

# Now & COMP Waiver Amendment Overview

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*Report to the*  
**DD Advisory Council**

***September 19, 2014***

# DBHDD Vision & Goal

- Vision -** Every person who participates in our services leads a satisfying, independent life with dignity and respect.
- Goal -** The goal is for all transitioned individuals to receive adequate services and supports in the community and to achieve independence, integration, and a meaningful life.

# Significant Features of the Waiver Amendments

- *Increases rates for the following services by 2%*
  - Community Access Services
  - Prevocational Services
  - Supported Employment Services
  - Community Residential Services
  - Community Living Support Services
  - Support Coordination
- *Submits two new services for CMS consideration*
- *Separates skilled nursing services from the context of community residential and community living services*

# Waiver Amendment Changes

Approved Waiver	Waiver Amendment
<p><b>Nursing Services</b> only available within Community Living Supports and Community Residential Services</p>	<p><b>Nursing Services</b> available as a <i>stand-alone service</i> regardless of setting</p>
<p><b>Behavioral Supports Consultation</b> Maximum units: 108 <i>Only available in home setting</i></p>	<p><b>Behavioral Supports Consultation</b> Maximum units: 96 <i>Available in all settings</i> <i>No rate change. \$94/hour</i></p>
<p><b>Behavioral Supports Services</b> Not available</p>	<p><b>Behavioral Supports Services</b> Maximum units: 96 Available in all settings Compliments BSC <i>Rate: \$75/hour</i></p>
<p><b>Intensive Support Coordination</b> Not available</p>	<p><b>Intensive Support Coordination</b> Provides medical/behavioral coordination for high risk individuals</p>

# Final Rule

## CMS 2249-F and CMS 2296-F

Published in the Federal Register on January 16, 2014

Title:

*Medicaid Program; State Plan Home and Community-Based Services, 5-Year Period for Waivers, Provider Payment Reassignment, and Home and Community-Based Setting Requirements for Community First Choice (Section 1915(k) of the Act) and Home and Community-Based Services (HCBS) Waivers (Section 1915(c) of the Act)*

# Georgia Home and Community Based Services(HCBS) Transition Plan

*Developmental/Intellectual Disabilities  
Waiver Programs: New Options Waiver  
& Community Supports Waiver*

*Submitted to CMS 9/18/14*

Section 1. Identification						
Action Item	Description	Start Date	End Date	Sources	Key Stakeholders	Intervention/ Outcome
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.	9/15/14	10/1/14	Department of Community Health (DCH) Decision Support Services (DSS) system	Department of Behavioral Health and Developmental Disabilities (DBHDD), 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.	7/15/14	9/30/14	HCBS guidance, State developed assessment tools (Iowa/Nevada), CMS Guidance	DCH Policy Unit, DBHDD Provider Network Management, Division of Developmental Disabilities	Assessment tool vetted by key stakeholders
Submit NOW & COMP Waiver Amendments	Submit Waiver Amendments to Centers For Medicare and Medicaid Services (CMS) following public comment period on transition plan.	7/1/14	9/17/14	CMS Waiver Document	DCH Policy Unit, DBHDD, DD Provider Network, Support Coordination	Initial NOW and COMP Waiver Amendments
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.	9/16/14	10/15/14	HCBS guidance, public input, key stakeholder input	DD Provider Network, Provider organizations, Family members and other advocates	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.	9/1/14	10/31/14	Key stakeholder input, existing provider standards	DCH Policy Unit, DBHDD, DCH Provider Enrollment, DBHDD Provider Network Management	Provider Standards for enrollment and continued participation



DBHDD

Section 2. Assessment						
Action Item	Description	Start Date	End Date	Sources	Key Stakeholders	Intervention/ Outcome
<b>Enrolled active HCBS Providers complete self-assessment</b>	All active enrolled HCBS providers will submit the provider self-assessment tool to DCH.	9/15/14	10/31/14	Assessment Tool, HCBS Provider Network staff	DCH Policy Unit, DBHDD, Support Coordination, Provider organizations	100% of HCBS providers complete self-evaluation
Member and Advocate supplemental assessment of provider compliance	Member and advocates engaged to complete supplemental assessment of provider compliance to HCBS standards	9/1/14	ongoing	Assessment tool, Medicaid members, families	Member, Families, Advocates, DCH Policy Unit, DBHDD Provider Network Management, Division of Developmental Disabilities	Provide supplemental information for DCH GAP analysis
<b>Other standards Assessment</b>	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.	11/1/14	12/31/14	Key stakeholder input, existing provider standards	DCH Policy Unit, DBHDD Training and Education, DCH Healthcare Facilities Regulations Division, DCH Provider Enrollment, DAS Provider Enrollment	Provider Standards for enrollment and continued participation
<b>Support Coordination entities validate a representative sample of self-assessments</b>	Support Coordination agencies/Regional Offices validate a state determined percentage of provider self-assessments for validity.	11/1/14	12/15/14	Self-assessment tool, Support Coordinators, Regional Office Evaluation staff	DCH Policy Unit, DBHDD, Support Coordination, Direct Service Providers	Minimum 5% random sampling of assessment data collected to test reliability



Validated self-assessment data is compiled and analyzed	Initial assessment data compared to validation data. 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.	12/1/14	12/31/14	Self-assessment tool, Sharepoint	DCH Policy Unit, DBHDD	Report of finding, accuracy, and 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, DBHDD	Public distribution/ awareness of the state of the state of HCBS setting compliance

Section 3: Remediation						
Action Item	Description	Start Date	End Date	Sources	Key Stakeholders	Intervention/ Outcome
<b>Comprehensive Transition Plan</b>	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.	7/1/14	12/31/15	Assessment results, key stakeholder input results, waiver document	Members, Advocacy Groups, DCH Policy Unit, DBHDD, DD Provider Network, Support Coordination, DBHDD Statewide Quality Improvement Council	Fully developed statewide transition plan
<b>Submit Waiver Plan Amendments to CMS</b>	DCH will submit a waiver amendment that outlines remediation strategies for those HCBS providers not in compliance with HCBS regulations.	12/1/14	1/31/15	Assessment results, key stakeholder input results, waiver document	DCH Policy Unit, DBHDD	Waiver amendment with fully developed remediation strategy
<b>Policy Development</b>	State will develop revised policies and procedures to address ongoing monitoring and compliance.	1/1/15	3/31/15	DCH and DBHDD Legal	Members, Advocacy Groups, DCH Policy and Program Integrity Units, DBHDD Provider Network, Policy and Provider performance Units, DBHDD Human Rights and Advisory Councils	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 achieving comprehensive compliance of provider standards with HCBS rule (credentialing, licensing, policies, etc.)	1/1/15	6/30/15	Key stakeholder input, existing provider standards	DCH Policy Unit, DBHDD Policy and Training Units, DCH Provider Enrollment, DBHDD Provider Network	Provider Standards for 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	ongoing	Key stakeholder input, existing provider standards	DCH Policy Unit, DBHDD Policy and Training units, DCH Provider Enrollment, DBHDD Provider network Management, Provider Professional Organizations	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, DBHDD Quality Improvement Council	Ongoing Program Integrity and Provider Compliance Audits

Section 4: Outreach and Engagement						
Action Item	Description	Start Date	End Date	Sources	Key Stakeholders	Intervention/ Outcome
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, DBHDD	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 service(s) and rate increases.	07/10/14	09/11/14	Section 1 of Proposed HCBS Transition Plan	Members, Advocacy Groups, DCH Policy Unit DBHDD, DD Provider Network, Support Coordination, Provider organizations	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.	8/11/14	9/15/14	Section 1 of Proposed HCBS Transition Plan	DCH Policy Unit, DCH Communications, DBHDD	Public notice posted with transition plan



Public Comment-- Collection and plan revisions	DCH incorporates appropriate changes to the initial transition plan based on public comments.	8/15/14	9/16/14	Section 1 of the Proposed HCBS Transition Plan	DCH Policy Unit, DBHDD	Completed transition plan
Public Comment-- Retention	DCH will safely store public comments and state responses for CMS and the general public.	8/11/14	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.	8/1/14	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.	9/1/14	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 Amendment to incorporate comprehensive plan.	9/1/14	Ongoing	Public Comments and State Response documents	Members, Advocacy Groups, DCH Policy Unit, DBHDD, DD Provider Network, Support Coordination, Provider organizations	Public comments for incorporation into policy and regulations

# Full Transition Plan Available for comment:

<http://dch.georgia.gov/waivers>

*Series of public comment sessions upcoming  
Information also available:*

[http://dbhdd.georgia.gov/developmental-  
disabilities](http://dbhdd.georgia.gov/developmental-disabilities)

# Supported Employment

## FY'15 Supported Employment Initiatives

*Pilot Projects Update*

# Legislative Appropriated Funding Model for High School Transitions

## Individuals Identified

## Providers Identified

- Region 1- 10 4
- Region 2- 10 2
- Region 3- 10 3
- Region 4- 10 5
- Region 5- 10 1
- Region 6- 10 3

Total 60

18

# New Rate Funding Pilot

## Individuals Identified

- Region-1                    30
- Region-2                    0
- Region-3                    20
- Region-4                    10
- Region-5                    10
- Region-6                    0

**Total                    70**

## Volunteer Providers

- Region-1                    Chambers/CrossPlains/Cobb
- Region-2                    No Provider
- Region-3                    WOW, AADD
- Region-4                    Diversified
- Region-5                    CCDS
- Region-6                    No Provider

# Family Supports Model

## Number of Individuals

- Region -1            22
- Region -2            0
- Region -3            73
- Region -4            38
- Region -5            22
- Region -6            16

**Total            171**

## SE Providers

Cobb, GCSS

No Provider

GCSS

Easter Seal Southern GA

Unison

Middle Flint

# Supported Employment Leadership Network

## Update

# Primary Focus for 2014-15

- *Identified by the SELN membership:*
  - Education of families and individuals regarding options
- *Identified by the Division of DD:*
  - Memorandum of Understanding with identified roles and responsibilities of Office of Vocational Rehabilitation and DBHDD