



Quarterly update for quarter ending 3/31/17

- Thank you for taking the time on March 21 and 29 to discuss by phone your February 9 feedback on our statewide transition plan (STP.4) and systemic assessment crosswalk.
- We are currently reviewing and considering your feedback, as well as public comments received during the public comment period on STP.4 and the crosswalk (the comment period closed on March 23). We are, in addition, reviewing evidence submitted to the Medicaid Provider Rate Review Advisory Committee (MPRRAC), which is currently reviewing rates for Home- and Community-Based Services (HCBS), and which heard some testimony relating to potential increased costs under the HCBS Settings Final Rule.
- We ultimately expect to publish online and to submit to the Centers for Medicare & Medicaid Services (CMS) a more detailed response to the public comments received during the summer of 2016 (which have already been addressed in summary form), a response to the comments received during the public comment period that ended on March 23, a revised STP (STP.5), an updated crosswalk, and an updated and more comprehensive communication plan. We are considering your additional guidance of March 29 (by phone) and 31 (by email) regarding potentially submitting just the first item in order to receive initial approval of our STP, followed by the remaining items in due course.
- The Department updated its STP website (www.colorado.gov/hcpf/home-and-community-based-services-settings-final-rule) during the first two weeks of March to provide more comprehensive, current, and clearly organized information relating to Colorado's implementation of the HCBS Final Settings Rule. In addition to updating and reorganizing information previously posted on two STP-related websites, the revised website provides new information about various provider and stakeholder meetings at which interested parties may ask about or comment on STP-related issues. The Department has also encouraged participants in provider and other stakeholder meetings to refer to the updated website.
- Site-specific assessment projects
 - As stated in STP.4, the Department's site-selection methodology requires about 314 site visits to be completed. During April-June 2016, Telligen (a contractor) completed 57 site visits, and during July 2016-February 2017, the Colorado Department of Public Health and Environment (CDPHE)



completed 216 site visits, for a total of 273 site visits completed by the end of February 2017. Some of the visits completed by Telligen and CDPHE relatively early in the process are not counted toward the required total of 314, although they were helpful for purposes of providing guidance to providers and refining the site visit process.

- Approximately 300 Provider Transition Plans (PTPs) were completed by the end of March 2017. All PTPs completed to date have been completed in connection with site visits.
- Drawing on feedback from providers and CDPHE, which is working with providers to complete PTPs, the Department has been updating and revising the PTP templates. These revisions include converting the PTP templates from Excel files to a web-based form that should be easier for providers to complete and should allow for faster and more complete tracking and reporting by the Department. The Department expects to roll out the web-based PTP for adult residential settings first, with the web-based PTPs for nonresidential and children's residential settings to follow. In all, the Department expects to receive over 3000 PTPs (most of which will be completed for settings not receiving a site visit). CDPHE will help review and verify these PTPs.
- Systemic assessment projects
 - As soon as we determine the extent of any necessary changes to the crosswalk and whether to submit it with or after the more detailed responses to the June 2016 public comments, we will let you know our expected timing for submission of any updated crosswalk.
 - The Department is working with CDPHE to draft answers to frequently asked questions (FAQs) about application of the HCBS Final Settings Rule and/or the proposals set forth in the crosswalk to various situations. The Department expects to issue the FAQs on a rolling basis over the coming months.
 - The Department has been encouraging providers and other interested parties to submit information about the costs of coming into compliance with the HCBS Settings Rule. During provider and other stakeholder meetings during the first few months of 2017, Department staff noted that such information could be submitted during the public comment period on the STP and crosswalk, and/or in connection with the March 17, 2017 MPRRAC meeting, which focused on HCBS rates. In addition, CDPHE is collecting provider feedback about potential cost increases when it conducts site visits. The Department is reviewing the information



- received so that it can prepare budget requests and proposed waiver amendments if necessary.
- As stated in our last quarterly update, the Department would be grateful for CMS's feedback on the sample completed PTPs sent by Lori Thompson to Serena Lowe at the Administration for Community Living (ACL) over the summer of 2016. The Department hopes to use this process to ensure that remedial action plans without cost impacts can be sufficient in some cases, and to better understand the potential for any significant cost impacts.

