

**Georgia Home and Community Based Services (HCBS) Transition Plan
Independent Care Waiver Program (ICWP)**

| Section 1. Identification | | | | | | |
|--|--|-------------------|-----------------|---|---|---|
| <i>Action Item</i> | <i>Description</i> | <i>Start Date</i> | <i>End Date</i> | <i>Sources</i> | <i>Key Stakeholders</i> | <i>Intervention/ Outcome</i> |
| Obtain active provider breakdown by site | State identifies HCBS service provider listing by site to include contact information and service by site using category of service. | 7/1/14 | 7/15/14 | Department of Community Health (DCH) Decision Support Services (DSS) system | DCH Policy and information technology unit | Consolidated and verified HCBS Setting Inventory |
| Development of Provider Self-Assessment tool | State develops self-assessment tool for providers to evaluate conformity to and compliance with HCBS rules. | 7/1/14 | 7/31/14 | HCBS guidance, State developed assessment tools (Iowa/Nevada), CMS Guidance | DCH Policy Unit, ICWP Provider Network, ICWP Advisory Committee, ICWP Case Managers | Assessment tool vetted by key stakeholders |
| Submit E&D Waiver Amendment | Submit Waiver Amendment to Centers For Medicare and Medicaid Services (CMS) following public comment period on transition plan. | 7/15/14 | 8/30/14 | CMS Waiver Document | DCH Policy Unit, ICWP Provider Network, ICWP Advisory Committee, ICWP Case Managers | Initial ICWP Waiver Amendment |
| Test and refine Assessment tool | Pilot self-administration of tool to ensure it adequately captures needed elements and is easily and accurately completed by providers. | 8/30/14 | 9/15/14 | HCBS guidance, public input, key stakeholder input | ICWP Advisory Committee | Validated tool |
| Other standards identification | Design with stakeholder input a comprehensive set of provider standards (credentialing, licensing, policies, training curricula, etc.) to be reviewed and validated to conform to HCBS rule. | 9/16/14 | 10/31/14 | Key stakeholder input, existing provider standards | DCH Policy Unit, ICWP Provider Network, ICWP Advisory Committee, ICWP Case Managers | Provider Standards for enrollment and continued participation |
| Design electronic | Develop electronic version | 9/16/14 | 10/31/14 | Contracted DCH IT tool | DCH Policy Unit, DCH IT, | Electronic tool |

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| tool | of tool for efficient collection and analysis of data. | | | | and DSS experts | |
| Incorporation of Assessment tool into Provider enrollment policy and application | State incorporates self-assessment requirement into provider enrollment and policy at DCH. | 11/1/14 | 11/30/14 | HCBS Guidance, Healthcare Facility Regulations, Existing provider enrollment policy at DCH | DCH Policy Unit, ICWP Provider Network, ICWP Advisory Committee, ICWP Case Managers | Expectations for compliance are clearly outlined in Policy. |

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| Section 2. Assessment | | | | | | |
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| Enrolled active HCBS Providers complete self-assessment | All active enrolled HCBS providers will submit the provider self-assessment tool to DCH. | 9/1/14 | 10/31/14 | Assessment Tool, HCBS Provider Network staff | DCH Policy Unit, ICWP Provider Network, ICWP Advisory Committee, ICWP Case Managers | 100% of HCBS providers complete self-evaluation |
| Other standards Assessment | Assess what changes are required to update provider qualification standards, licensure regulations, enrollment education and provider training, and other related policies, etc. to conform to HCBS rule. | 10/1/14 | 12/31/14 | Key stakeholder input, existing provider standards | DCH Policy Unit, ICWP Provider Network, ICWP Advisory Committee, ICWP Case Managers | Provider Standards for enrollment and continued participation |
| Self-assessment data is compiled and analyzed | DCH Policy Unit compiles the self-assessment data to determine those HCBS services providers who meet, do not meet, and could come into compliance with HCBS guidance. | 11/1/14 | 12/31/14 | Self-assessment tool, Sharepoint | DCH Policy Unit | Report of findings and augmented Setting inventory to include compliance status |
| Case management entities validate a representative sample of self-assessments | Case management agencies validate a state determined percentage of provider self-assessments for validity. | 11/1/14 | 11/30/14 | Self-assessment tool, ICWP Case Management Agencies and case managers | DCH Policy Unit, Georgia Medical Care Foundation (GMCF), Case Managers, Direct Service Providers | Minimum 5% random sampling of assessment data collected to test reliability |
| Validated self-assessment data | Initial assessment data compared to validation data. | 12/1/14 | 12/31/14 | Self-assessment tool, Sharepoint | DCH Policy Unit | Report of finding, accuracy, and |

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| is compiled and analyzed | DCH Policy Unit compiles the self-assessment data to determine those HCBS services providers who meet, do not meet, and could come into compliance with HCBS guidance. | | | | | reliability of tool and outcome data. |
| Assessment Results and Report Presentation | State will formally present the results of the assessment data to stakeholders and post on relevant websites. | 1/1/15 | 1/31/15 | Self-assessment tool, Sharepoint, data analysis | DCH Policy Unit, DCH Communications, GMCF, ICWP Advisory Committee | Public distribution/ awareness of the state of the state of HCBS setting compliance |

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| Section 3: Remediation | | | | | | |
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| Comprehensive Transition Plan | Develop a Transition Plan package to include a project management plan and narrative white paper that summarizes the state of the state at the end of the initial assessment period, establishes a plan for comprehensively addressing all components of compliance with HCBS rule and describes the state's related mission and values. | 7/15/14 | 12/31/15 | Assessment results, key stakeholder input results, waiver document | DCH Policy Unit, GMCF, ICWP Provider Network, ICWP Advisory Committee, ICWP Case Managers | Fully developed statewide transition plan |
| Submit Waiver Plan Amendment to CMS | DCH will submit a waiver amendment that outlines remediation strategies for those HCBS providers not in compliance with HCBS regulations. | 12/1/14 | 12/31/14 | Assessment results, key stakeholder input results, waiver document | DCH Policy Unit, GMCF, ICWP Provider Network, ICWP Advisory Committee, ICWP Case Managers | Waiver amendment with fully developed remediation strategy |
| Policy Development | State will develop revised policies and procedures to address ongoing monitoring and compliance. | 1/1/15 | 3/31/15 | DCH and DHS Legal | Members, Advocates, DCH Policy Unit, GMCF, ICWP Provider Network, ICWP Advisory Committee, ICWP Case Managers | Establish adverse action and appeals processes applicable to providers who fail to comply with HCBS rule |
| Other standards Remediation | Design, adopt, and implement plan for | 1/1/15 | 6/30/15 | Key stakeholder input, existing provider | DCH Policy Unit, GMCF, ICWP Advisory | Provider Standards for |

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| | achieving comprehensive compliance of provider standards with HCBS rule (credentialing, licensing, policies, etc.) | | | standards | Committee, DCH Provider Enrollment, GMCF | enrollment and continued participation |
| Provider Training and Education | Design and implement plan for incorporating necessary training and education into provider enrollment orientation and provider employee training AND provide training to providers on implementation | 1/15/15 | 6/30/15 | Key stakeholder input, existing provider standards | DCH Policy Unit, ICWP Provider Network, ICWP Advisory Committee, ICWP Case Managers | Educated providers on new rule |
| Ongoing Monitoring of compliance | State will incorporate HCBS requirements into policy and consumer satisfaction surveys to identify areas of non-compliance. | 02/15/15 | Ongoing | DCH policy manuals, Consumer satisfaction surveys | DCH Policy Unit, DCH Program Integrity | Ongoing Program Integrity and Provider Compliance Audits |

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| Section 4: Outreach and Engagement | | | | | | |
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| Initial plan developed | Immediate stakeholder input gathered to adjust this originally drafted plan. | 7/15/14 | 8/30/14 | CMS written guidance and TA; DCH staff | DCH Policy Unit, ICWP Provider Network, ICWP Advisory Committee, ICWP Case Managers | Consensus and adoption of initially proposed plan methodology |
| Public Notice-- Assessment Plan Review | DCH makes public notice through multiple venues to share overarching Transition Plan and proposed method of assessment per HCBS guidance including banner messaging, website posting, regional Medicaid office postings in conjunction with immediate waiver amendment to incorporate additional slots, rate increases, and quality incentive program. | 07/31/14 | 08/30/14 | Section 1 of Proposed HCBS Transition Plan | Members, Advocates, DCH Policy Unit, GMCF, ICWP Provider Network, ICWP Advisory Committee, ICWP Case Managers | Public Notice with transition plan |
| Public Comment-- Transition Plan | DCH commences collection of public comment through multiple methods and makes appropriate changes to assessment tool and plan. Comments will be taken in person, via fax, email, or website submission. | 7/31/14 | 8/30/14 | Section 1 of Proposed HCBS Transition Plan | DCH Policy Unit, DCH Communications | Public notice posted with transition plan |
| Public Comment-- Collection and | DCH incorporates appropriate changes to the | 8/31/14 | 9/15/14 | Section 1 of the Proposed HCBS | DCH Policy Unit, GMCF, ICWP Advisory | Completed transition plan |

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| plan revisions | initial transition plan based on public comments. | | | Transition Plan | Committee | |
| Public Comment--Retention | DCH will safely store public comments and state responses for CMS and the general public. | 8/31/14 | Ongoing | Public Comments and State Response documents | DCH Policy Unit | Public comments stored |
| Posting of revisions to initial document | DCH will post the rationale behind any substantive change to the transition plan. | 9/15/14 | Ongoing | Public Comments and State Response documents | DCH Policy Unit, DCH Communications | Posted rationale |
| Stakeholder training and education | Design, schedule, and conduct training for individual recipients of waiver services, their families and similarly situated stakeholders on waiver compliance, changes they can expect to see and which will affect their services. | 9/15/14 | 4/30/2015 | Statewide Transition Plan and resulting products | Members, Families, Advocates | Member understanding of changes to expect |
| Public Comment—Ongoing input | DCH will leverage various stakeholders groups to periodically present and seek feedback to comprehensive Transition Plan development in preparation for Waiver | 9/15/14 | Ongoing | Public Comments and State Response documents | Members, Advocates, DCH Policy Unit, GMCF, ICWP Provider Network, ICWP Advisory Committee, ICWP Case Managers organizations | Public comments for incorporation into policy and regulations |