, SEPs, disability specific organizations, private case management agencies, Program Approved Service Agencies, Alliance, Assisted Living Residences, PADCO, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Brain Injury Stakeholder Workgroup, Mental Health Centers, BHO, CDPHE, County Directors/CHRP Liaison, GAL, Residential Care Collaborative, Arc's, 24 hour Monitoring Unit, Residential Child Care Facility, Permanency Round Table, Foster Home Placements, PAC, Sub PAC, Family Voices, Parent to Parent, CCDC, Independent Living Centers, Rooster Ranch, Tall Tales Ranch, Colorado Legal Services, Leading Age, Alliance, Division for Regional Center Operations, Ombudsman, Colorado Gerontological Society and other organizations as identified	
Provide strategic technical assistance by issuing fact sheets, FAQ's and responding to questions related to the implementation of the transition plan (action steps, timelines, and available technical assistance).	8/1/2014	ongoing	The Department	
Provide training to licensure/certification staff on new settings requirements.	1/1/2016	ongoing	The Department, CDPHE	
Provide training to quality improvement system on new settings outcomes measures.	1/1/2017	ongoing	The Department, CDPHE	
Provide training to enrollment staff to heighten scrutiny of new providers/facilities.	1/1/2017	ongoing	The Department, CDPHE	
Develop and include ongoing provider training on rights, protections, person-centered thinking, and community inclusion.	1/1/2017	ongoing	The Department, CDPHE	
Provide training to case managers through SEPs, CCBs, and County Department of Social Services to support an "informed" choice of setting, identify areas of non-compliance and support implementation of the transition plan.	1/1/2017	ongoing	The Department, SEPs, DSS and CCBs	
<b>Program Component: Inclusion of Requirements within the HCBS Quality Framework</b>				
Include outcomes measures on settings within the current 1915c waiver quality improvement system.	6/1/2017	ongoing	The Department, CDPHE	
Develop a provider scorecard.	10/1/2014	ongoing	The Department, HCBS Providers, CDPHE, Communication Department	
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).	1/1/2016	ongoing	The Department	

Action Item	Start Date	Projected End Date	Key Stakeholders	Progress/Status
Monitor person-centered planning and integrated employment requirements through a routine review of data to measure effectiveness of supports.	6/1/2017	ongoing	The Department, CDPHE	
Formal annual progress review and update of transition plan	8/1/2015	ongoing	The Department, The Lewin Group	
Review survey cycles for HCBS providers.	6/1/2017	ongoing	The Department, CDPHE	
<b>Program Component: Managing Provider Transition Plans</b>				
Develop a transition plan approval process which requires the provider to submit progress reports on the implementation of requirement for HCBS settings.	11/1/2016	ongoing	The Department, SEPs, CCBs, CDPHE	
Include ongoing updates within the provider scorecard.	11/1/2016	ongoing	The Department, SEPs, CCBs, CDPHE	
Develop a process for helping individuals to transition to new settings as appropriate.	1/1/2016	ongoing	The Department, CCBs, SEPs, disability specific organizations, private case management agencies, Program Approved Service Agencies, Alliance, Assisted Living Residences, PADCO, Self-Advocacy Network, Advocacy Communication Group, Participant Directed Programs Policy Collaborative, Waiver Simplification Workgroup, Brain Injury Stakeholder Workgroup, Mental Health Centers, BHO, CDPHE, County Directors/CHRP Liaison, GAL, Residential Care Collaborative, Arc's, 24 hour Monitoring Unit, Residential Child Care Facility, Permanency Round Table, Foster Home Placements, PAC, Sub PAC, Family Voices, Parent to Parent, CCDC, Independent Living Centers, Rooster Ranch, Tall Tales Ranch, Colorado Legal Services, Leading Age, Alliance, Division for Regional Center Operations, Ombudsman, Colorado Gerontological Society and other organizations as identified	