



# HCBS Settings Final Rule Quarterly Update for Quarter Ending 9/30/17

---

- Documents CMS can expect shortly
  - More detailed responses to public comments from June 2016 on the third version of the Statewide Transition Plan (STP.3) and the first version of the Systemic Assessment Crosswalk. By email dated May 25, 2017, CMS confirmed that the only item required for initial approval of the STP and Crosswalk was the Department's more detailed responses.
  - Milestones for CMS's standardized tracking system.
  - Both of the above documents are in clearance and will be published on the Department's website and submitted to CMS as soon as clearance is complete.
- Site-specific assessment projects
  - The Department converted the Provider Transition Plan (PTP) from an Excel workbook into a web-based SharePoint form to make it easier for providers to complete and easier for the Department to pull real-time, aggregate data about providers' compliance status. The Department took the conversion as an opportunity to update the PTP by adding compliance issues, potential remedial action plans, and inquiries to providers about the potential costs of compliance with the Settings Final Rule.
  - The Department built a functional PTP platform in SharePoint and, with its partners at the Colorado Department of Public Health and Environment (CDPHE), has been using it to record information gathered from recent site visits. With its contractor Lewin Group, the Department has also been entering data from older site visits and PTPs.
  - Unfortunately, as noted in a voicemail to Jessica Loehr in August 2017, a technical problem has delayed the Department from inviting providers to join the system and work on their PTPs directly. The problem relates to item-level permissions (*i.e.*, security settings that allow each provider to see its own PTP information and nobody else's).
  - After studying the available options, the Department has decided to rebuild the PTP system on a different platform. The Department is working with staff



in the Governor's Office of Information Technology (OIT) on a plan to rebuild the PTP system using Google's G-Suite platform as quickly as possible.

- In the meantime, a pdf of what the updated PTP looks like on SharePoint is available on the Department's [website](#). The Department has been encouraging providers to review this pdf so that when the new web-based system is up and running, they will already have thought through the kinds of compliance issues and remedial action plans that might be relevant to their situation. The Department also welcomes CMS's comments on this pdf. (This pdf shows the PTP for adult residential settings. The PTPs for nonresidential and children's residential settings will employ a similar structure, with some different items for providers to consider.)
- With the Department's input, CDPHE is continuing to provide site-specific guidance to providers that request site visits or are selected for a visit on other grounds (*e.g.*, concerns expressed in the Individual/Family/Advocate (IFA) Survey or otherwise brought to the departments' attention).
- IFA Survey
  - As stated in an August 30, 2017 Communication Brief sent out to all HCBS stakeholders, the Department has published a [report](#) on the first two years' worth of IFA Survey results. The Department has encouraged all interested stakeholders to review the report. The Department has also shared the report with CDPHE so that site visit teams can be aware of the concerns expressed by people receiving services. In addition, the Department plans to address the most commonly cited issues in its upcoming answers to Frequently Asked Questions (FAQs).
  - In the survey, respondents could write in additional information in open-ended text boxes. The Department and CDPHE have reviewed this information, which was not published because of the need to protect respondents' anonymity and potential personal health information. The two departments are using this information to identify potential additional site visits and other follow-up actions.
  - As stated in the August Communication Brief cited above, the Department has also rolled out a revised version of the IFA Survey. The revisions take into account public comments on the survey, additional criteria of the HCBS Settings Final Rule, and components of the HCBS Consumer Assessment of Healthcare Providers and Systems (CAHPS) Survey published by CMS in October 2016, among other things. The revised survey has been translated into Russian, as well as the already-available Spanish, in order to enhance its accessibility to stakeholders. Links to the hard-copy and online formats of



the survey are on the Department's [website](#) under the header "Individual/Family/Advocate (IFA) Survey."

- In late August – early September 2017, the Department issued an instruction to case management agencies serving Medicaid waiver participants, including Community Centered Boards (CCBs), Single Entry Points (SEPs), and counties involved in the Children's Habilitation Residential Program (CHRP) Waiver. The instruction read: "Once per quarter until March 2020, please remind the individuals with whom you work, as well as any of their family members and friends with whom you have contact, that the IFA Survey is available to them and that they may take this voluntary survey as often as they wish. Please make a note of each reminder in the Log Notes field of the Benefits Utilization System (BUS), for CCBs and SEPs, or the Trails system, for CHRP case workers."

