

Colorado Home and Community Based Services Statewide Transition Plan (STP) - November 16, 2015

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Action Item	Start Date	Projected End Date	Key Stakeholders	Progress/Status	Findings/Results/Outcomes
Program Component: Stakeholder Engagement and Oversight					
1 Convene an interagency group to manage the transition planning process.	5/21/2014	Completed 6/1/2014	Colorado Department of Health Care Policy and Financing (The Department), The Lewin Group, CDPHE	An Interagency team has been convened and meets weekly. The team will continue to meet to monitor and problem-solve issues that may arise throughout the planning process.	A timeline of prioritized tasks for the Department and key stakeholders was developed as a result of an in-person meeting where the interagency group discussed managing the transition process. This timeline will be included on weekly meeting agendas and leveraged as a guide in our immediate next steps. Weekly meetings provide a forum for Department staff, leaders and other key stakeholders to discuss and work on mapping out processes and how to best support the state's providers and waiver beneficiaries.
2 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., case management agencies (CMAs), including Single Entry Point (SEPs) and Community Center Boards (CCBs); providers).	7/10/2014	Completed 7/30/2014	The Department	Ongoing communication occurs with stakeholders, state agencies and other community partners	
3 Reach out to providers and provider associations to increase the understanding of the rule and maintain open lines of communication.	6/30/2014	3/15/2019	The Department, CMAs, including SEPs and CCBs, 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	A provider self survey was disseminated to Colorado's HCBS providers and returned on 6/30/2014. The Department is in process of analyzing data. The assessment survey was fielded across providers and a scorecard of results developed. Additional assessment is still expected as Colorado seeks a 100% response rate across relevant provider types. During provider meetings, advisory committees, stakeholder meetings, etc., department staff have been discussing the rule and how the state is working to support all providers to become compliant. Communications coming from the Department (will) include information, sometimes directly other times indirectly, about the requirements with additional information on how to take small steps towards compliance. These communications will become more robust as the Department learns more about provider status, needs, and progress in the implementation of the Statewide Transition Plan.	The Department has actively reached out to 580 providers, and the following provider associations - CMAs, including SEPs and CCBs, 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.
4 Create a space on an existing state website to post materials related to settings and person-centered planning.	7/10/2014	Completed 7/10/2014	The Department	Completed - The website is located at www.colorado.gov/hcpf/hcbs-waiver-transition . Currently, the HCBS Waiver-Specific Draft Transition Plans and Amendments are posted. The Department has posted training webinars and other education and outreach materials here: www.colorado.gov/hcpf/home-and-community-based-services-settings-final-rule .	www.colorado.gov/hcpf/home-and-community-based-services-settings-final-rule - In August 2015: 106/Sept2015: 22 ("hits")
5 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	9/30/2015	The Department, CMAs, including SEPs and CCBs, 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	When the revised STP was released for public comment in October 2015, this cell stated: "Initial public comment completed-30 day noticing 9/10/2014" - The STP has been updated to reflect additional information gathered, and the Department is now posting the public notice again for the updated STP. This public notice document will be posted on October 6, 2015 in the state's register, which is online at www.sos.state.co.us/CCR/RegisterHome.do , e-mailed to all stakeholders, and will also be available electronically on the Department's website (www.colorado.gov/hcpf/hcbs-waiver-transition) and non-electronically; specifically, the Department will public notice in 9 newspapers whose cities have 50,000 or more residents and whose circulation that reach the surrounding rural areas. If you need a paper copy please contact Adam Tucker at 303-866-5472, or you may send a request with your name and address to Colorado Department of Health Care Policy and Financing, Attention: Adam Tucker, 1570 Grant St., Denver, CO 80203-1818 The comment period on this revised STP is 30 days from the date of the Public Notice. Please submit comment to: HCBSRulesSubmission@state.co.us , or by mail to: Attention: HCBS Setting Final Rule, 1570 Grant Street, Denver, CO 80203-1818 Colorado will also make available the document including all changes made as a result of public and CMS comments."	During the initial public comment period, the Department received 106 questions from eleven different community stakeholders. All questions were clarifying questions that did not require the Department to change the STP. The only changes the Department made were to ensure that all of the community stakeholder groups were listed in the STP. Since the initial public notice period, the Department has implemented a more thorough public notice procedure. HCPF has prepared a separate summary, dated November 16, 2015, of the public notice process employed with the revised STP, as well as a summary of the comment(s) received and HCPF's responses to such comment(s).
6 Continue ongoing stakeholder engagement surrounding Supported Employment Services and similar programs for non-DIDD waivers.	5/22/2014	3/15/2019	The Department, CMAs, including SEPs and CCBs, 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	Ongoing discussions regarding Supportive Employment occur with the Department and Stakeholders. Currently identifying possibilities and areas of concern.	The state has met with many residential and non-residential providers and expressed the importance of community integration and meaningful community roles for individuals. This has included individuals seeking competitive employment as well as looking outside of competitive employment into volunteer opportunities, and other various activities of their choosing. The state is currently reviewing its rules and regulations to try to eliminate barriers to meaningful community integration, an example of this is, a disincentive to work when in an Alternative Care Facility, due to payments to the facility increasing as income increases.
7 Develop and update on a regular basis an external stakeholder communication plan.	9/30/2014	3/15/2019	The Department, CMAs, including SEPs and CCBs, 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	The Department is talking to lead staff about adding a standing agenda item to standing Stakeholder meeting and has started to give updates at the Monthly Advocate Communication meeting and the Adult Care Facility provider meeting. The Department will begin to provide quarterly e-mail blast to Stakeholders. The Department will include all updates on the website (https://www.colorado.gov/hcpf/home-and-community-based-services-settings-final-rule)	On November 9, 2015, HCPF and Lewin hosted two in-person stakeholder workgroups, one relating to residential services and the other relating to non-residential services, to discuss best practices and other issues for implementing the HCBS rule. The workgroups were tasked with reviewing the corresponding residential and non-residential CMs exploratory questions and give examples of "best practices" they had observed or heard of under the areas of Community Integration, Informed Choice, and Participant Rights. The workgroups will continue to meet virtually (by phone) every month through March 2016.
Program Component: Infrastructure					
1. Review of existing HCBS residential and non-residential settings					
8 Assessment for settings for where participants receive services and where they live	5/21/2014	Completed 6/30/2014	The Department, The Lewin Group	Completed-Settings were assessed regarding where participants live and receive services. The survey closed on March 27, 2015 with 420 responses between the 2014 and 2015 collection periods representing 356 providers, some of whom responded separately for different service settings. Of the 420 responses, most provide services in residential settings with 75.7% of providers offering such services either exclusively or in combination with non-residential settings. Additionally, 37.9% of responses offer non-residential services by themselves or with residential services. A small portion of survey responses (7.6%) did not identify whether they provided residential or non-residential services.	For Child Residential Settings, ten complete responses were received. This provider group seems largely in compliance with the HCBS Final Rule. Just two providers indicated potential non-compliance with one area mentioned in the survey. One provider said the setting serves a Medicaid-only population, while another said that residents of the setting do not have full access to the setting and it is not specified in a person-centered plan. For Adult Residential Settings, interactions with people without disabilities that are not paid staff and residential populations consisting of only people on Medicaid are two most common areas of potential noncompliance. Choice over leaving a setting at an individual's choosing is another key issue providers may face. Twenty-three percent of respondents indicated individuals do not have this choice for more than four hours daily on weekends and/or weekdays. Of 270 responding Adult Residential Providers, 73 reported no indicators of noncompliance. 197 reported having at least one indicator, with a range from 35 to 58 providers having three indicators of non-compliance or less. For Adult Non-Residential Settings, the actual setting of the service is the most common area of noncompliance. Respondents noted that their setting is segregated and may limit individual's interactions with the greater community. Fifteen percent of respondents noted their setting did not offer much in terms of interaction between individuals receiving services and non-disabled community members, other than paid staff. Another common factor for these settings included providers not paying individuals at least minimum wage for their work (18.5% of respondents). Of 133 responding Adult Non-Residential Settings, 73 reported no indicators of noncompliance. 60 reported having at least one indicator with a range from 9 to 29 providers having three indicators or less.

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Conduct a review of Colorado regulations and supporting documents across the 7 waiver programs with residential and non-residential settings. Prepare a matrix and report outlining recommendations.	5/21/2014	1/1/2016	The Department, The Lewin Group	In progress and on track	Recommendations across all waivers and related regulations were completed. These recommendations will be integrated into both internal and external meetings to further understand potential changes. Generally, for all waivers, recommendations included exploration and possible modification of waivers and rules to better include/define participant rights, informed choice and person-centered practices. The Department is currently reviewing <i>suggested</i> changes. The Department is preparing a matrix that will outline the recommendation and inform the Department on implementation of the waiver and rule changes needed along with a timeline for completion.																																													
10 Create a two level provider survey process.	5/21/2014	Completed 5/1/2015	The Department, The Lewin Group	Completed																																														
11 1. Level 1 macro review of provider settings (Surveying of existing providers)	6/30/2014	Adult setting survey completed 07/14/15. CHRP will be completed by 01/15/2016	The Department, The Lewin Group	Completed.	Children's Residential Providers: Were not included at this time. The State is working to increase response rate and verify responses from providers at this time. Adult Residential Providers: 197 out of 270 responded with indicators of noncompliance - 73.7% of EBD providers are potentially noncompliant (n=152) - 77.5% of DD providers are potentially noncompliant (n=102) - 77.2% of SLS providers are potentially noncompliant (n=79) - 77.1% of Comm Mental Health providers are potentially noncompliant (n=35) - 66.7% of Brain Injury providers are potentially noncompliant (n=18) - 100% of CHRP providers are potentially noncompliant (n=6) - 75% of Spinal Cord providers are potentially noncompliant (n=4) Adult Non-Residential Providers: 60 out of 133 responded with indicators of noncompliance - 53.5% of EBD providers are potentially noncompliant (n=45) - 47.4% of DD providers are potentially noncompliant (n=95) - 50% of Comm Mental Health providers are potentially noncompliant (n=6) - 66.7% of Brain Injury providers are potentially noncompliant (n=18) - 80% of CHRP providers are potentially noncompliant (n=5) - 75% of Spinal Cord providers are potentially noncompliant (n=4)																																													
12 2. Level 2 micro review of provider settings based on the results of Level 1 (Secondary surveying followed by site visit to verify survey data)	7/20/2014	Survey completed 08/20/2015 Site visits to be completed by 01/01/17	The Department, The Lewin Group	Secondary surveying completed. Site visits to validate responses and further assess particular settings are expected to begin by the end of the year.	As of September 2015 the state received 529 responses to the secondary provider survey, representing 204 unique email addresses. As would be expected, most respondents to the Second Provider Survey do delve into potential noncompliance indicating at least one area of potential noncompliance (479). These providers are mostly those who indicated at least one area of potential noncompliance in the Initial Provider Survey. 63.3% of respondents (311) indicated between one and five areas of potential noncompliance. 27.9% of this same group (137) reported between six and 10 of the same and 33 providers reported 11 or more areas of potential noncompliance. Most of the indicators fall under at least one of three major categories of noncompliance including: a. Being adjacent to or on the grounds of an institution b. Having indicators of isolation c. Having indicators of rights issues																																													
13 Develop and conduct survey for individuals and families to provide input on settings by type and location.	10/1/2014	Development completed 6/30/2014. Ongoing: quarterly data collection	The Department, The Lewin Group	Completed the development of the survey. Currently collecting data at https://www.research.net/s/ColoradoHCBS . Data will be analyzed quarterly, beginning in December, 2015.	In Progress. The survey will be ongoing for all individuals and families to take as often as needed as it pertains to their individual needs/person centered care. The Department will push out the survey on quarterly basis to remind individuals and families. The Department and the Lewin group will gather data quarterly and provide a summary reports, updated quarterly. Results will inform processes and providers and/or locations that need additional support or attention. Results will also inform stakeholder engagement agenda items, as well as training topics.																																													
14 On-Site Surveys	6/1/2015	1/1/2017	The Department, The Lewin Group, CDPHE	The Department plans to conduct site visits to verify survey responses and to further assess particular settings. A statistically significant number of site visits will be completed within each provider type to yield a 95% confidence level, as follows: <table border="1"> <thead> <tr> <th>Provider Type</th> <th>Population</th> <th>Sample Size for Site Visits</th> </tr> </thead> <tbody> <tr><td>Adult Day Treatment</td><td>6</td><td>6</td></tr> <tr><td>Adult Day Treatment - Basic</td><td>45</td><td>40</td></tr> <tr><td>Adult Day Treatment - Specialized</td><td>59</td><td>51</td></tr> <tr><td>Alternative Care Facility</td><td>313</td><td>173</td></tr> <tr><td>Day Habilitation - Specialized Habilitation</td><td>126</td><td>95</td></tr> <tr><td>Day Habilitation - Supported Community Connections</td><td>170</td><td>118</td></tr> <tr><td>Residential Habilitation - Group</td><td>55</td><td>48</td></tr> <tr><td>Residential Habilitation - Individual</td><td>104</td><td>82</td></tr> <tr><td>Residential Habilitation - Host Home</td><td>101</td><td>80</td></tr> <tr><td>Supported Living Program</td><td>6</td><td>6</td></tr> <tr><td>Prevocational Services</td><td>32</td><td>30</td></tr> <tr><td>Supported Employment - Group</td><td>66</td><td>56</td></tr> <tr><td>Supported Employment - Individual</td><td>84</td><td>69</td></tr> <tr><td>Total Providers</td><td>1,167</td><td>854</td></tr> </tbody> </table>	Provider Type	Population	Sample Size for Site Visits	Adult Day Treatment	6	6	Adult Day Treatment - Basic	45	40	Adult Day Treatment - Specialized	59	51	Alternative Care Facility	313	173	Day Habilitation - Specialized Habilitation	126	95	Day Habilitation - Supported Community Connections	170	118	Residential Habilitation - Group	55	48	Residential Habilitation - Individual	104	82	Residential Habilitation - Host Home	101	80	Supported Living Program	6	6	Prevocational Services	32	30	Supported Employment - Group	66	56	Supported Employment - Individual	84	69	Total Providers	1,167	854	Once on-site survey are complete the Department will then finalize the remedial action plan.
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15 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	7/1/2016	The Department, CMAs, including SEPs and CCBs, 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	Currently the Department has a list of providers that vary in compliance levels, the Department is analyzing data and preparing a list of settings that do not meet setting requirements to submit to CMS under heightened scrutiny. The Department designated contractor, The Lewin Group will be delivering a process for Heightened Scrutiny submission as a part of the '15-'16 contract to the Department 1/01/16	Heightened scrutiny determination will be made once site visits concluded.																																													
2. Modifications to Licensure and Certification rules and operations																																																		
16 Assessment and Outcomes of settings within licensure and certification process (provider enrollment)	4/1/2015	1/1/2017	The Department, CMAs, including SEPs and CCBs, 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	Currently gathering data, evaluating and discussing with CDPHE																																														

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17 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.	1/1/2016	1/1/2017	The Department, CMAs, including SEPs and CCBs, 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	Currently gathering data, evaluating and discussing with CDPHE	
18 Work with the Division of Housing to develop 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.	5/1/2015	12/1/2016	The Department, CMAs, including SEPs and CCBs, 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	Currently working with the Colorado Department of Housing (DOH), stakeholders and CDPHE in discussing options and implementation. A draft template with minimum requirements for a residential agreement has been compiled by Department staff. It includes information from the Colorado Residential model lease, a model lease from the Department of Housing and Urban Development, as well as an existing comprehensive residential agreement from a residential provider. This document is being reviewed by The Department's legal staff.	
19 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	3/15/2019	The Department, CMAs, including SEPs and CCBs, 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	Currently working with stakeholders and CDPHE to update the certification standards and frequency of review.	
3.Modifications to enrollment/re-enrollment procedures					
20 Strengthen enrollment and re-enrollment revalidation procedures to identify settings that may have indicators of non-compliance and require more thorough review.	11/1/2015	3/1/2017	The Department, CMAs, including SEPs and CCBs, 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		
4. Revisions to HCBS waiver applications and Colorado regulations					
21 Determine whether state regulations, policies and/or legislation are in compliance and target dates for changes	5/21/2014	6/30/2016	The Department, CMAs, including SEPs and CCBs, 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	Recommendations across all waivers and related regulations, statutes, and other authorities were provided to The Department by The Lewin Group. These recommendations will be integrated into both internal and external meetings to further understand potential changes. Generally, for all waivers, recommendations include exploration and possible modification of waivers to better include/define participant rights, informed choice and person centered practices. The Department is currently reviewing the <i>suggested</i> changes. The Department will further analyze the data and put together a timeline for implementing changes.	
22 Explore all waivers and potentially add participant rights within regulations consistent across all programs when applicable.	11/1/2015	3/15/2019	The Department, CMAs, including SEPs and CCBs, 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	Recommendations across all waivers and related regulations, statutes, and other authorities were provided to The Department by The Lewin Group. These recommendations will be integrated into both internal and external meetings to further understand potential changes. Generally, for all waivers, recommendations include exploration and possible modification of waivers to better include/define participant rights, informed choice and person centered practices. The Department is currently reviewing the <i>suggested</i> changes. The Department will further analyze the data and put together a timeline for implementing changes.	The Department is working with CDPHE to add language to on-going surveys
23 Modify waivers and regulations to ensure participant choice and strengthen participant protections.	11/1/2015	3/15/2019	The Department, CMAs, including SEPs and CCBs, 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	Recommendations across all waivers and related regulations, statutes, and other authorities were provided to The Department by The Lewin Group. These recommendations will be integrated into both internal and external meetings to further understand potential changes. Generally, for all waivers, recommendations include exploration and possible modification of waivers to better include/define participant rights, informed choice and person centered practices. The Department is currently reviewing the <i>suggested</i> changes. The Department will further analyze the data and put together a timeline for implementing changes.	
24 Require provider and CMA (including SEP and CCB) staff training on Person Centered Planning, philosophy and practice.	3/1/2015	3/15/2019	The Department, The Lewin Group, CMAs, including SEPs and CCBs	Webinar trainings regarding PCP requirements, have been conducted. Trainings will be ongoing. All trainings are recorded and are published on the Colorado State Transition website (https://www.colorado.gov/hcpf/home-and-community-based-services-settings-final-rule) so this information can be utilized by Stakeholders when it is needed.	Webinars have been well-attended.
25 Provide clarity on the need for all residential settings to comply with home and community based settings requirements.	3/1/2015	12/1/2015 and ongoing there after	The Department and The Lewin Group	Webinar trainings have been conducted for all stakeholders focusing on person centered planning and providing clarification regarding the final rule. Initial trainings were conducted for providers of residential and non-residential services. Trainings will be ongoing, and recorded These recording will be posted on the Colorado State Transition website at: https://www.colorado.gov/hcpf/home-and-community-based-services-settings-final-rule . The next three trainings are as follows: Person Centered Planning-Tuesday October 20, 2015. Residential Provider Training- Friday, January 29, 2016. Non Residential Provider Training-Tuesday February 23, 2016.	Webinars have been well-attended.

Colorado Home and Community Based Services Statewide Transition Plan (STP) - November 16, 2015

Action Item	Start Date	Projected End Date	Key Stakeholders	Progress/Status	Findings/Results/Outcomes
26 Expand community integration opportunities for participants using adult day health and include desired outcomes and required provisions within regulations.	11/1/2015	3/15/2019	The Department, CMAs, including SEPs and CCBs, Program Approved Service Agencies, Directors meeting, Alliance, Assisted Living Residences, Arc of Colorado, PADCO, Self-Advocacy Network, Advocacy Communication Group, Participant Directed, Waiver Simplification, Brain Injury Stakeholder Workgroup, Mental Health Centers, BHO, The Lewin Group, CDPHE	The Department will collect best practices in this area through Stakeholder Engagement Workgroups beginning in November 2015.	On November 9, 2015, HCPF and Lewin hosted two in-person stakeholder workgroups, one relating to residential services and the other relating to non-residential services, to discuss best practices and other issues for implementing the HCBS rule. With respect to expanding community integration opportunities, informed choice, and participant rights in all settings effected by the Rule. The workgroups were tasked with reviewing the corresponding residential and non-residential CMS exploratory questions and giving examples of best practices they had observed or heard of under the areas of Community Integration, Informed Choice, and Participant Rights. The workgroups will continue to meet virtually (by phone/webinar) every month through March 2016.
27 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	3/15/2019	The Department, CMAs, including SEPs and CCBs	The Department has a list of suggested changes. The department will further analyze the list and put together a timeline for implementing changes.	
28 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 may have the effect of "isolating". Modify policy related to larger facilities to be more like Individual Residential Support Services (IRSS).	11/1/2015	3/15/2019	The Department, CMAs, including SEPs and CCBs, 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		
29 Modification to the rules concerning RCCF and group homes in the CHRP waiver will be utilized to strengthen person-centered planning processes. Additionally, align financial and dietary rights with the DD waiver when appropriate by age or court order.	1/1/2015	3/15/2019	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	The Department has begun to work with its sister agency, The Colorado Department of Human Services (DHS) who administer the CHRP waiver to review setting and setting requirements. This information will allow the Department and DHS to create a timeline for implementation.	
30 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	12/15/2018	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	The Department and DHS are currently working to understand how the rule can and will impact the CHRP waiver and the restriction that are inherently in place due to the statutes that govern the Colorado Foster Care system as well as statute and laws that restrict choice youth can make.	
31 For CHRP, expand Individual Choice Statement described in the waiver 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	12/15/2018	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	The Department and DHS are currently working to understand how the rule can and will impact the CHRP waiver and the restriction that are inherently in place due to the statutes that govern the Colorado Foster Care system as well as statute and laws that restrict choice youth can make.	
32 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	1/15/2018	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	The Department and DHS are currently working to understand how the rule can and will impact the CHRP waiver and the restriction that are inherently in place due to the statutes that govern the Colorado Foster Care system as well as statute and laws that restrict choice youth can make.	
5.Enhancing training and technical assistance					
33 Conduct a webinar series to highlight the settings requirements (residential, non-residential, adults, children) and principles of person-centered planning.	1/1/2015	Completed 6/30/2015	The Department, CMAs, including SEPs and CCBs, 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	Webinar trainings have been completed for all stakeholders focusing on person centered planning and providing clarification regarding the final rule for residential and non-residential settings. Additional training opportunities and workgroup activity is expected over the course of the next year. Topics for training and workgroup activities will be selected from assessment findings, site visit results, and other remedial actions.	Webinars have been well-attended.
34 Provide strategic technical assistance to all key stakeholders 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	Completed 6/30/2015 and ongoing	The Department, The Lewin Group	Completed-The Department will continue to update these documents. All documents will be posted to the Departments external website. Additional FAQs and other messaging documents are expected over the course of the next year to further inform and update providers, individuals and other stakeholders on ongoing rule compliance.	
35 Provide training to licensure/certification staff on new settings requirements.	1/1/2016	11/1/2018	The Department, The Lewin Group, CDPHE		
36 Provide training to quality improvement staff on new settings outcomes measures.	1/1/2017	11/1/2018	The Department, The Lewin Group, CDPHE		
37 Provide training to enrollment staff to heightened scrutiny of new providers/facilities.	1/1/2016	11/1/2018	The Department, The Lewin Group, CDPHE		
38 Develop and include ongoing provider training on rights, protections, person-centered thinking, and community inclusion.	3/1/2015	3/15/2019 and ongoing	The Department, The Lewin Group, CDPHE	Webinar trainings have been administered for all stakeholders focusing on person centered planning and providing clarification regarding the final rule for residential and non-residential setting. Trainings will be ongoing and incorporate needs of providers, and other stakeholders.	Webinars have been well-attended.
39 Provide training to case managers through CMAs, including SEPs and 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.	3/1/2015	1/1/2017	The Department, DSS, CMAs, including SEPs and CCBs	Webinar trainings have been administered for all stakeholders involving: person centered planning, clarification regarding the final rule for residential and non-residential setting. More targeted training and support to case managers is expected over the course of the next year.	Webinars have been well-attended.
Program Component: Inclusion of Requirements within the HCBS Quality Framework					
40 Include outcomes measures on settings within the current 1915c waiver quality improvement system.	6/1/2017	1/1/2018	The Department, CDPHE		
41 Develop a provider scorecard.	10/1/2014	Completed 7/1/2015	The Department, HCBS Providers, CDPHE, Communication Department	Completed. A set of provider scorecards are available for review at https://www.colorado.gov/hcpf/home-and-community-based-services-settings-final-rule .	Provider Scorecards available and posted to website at https://www.colorado.gov/hcpf/home-and-community-based-services-settings-final-rule
42 Monitor data from Quality of Life and National Core Indicators (NCI) related to outcomes (e.g. opportunities for "informed" choice, choice of roommate and setting, freedom from coercion).	1/1/2016	3/15/2019	The Department		

Colorado Home and Community Based Services Statewide Transition Plan (STP) - November 16, 2015

Action Item	Start Date	Projected End Date	Key Stakeholders	Progress/Status	Findings/Results/Outcomes
43 Monitor person-centered planning and integrated employment requirements through a routine review of data to measure effectiveness of supports.	6/1/2017	3/15/2019	The Department, CDPHE		
44 Progress review and update of Statewide Transition Plan.	8/1/2015	3/15/2019	The Department, The Lewin Group	last updated 11/16/2015. The Department will continue to update and incorporate additional information at least quarterly or as information becomes available	
45 Review survey cycles for HCBS providers.	6/1/2016	7/1/2018	The Department, CDPHE	Working with CDPHE to review survey cycles	
Program Component: Managing Provider Transition Plans					
46 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	11/1/2017	The Department, The Lewin Group, CDPHE, CMAs, including SEPs and CCBs	The Department along with the Lewin Group has developed a protocol and draft template for managing non-compliance with the HCBS Settings Rule. Providers will be scored based on factors of isolation, informed choice, and participant rights and will be required based on that score to complete a provider transition plan.	
47 Include ongoing updates within the provider scorecard.	8/1/2015	3/15/2019	The Department, The Lewin Group, CMAs, including SEPs and CCBs, CDPHE, stakeholders and interested parties.	Provider score cards will be updated quarterly and will be employed beyond 2019 for ongoing monitoring.	
48 Develop remedial strategies and on-going monitoring procedures for providers who do not meet requirements.	12/1/2015	5/1/2017	The Department, The Lewin Group, CDPHE	The Department along with the Lewin Group has developed a protocol and draft template for managing on-going non-compliance issues with the HCBS Setting Rule. Providers will be scored based on factors of isolation, informed choice, and participant rights and will be required based on that score to complete a Provider Transition Plan (PTP). Ongoing use of provider scorecards and the Individual & Family Survey will contribute to ongoing compliance monitoring.	Provider Transition Plan (PTP) - is a plan developed by Medicaid HCBS Providers and approved by the Department. The PTP is a plan showing how a Medicaid HCBS Provider will come into compliance and how they will support the individuals served in the transition process. The PTP will include milestones needed to address any non-compliance and timelines for each milestone. Possible Department assistance in connection with remedial actions may include: Site visit, Meeting with provider to identify potential solutions for compliance, provide technical assistance and support toward Provider Transition Plan, initiate targeted Individual/Family survey, Regional stakeholder action groups to identify innovations and problem solve challenges, In-person training, Webinar training, Fact sheets, frequently asked questions document, slide decks, website with innovation corner, Modifications to regulations and policies
49 Heightened Scrutiny process	11/1/2015	4/1/2018	The Department, The Lewin Group, CDPHE, Program Approved Service providers, Community Stakeholders	The Department is working with the Lewin Group to develop these processes and will use the data found from the two Provider Surveys along with on-site Surveys to create a comprehensive list of the Provider Settings that the Department feels should be put through the Heightened Scrutiny process because they are fully integrated into their communities but may be on the same ground as an institution. Currently the Department has a list of providers that vary in compliance levels, the Department is analyzing data and preparing a list of settings that do not meet setting requirements to submit to CMS under heightened scrutiny. The Department designated contractor, The Lewin Group will be delivering a process for Heightened Scrutiny submission as a part of the '15-'16 contract to the Department 1/01/16	
50 Develop a process for helping individuals to transition to new settings as appropriate.	1/1/2017	11/1/2018	The Department, CMAs, including SEPs and CCBs, 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	The Department is looking into the possibility of applying a similar framework to what is currently used by the CCT/CTS program. While this program focuses on transitioning from institutional to community settings, the lessons and processes can be adapted for what is needed to comply with the HCBS Settings Rule. The Department will require Service Providers, that are not already compliant with the HCBS Final Setting Rule, to utilize a ITP to support the individual being served in this transition	Individual Transition Plan (ITP) - is a plan developed with an individual receiving services to identify the supports needed by the individual while the services setting they currently utilize is coming into compliance or the supports needed to transition the individual to a new setting. Included in this ITP will be assurances that the beneficiary received reasonable notice and due process in their transition, that the beneficiaries are given the opportunity, information, and supports to make informed choice of an alternate setting, and that critical services/supports are in place in advance of the individual's transition. The timeline for relocation and the number of beneficiaries impacted have not yet been determined.