

HCBS Transition Plan Matrix - Comprehensive

Applicable Waivers	Task	Regulatory Compliance Area	Action Item	Anticipated Start Date	Targeted Completion Date	Nebraska Health and Human Services Resources	Nebraska Health and Human Services Stakeholders	Expected Outcome
_All Waivers	Outreach	Plan Creation and Implementation	Draft a waiver transition plan.	07/01/2014	09/01/2014	Nebraska Administrative Code, HCBS Waivers, DHHS Internal Policies and Procedures, CMS Toolkit and Guidance, Transition Plan Consultant	DD Director, MLTC HCBS Administrator, Deputy Director of DD Community Based Services, MLTC Waiver Manager and other Waiver Team Staff, DD Waiver Administrator, DD Operations Administrator, DD QI Administrator, DD Technical Assistance Manager, DD Community Liaison	A comprehensive waiver transition plan is drafted that proposes actions necessary to ensure compliance with the new CMS HCBS rules, relevant timelines, resources, stakeholders, and expected outcomes. The transition plan is comprehensive, but is also severable by applicable waiver - so that, if necessary, the plan may be finalized in stages by waiver.
_All Waivers	Outreach	Plan Creation and Implementation	Make the waiver transition plan available for public comment.	09/03/2014	10/15/2014	DHHS Website, Omaha World Herald Newspaper Announcement, Direct Mailing to DD Service Participants, Direct Outreach to Providers	DHHS MLTC and DDD Staff	The draft comprehensive waiver transition plan is distributed via multiple mediums to engage and gather public comment for a time period to exceed 30 days.
_All Waivers	Outreach	Plan Creation and Implementation	Coordinate and hold public meetings.	08/01/2014	10/15/2014	Transition Plan, Powerpoint Presentations, Transition Plan Consultant	DHHS MLTC and DDD Staff	Stakeholders are able to attend public meetings where the new HCBS requirements are discussed and where they may participate in verbal comment and present questions related to the draft transition plan.
_All Waivers	Outreach	Plan Creation and Implementation	Review, incorporate, and respond to public comments.	09/25/2014	11/01/2014	Transition Plan, Public Comment (in person, via email, telephonic, and fax/mail), DHHS Website, Direct Mailing to Waiver Participants, CMS Toolkit, Transition Plan Consultant	DHHS MLTC and DDD Staff	All public comments are considered, responses thereto are prepared and distributed with the finalized plan; if DHHS deems necessary, the transition plan may be modified due to public comment.

HCBS Transition Plan Matrix - Comprehensive

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_All Waivers	Outreach	Plan Creation and Implementation	Finalize transition plan for submission to CMS, either comprehensively or separately by specific waiver.	10/15/2014	11/15/2014	Transition Plan, Public Comment (in person, via email, telephonic, and fax/mail), DHHS Website, Direct Mailing to Waiver Participants, CMS Toolkit, Transition Plan Consultant	DHHS MLTC and DDD Staff	Submit for CMS approval a comprehensive transition plan to include a summary of and response to public comments.
Aged and Disabled Waiver and Traumatic Brain Injury Waiver	_Identification	Community Integration - Non-Residential Services	Identify regulation changes necessary to ensure non-residential services compliance with new CMS HCBS rules	08/01/2014	02/28/2015	Waivers: NE HCBS for Aged & Adults & Children w/ Disabilities; NE TBI; Nebraska Administrative Code Title 480 Home and Community Based Waiver Services and Optional TCM Services; Nebraska Administrative Code Title 471 Medicaid Rules; and CMS Tool Box	DHHS Staff, Consultant with stakeholder input and feedback	Regulations comply with the new CMS HCBS rules related to non-residential settings
Aged and Disabled Waiver and Traumatic Brain Injury Waiver	_Identification	Community Integration - Non-Residential Services	Draft policy and procedural changes necessary to ensure non-residential services compliance with new CMS HCBS rules	08/01/2014	02/28/2015	DHHS MLTC Policy Directives	Contracted Services Coordination and DHHS Services Coordination Staff, Waiver Team	Planning and monitoring policies align w/ rule; there is a schedule for implementation
Aged and Disabled Waiver and Traumatic Brain Injury Waiver	_Identification	Community Integration - Non-Residential Services	Identify non-residential services settings that that are "likely not" community. See attached Aged and Disabled Waiver and Traumatic Brain Injury Waivers Addendum.	08/01/2014	02/28/2015	Assessment and site reviews, Participant Experience Surveys, Specialized/targeted experience surveys, provider forums, self advocate family and stakeholder forums	DHHS Staff, Consultant with stakeholder input and feedback	Justification for "not likely" community non-residential settings that meet heightened scrutiny requirements

HCBS Transition Plan Matrix - Comprehensive

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Aged and Disabled Waiver and Traumatic Brain Injury Waiver	_Identification	Community Integration - Non-Residential Services	Draft regulation changes necessary to ensure residential services compliance with new CMS HCBS rules related to community like residential settings	08/01/2014	02/28/2015	Waivers: NE HCBS for Aged & Adults & Children w/ Disabilities; NE TBI; Nebraska Administrative Code Title 480 Home and Community Based Waiver Services and Optional TCM Services; Nebraska Administrative Code Title 471 Medicaid Rules; and CMS Tool Box	DHHS Staff, Consultant with stakeholder input and feedback	Necessary changes to Nebraska Administrative Code are identified
Aged and Disabled Waiver and Traumatic Brain Injury Waiver	_Identification	Community Integration - Non-Residential Services	Identify policy and procedural changes necessary to ensure non-residential services compliance with new CMS HCBS rules related to community like settings	12/01/2014	02/28/2015	DHHS MLTC Policy Directives	Quality Improvement Team	Planning and monitoring policies that must be added or changed to meet the requirements of the new CMS HCBS rules for non-residential settings are identified
Aged and Disabled Waiver and Traumatic Brain Injury Waiver	_Identification	Community Integration - Residential	Identify residential services settings that that are "likely not" community. See attached Aged and Disabled Waiver and Traumatic Brain Injury Waivers Addendum.	12/01/2014	02/28/2015	Listing of all residential settings that meet at least one of the "not likely" community criteria	Contracted Services Coordination and DHHS Services Coordination staff, Waiver Team	There is a list of residential locations that are "not likely" community
Aged and Disabled Waiver and Traumatic Brain Injury Waiver	_Identification	Community Integration - Residential	Review administrative code and waivers to identify requirements and language that don't comport with all other requirements of the new CMS HCBS rules	08/01/2014	02/28/2015	Waivers: NE HCBS for Aged & Adults & Children w/ Disabilities; NE TBI; Nebraska Administrative Code Title 480 Home and Community Based Waiver Services and Optional TCM Services; Nebraska Administrative Code Title 471 Medicaid Rules; and CMS Tool Box	DHHS Staff, Consultant	Necessary changes to Nebraska Administrative Code, waiver language, policy and procedures are identified to ensure compliance with lease requirements and roommate choice provisions of the new CMS HCBS rules

HCBS Transition Plan Matrix - Comprehensive

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Aged and Disabled Waiver and Traumatic Brain Injury Waiver	_Identification	General or Other Requirements	Draft policy and procedures to identify changes needed to comport with the requirements/intent of the new CMS HCBS rules	12/01/2014	02/28/2015	DHHS MLTC Policy Directives	Contracted Services Coordination and DHHS Services Coordination staff, Waiver Team	Planning and monitoring policies that must be added or changed to meet the requirements of the new CMS HCBS rules are identified
Aged and Disabled Waiver and Traumatic Brain Injury Waiver	_Identification	General or Other Requirements	Review processes and forms to identify changes needed to comport with the requirements/intent of the new CMS HCBS rules	12/01/2014	02/28/2015	Needs Assessment (child and adult) & file review monitoring tool	Waiver Team w/ stakeholders advisory council	Needs assessment and planning procedures that must be added or changed are identified
Aged and Disabled Waiver and Traumatic Brain Injury Waiver	_Identification	Performance Metrics	Identify data sources that demonstrate the current level of compliance with new CMS rules	01/01/2014	11/30/2014	Participant Experience Survey, Quality Improvement Data	Quality Improvement Team, Quality Council	Valid and reliable data produce a performance metric that demonstrates compliance with new CMS rule requirements
Aged and Disabled Waiver and Traumatic Brain Injury Waiver	_Identification	Performance Metrics	Identify data sources that demonstrate the level of compliance with elements of the transition plan	04/01/2014	11/30/2014	Participant Experience Survey, Quality Improvement Data	Quality Improvement Team	Valid and reliable data produce a performance metric to demonstrate the degree of compliance with this expectation
Aged and Disabled Waiver and Traumatic Brain Injury Waiver	Analysis	Community Integration - Residential	Distinguish "likely not" community settings that meet requirements of heightened scrutiny from those that don't. See attached Aged and Disabled Waiver and Traumatic Brain Injury Waivers Addendum.	11/01/2014	03/31/2015	Assessment and site reviews, Participant Experience Surveys, Specialized/targeted experience surveys, provider forums, self advocate family and stakeholder forums	DHHS MLTC Staff, Consultant with stakeholder input and feedback	Justification for "not likely" community residential settings that meet heightened scrutiny requirements
Aged and Disabled Waiver and Traumatic Brain Injury Waiver	Analysis	Community Integration - Residential	Develop remediation options for "likely not" community residential settings that do not meet requirements of heightened scrutiny	11/01/2014	03/31/2015	Assessment and site reviews, Participant Experience Surveys, Specialized/targeted experience surveys, provider forums, self advocate family and stakeholder forums	DHHS MLTC Staff, Consultant with stakeholder input and feedback	A plan to bring "not likely" residential services settings into compliance

HCBS Transition Plan Matrix - Comprehensive

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Aged and Disabled Waiver and Traumatic Brain Injury Waiver	Analysis	Community Integration - Residential	Draft proposed policy regulation changes necessary to ensure compliance with new CMS HCBS Rules related to residential settings	04/01/2014	10/31/2014	Waivers: NE HCBS for Aged & Adults & Children w/ Disabilities; NE TBI; Nebraska Administrative Code Title 480 Home and Community Based Waiver Services and Optional TCM Services; Nebraska Administrative Code Title 471 Medicaid Rules; and CMS Tool Box	DHHS MLTC Staff, Consultant with stakeholder input and feedback	Regulations comply with the new CMS HCBS rules related to residential settings
Aged and Disabled Waiver and Traumatic Brain Injury Waiver	Analysis	Community Integration - Residential	Draft policy and procedural changes necessary to ensure compliance with new CMS HCBS rules related to residential settings	12/01/2014	02/28/2015	DHHS MLTC Policy Directives	Quality Improvement Team	Policy and procedures comply with the new CMS HCBS rules related to residential settings
Aged and Disabled Waiver and Traumatic Brain Injury Waiver	Analysis	Community Integration - Residential	Create a lease template that can be used by waiver participants living in provider owned or controlled residential settings and meets the requirements of the new CMS HCBS rules	02/01/2015	05/31/2015	CMS Tool box	DHHS staff and consultant, Provider associations	DHHS has a lease template that can be used to ensure waiver participants are afforded the same tenant rights extended to all NE citizens
Aged and Disabled Waiver and Traumatic Brain Injury Waiver	Analysis	Community Integration - Residential	Draft rules that require provider owned or controlled residences to ensure residents rights are protected by a lease or comparable legally binding agreement	08/01/2014	02/28/2015	CMS Tool box, resources from other states and national organizations	Health Care Association - lease, Waiver Team	DHHS has rules that ensure waiver participants living in provider owned and controlled settings are afforded the same tenant rights extended to all NE citizens
Aged and Disabled Waiver and Traumatic Brain Injury Waiver	Analysis	General or Other Requirements	Draft DHHS Policy and procedural revisions necessary to comply with all other requirements of the new CMS HCBS rules and create an implementation plan	12/01/2014	02/28/2015	DHHS MLTC Policy Directives	Contracted Services Coordination and DHHS Services Coordination Staff, Waiver Team	Planning and monitoring policies align w/ rule; there is a schedule for implementation

HCBS Transition Plan Matrix - Comprehensive

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Aged and Disabled Waiver and Traumatic Brain Injury Waiver	Analysis	General or Other Requirements	Draft DHHS process and forms revisions and create an implementation plan	01/01/2015	03/31/2015	Needs Assessment (child and adult) & file review monitoring tool	Waiver Team w/ stakeholders advisory council	Needs assessment and planning procedures align w/ rule requirements, including team composition; there is a schedule for implementation
Aged and Disabled Waiver and Traumatic Brain Injury Waiver	Analysis	Performance Metrics	Analyze performance metrics used to assess the current level of compliance with new CMS Rules	08/01/2014	ongoing	Participant Experience Surveys, Quality Improvement Data	Quality Improvement Team, Quality Council	Performance metrics will demonstrate the level of existing system compliance with new HCBS rules
Aged and Disabled Waiver and Traumatic Brain Injury Waiver	Analysis	Performance Metrics	Define performance metrics used to assess compliance with the elements of the transition plan	10/01/2014	01/31/2015	Participant Experience Surveys, Quality Improvement Data	Quality Improvement Team, Quality Council	Performance metrics will demonstrate the level of compliance with the expectations contained within the transition plan
Aged and Disabled Waiver and Traumatic Brain Injury Waiver	Outreach	General or Other Requirements	Identify and implement effective strategies for involving stakeholders in the assessment and remediation of "not likely" community residential settings	08/01/2014	ongoing	Public meetings, ad hoc committees, provider meetings,	DHHS Staff, Consultant	Stakeholders including self advocates and their families and friends will guide, inform and oversee "not like" community residential changes
Aged and Disabled Waiver and Traumatic Brain Injury Waiver	Outreach	General or Other Requirements	Educate providers	01/01/2014	ongoing	Rules, Tool box material, provider meetings	Providers, DHHS Staff, Advocacy Grups	Inform providers and public
Aged and Disabled Waiver and Traumatic Brain Injury Waiver	Outreach	General or Other Requirements	Educate waiver participants, guardians, and family on the requirements of the new CMS HCBS rules and the changes they can expect to see as a result of implementation	07/01/2014	ongoing	Comprehensive transition plan, MLTC website	DHHS Staff, Consultant	Wavier participants understand the requirements of the new CMS HCBS rules and what they can expect / how their services will be impacted

HCBS Transition Plan Matrix - Comprehensive

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Aged and Disabled Waiver and Traumatic Brain Injury Waiver	Remediation	Community Integration - Residential	Promulgate Nebraska Administrative Code changes to residential services requirements that align with new CMS HCBS rules related to community like non-residential services settings. Includes public hearing on regulations in accordance with the Administrative Procedures Act.	04/01/2015	01/31/2016	Waivers: NE HCBS for Aged & Adults & Children w/ Disabilities; NE TBI; Nebraska Administrative Code Title 480 Home and Community Based Waiver Services and Optional TCM Services; Nebraska Administrative Code Title 471 Medicaid Rules; and CMS Tool Box	DHHS DDD and MLTC Staff, Consultant with stakeholder input and feedback	NAC will contain authority necessary for DDD to ensure compliance with new CMS HCBS rules related to community like day services settings
Aged and Disabled Waiver and Traumatic Brain Injury Waiver	Remediation	Community Integration - Residential	De-certify residential services settings that are unable to meet requirements mandated by the new CMS HCBS rules	01/31/2016	ongoing	Site reviews and survey	Quality Improvement, Resource Development staff	Residential services settings that don't meet requirements mandated by the new CMS HCBS rules will not receive HCBS funding
Aged and Disabled Waiver and Traumatic Brain Injury Waiver	Remediation	Community Integration - Residential	Monitor residential services settings to ensure compliance with requirements mandated by the new CMS HCBS rules	01/31/2016	ongoing	Site reviews and survey, Participant Experience Surveys	Quality Improvement, Resource Development staff.	HCBS residential services maximize opportunities to access the community and receive services in the most integrated setting
Aged and Disabled Waiver and Traumatic Brain Injury Waiver	Remediation	General or Other Requirements	Train Service Coordination and Resource Development staff	03/01/2015	ongoing	DHHS Policy Directives Needs Assessment (child and adult) & file review monitoring tool	Contracted Services Coordination and DHHS Services Coordination staff, Waiver Team	Service coordinators have the skills and tools to facilitate planning that reflects individual needs and preferences and conduct plan monitoring to ensure individual rights, optimize independence, facilitate choice and maximize opportunities to access community and receive services in the most integrated setting. Resource developers recognize and monitor HCBS qualities in service settings.

HCBS Transition Plan Matrix - Comprehensive

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Aged and Disabled Waiver and Traumatic Brain Injury Waiver	Remediation	General or Other Requirements	Monitor Services Coordination activities	03/01/2015	ongoing	DHHS Policy Directives Needs Assessment (child and adult) & file review monitoring tool	Contracted Services Coordination and DHHS Services Coordination staff, Waiver Team	Service planning and monitoring policies reflect individual needs and preferences and ensure individual rights, optimize independence, facilitate choice and maximize opportunities to access community and receive services in the most integrated setting
Aged and Disabled Waiver and Traumatic Brain Injury Waiver	Remediation	General or Other Requirements	Monitor implementation of and compliance with new rules requiring a lease agreement	01/31/2016	ongoing	Resource Development activities, Quality Improvement data	Quality Improvement Team	Waiver participants living in provider owned and controlled settings are afforded the same tenant rights extended to all NE citizens and choice of roommates when sharing a bedroom
Aged and Disabled Waiver and Traumatic Brain Injury Waiver	Remediation	Performance Metrics	Analyze performance metrics to make adjustments to the transition plan	06/01/2016	ongoing	Participant Experience Surveys, Quality Improvement Data	Quality Improvement Team	The transition plan will be adapted/enhanced to ensure compliance with the new CMS HCBS rules
DD Waivers	_Identification	Community Integration - Day Services	Identify regulation changes necessary to ensure day services compliance with new CMS HCBS rules.	06/01/2014	12/31/2014	Nebraska Administrative Code, Title 404, CMS Toolkit and Guidance, Stakeholder Meetings	Deputy Director of CBS, Technical Assistance Team, Community Liaison	Necessary changes to regulations are identified to comply with new CMS rules regarding day services
DD Waivers	_Identification	Community Integration - Day Services	Identify internal Division guideline revisions necessary to ensure day services compliance with new CMS HCBS rules.	06/01/2014	12/31/2014	DDD Guidelines and Related QI and Service Coordination Forms and Tools	Deputy Director of CBS, Service Coordination Team Administrator, QI Administrator, Technical Assistance Manager	Necessary changes to internal Division guidelines are identified to comply with new CMS rules regarding day services
DD Waivers	_Identification	Community Integration - Day Services	Identify day services settings that are "likely not" community.	10/01/2014	12/31/2014	Provider Listings, Provider Site Reviews and Compliance Surveys, Participant Experience Surveys, Self-Advocate/Family Surveys, Service Coordination Monitoring Tools, Provider Self-Assessments, Stakeholder Meetings	QI Team, Technical Assistance Team, Community Liaison, Service Coordination Leadership Team	There is a list of day service locations that may be considered "not likely" community.

HCBS Transition Plan Matrix - Comprehensive

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DD Waivers	_Identification	Community Integration - Day Services	Create Provider Self-Assessment Tool and revise existing Self-Advocate/Family Surveys to provide information regarding the community nature of day settings.	08/15/2014	09/30/2014	Prior Self-Advocate/Family Surveys, Samples from Other States, CMS Toolkit, Transition Plan Consultant	Community Liaison, Technical Assistance Manager, DD Contract Manager	A Provider Self-Assessment Tool is created and the DD Community-Based Services Self-Advocate/Family Survey is updated to provide information regarding the community nature of day settings.
DD Waivers	_Identification	Community Integration - Residential	Identify regulation changes necessary to ensure residential services compliance with new CMS HCBS rules.	06/01/2014	12/31/2014	Nebraska Administrative Code, Title 404, CMS Toolkit and Guidance, Stakeholder Meetings	Deputy Director of CBS, Technical Assistance Team, Community Liaison	Necessary changes to regulations are identified to comply with new CMS rules regarding residential services.
DD Waivers	_Identification	Community Integration - Residential	Identify internal Division guideline revisions necessary to ensure residential services compliance with new CMS HCBS rules.	06/01/2014	12/31/2014	DDD Guidelines and Related QI and Service Coordination Forms and Tools, Transition Plan Consultant	Deputy Director of CBS, Service Coordination Team Administrator, QI Administrator, Technical Assistance Manager	Necessary changes to internal Division guidelines are identified to comply with new CMS rules regarding residential services.
DD Waivers	_Identification	Community Integration - Residential	Identify residential services settings that that are "likely not" community	10/01/2014	12/31/2014	Provider Listings, Provider Site Reviews and Compliance Surveys, Participant Experience Surveys, Self-Advocate/Family Surveys, Service Coordination Monitoring Tools, Provider Self-Assessments, Stakeholder Meetings, Transition Plan Consultant	QI Team, Technical Assistance Team, Community Liaison, Service Coordination Leadership Team	There is a list of residential locations that may be considered "not likely" community.

HCBS Transition Plan Matrix - Comprehensive

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DD Waivers	_Identification	Community Integration - Residential	Create Provider Self-Assessment Tool and revise existing Self-Advocate/Family Surveys to provide information regarding the community nature of residential settings.	08/15/2014	09/30/2014	Prior Self-Advocate/Family Surveys, Samples from Other States, CMS Toolkit, ARC of Nebraska, Developmental Disabilities Council, Developmental Disabilities Advisory Committee, Nebraska Association of Service Providers, and Transition Plan Consultant	Community Liaison, Technical Assistance Manager, DD Contract Manager	A Provider Self-Assessment Tool is created and the DD Community-Based Services Self-Advocate/Family Survey is updated to provide information regarding the community nature of residential settings.
DD Waivers	_Identification	General or Other Requirements	Review regulations, internal guidelines, and HCBS waivers to identify requirements and language that don't comport with all other requirements of the new CMS HCBS rules that are not already identified herein.	07/10/2014	12/31/2014	Nebraska Administrative Code, Title 404, DDD Operational Guidelines, Nebraska's DD HCBS Waivers, CMS Toolkit and Guidance, Stakeholder Meetings and Transition Plan Consultant	Deputy Director of CBS, Service Coordination Team Administrator, QI Administrator, Technical Assistance Manager, Community Liaison	Necessary changes to NAC, waiver language, policy and procedures are identified to ensure compliance with lease requirements and roommate choice provisions of the new CMS HCBS rules
DD Waivers	_Identification	General or Other Requirements	Identify data sources and performance metrics that relate to and/or demonstrate the current level of compliance with new CMS rules	07/10/2014	12/31/2015	Provider Site Reviews and Compliance Surveys, Participant Experience Surveys, Self-Advocate/Family Surveys, Service Coordination Monitoring Tools, Quality Review Team Surveys, Quality Improvement Indicators/Data, CMS Toolkit, Stakeholder Meetings, Transition Plan Consultant	QI Team, Community Liaison, Service Coordination Leadership Team, Quality Review Teams	Valid and reliable data produce a performance metric that demonstrates compliance with new CMS rule requirements
DD Waivers	_Identification	General or Other Requirements	Identify data sources that will be used to measure transition plan activities compliance with new CMS rules	10/01/2014	ongoing	HCBS Compliance Plan Matrix (and all related data sources referenced therein), Transition Plan Consultant	Deputy Director of CBS, Service Coordination Team Administrator, QI Administrator	Valid and reliable data produce a performance metric that can be used to assess the success of transition plan actions in meeting the expectations of the new CMS rule requirements

HCBS Transition Plan Matrix - Comprehensive

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DD Waivers	Analysis	Community Integration - Day Services	Distinguish "likely not" community day services settings that meet requirements of heightened scrutiny from those that do not.	01/01/2015	12/31/2015	Provider Site Reviews and Compliance Surveys, Participant Experience Surveys, Self-Advocate/Family Surveys, Service Coordination Monitoring Tools, Provider Self-Assessments, Stakeholder Meetings	QI Team, Technical Assistance Team, Community Liaison, Service Coordination Leadership Team	For community day services, the Division knows which services are fully compliant, which ones are not fully compliant but meet the heightened scrutiny requirements, and is aware of the location and characteristics of settings that are not compliant and do not meet the heightened scrutiny requirements. By fully analyzing the characteristics of the various settings, the Division is better equipped to consider options to obtain full compliance.
DD Waivers	Analysis	Community Integration - Day Services	Consider remediation options for "likely not" community day settings that do not meet requirements of heightened scrutiny.	01/01/2015	12/31/2015	Provider Self-Assessments, Stakeholder Meetings (led by Consultant, to include providers, self advocates/families, service coordinators and advocacy entities)	Deputy Director of CBS, Technical Assistance Team, Community Liaison, QI Team	The Division has a plan with an array of options to bring "not likely" day services settings into compliance that identifies the resources necessary and targeted timeframes for each element of the plan. For any settings that are not capable of coming into compliance, the Division has a plan to transition individuals to alternative services settings.
DD Waivers	Analysis	Community Integration - Day Services	Draft regulation changes necessary to ensure compliance with new CMS HCBS Rules related to day settings.	01/01/2015	03/31/2016	Nebraska Administrative Code, Title 404 and Stakeholder Meetings	Deputy Director of CBS, Technical Assistance Team, Community Liaison	Regulations comply with the new CMS HCBS rules related to day settings and support DDD activities to ensure compliance
DD Waivers	Analysis	Community Integration - Day Services	Draft internal Division guideline revisions necessary to ensure compliance with new CMS HCBS rules related to day settings	01/01/2015	03/31/2016	DDD Guidelines and Related QI and Service Coordination Forms and Tools	Deputy Director of CBS, Service Coordination Team Administrator, QI Administrator, Technical Assistance Manager	DDD internal staff guidelines comply with the new CMS HCBS rules related to day settings and support QI Team and Service Coordination Team activities to ensure compliance.
DD Waivers	Analysis	Community Integration - Day Services	Review and revise day service definitions to remove reference to facilities-based settings and clarify the Division's mission of serving all individuals in the most integrated setting possible.	06/01/2014	10/01/2014	Developmental Disabilities HCBS Waivers, Stakeholder Meetings	Deputy Director of CBS, DD Waiver Administrator	DD HCBS Waivers reflect language that describes the Division's mission to serve all individuals in the most integrated setting possible.

HCBS Transition Plan Matrix - Comprehensive

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DD Waivers	Analysis	Community Integration - Day Services	Review and revise retirement services definition, requirements and restrictions.	11/01/2014	12/31/2015	Developmental Disabilities HCBS Waivers, Stakeholder Meetings	Deputy Director of CBS, DD Waiver Administrator	Retirement services are clearly defined to include requirements and restrictions.
DD Waivers	Analysis	Community Integration - Residential	Distinguish "likely not" community residential settings that meet requirements of heightened scrutiny from those that do not. (For community residential services, the Division has already defined in regulation settings that are "likely not" community residential settings.)	01/01/2015	12/31/2015	Provider Site Reviews and Compliance Surveys, Participant Experience Surveys, Self-Advocate/Family Surveys, Service Coordination Monitoring Tools, Provider Self-Assessments, Stakeholder Meetings	QI Team, Technical Assistance Team, Community Liaison, Service Coordination Leadership Team	By fully analyzing the characteristics of the various settings, the Division is better equipped to consider options to obtain full compliance.
DD Waivers	Analysis	Community Integration - Residential	Consider remediation options for "likely not" community residential settings that do not meet requirements of heightened scrutiny.	01/01/2015	12/31/2015	Provider Self-Assessments, Stakeholder Meetings (led by Consultant, to include providers, self advocates/families, service coordinators and advocacy entities)	Deputy Director of CBS, Technical Assistance Team, Community Liaison, QI Team	The Division has a plan with an array of options to bring "not likely" residential services settings into compliance that identifies the resources necessary and targeted timeframes for each element of the plan. For any settings that are not capable of coming into compliance, the Division has a plan to transition individuals to alternative service settings.
DD Waivers	Analysis	Community Integration - Residential	Review regulation changes necessary to ensure compliance with new CMS HCBS Rules related to residential settings. While the Division has already defined in regulation settings that are "likely not" community residential settings, current regulations allow for an exception to that definition without any confirmation that the settings meet particular criteria ensuring community characteristics.	01/01/2015	03/31/2016	Nebraska Administrative Code, Title 404 and Stakeholder Meetings	Deputy Director of CBS, Technical Assistance Team, Community Liaison	Regulations comply with the new CMS HCBS rules related to residential settings and support DDD activities to ensure compliance

HCBS Transition Plan Matrix - Comprehensive

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DD Waivers	Analysis	Community Integration - Residential	Draft internal Division guideline revisions necessary to ensure compliance with new CMS HCBS rules related to residential settings.	01/01/2015	03/31/2016	DDD Guidelines and Related QI and Service Coordination Forms and Tools	Deputy Director of CBS, Service Coordination Team Administrator, QI Administrator, Technical Assistance Manager	DDD internal staff guidelines comply with the new CMS HCBS rules related to residential settings and support QI Team and Service Coordination Team activities to ensure compliance.
DD Waivers	Analysis	General or Other Requirements	Analyze other regulations and internal guidelines not specifically addressed in HCBS Transition Plan to determine whether additional revisions and/or enhancements are needed to ensure compliance with HCBS rule. If revisions are warranted, a plan for implementation is to be created.	11/01/2014	06/30/2015	Nebraska Administrative Code, Title 404, DDD Guidelines, CMS Toolkit and Stakeholder Meetings	Deputy Director of CBS, QI Team, Technical Assistance Team, Community Liaison, Service Coordination Leadership Team	Division regulations and guidance have been fully reviewed and revised to ensure requirements with all new HCBS rules.
DD Waivers	Analysis	General or Other Requirements	Analyze performance metrics used to assess the current level of compliance with new CMS Rules; revise where necessary to address new requirements.	10/01/2014	Ongoing	Provider Site Reviews and Compliance Surveys, Participant Experience Surveys, Self-Advocate/Family Surveys, Service Coordination Monitoring Tools, Quality Review Team Surveys, Quality Improvement Indicators/Data	QI Team, Community Liaison, Service Coordination Leadership Team, Quality Review Teams	Performance metrics will demonstrate the level of existing system compliance with new HCBS rules and identify areas where enhanced effort is needed to ensure individuals are being supported in the most integrated way possible.
DD Waivers	Analysis	General or Other Requirements	Analyze performance metrics and revise where necessary to ensure compliance with all elements of the transition plan (including any new elements that are identified in the Identification and Analysis activities described herein.)	10/01/2014	05/31/2016	HCBS Compliance Plan Matrix (and all related data sources referenced therein), Transition Plan Consultant	Deputy Director of CBS, Service Coordination Team Administrator, QI Administrator	Performance metrics will demonstrate the level of compliance with the expectations contained within the transition plan.

HCBS Transition Plan Matrix - Comprehensive

Applicable Waivers	Task	Regulatory Compliance Area	Action Item	Anticipated Start Date	Targeted Completion Date	Nebraska Health and Human Services Resources	Nebraska Health and Human Services Stakeholders	Expected Outcome
DD Waivers	Analysis	Individual Rights	Coordinate with Stakeholders to design a lease template that can be used by waiver participants living in provider owned or controlled residential settings that meets the requirements of the new CMS HCBS rules	01/01/2014	12/31/2014	Nebraska Association of Specialized Providers Workgroup, CMS Tool box, State and Federal Housing Agencies	Technical Assistance Team, Contract Manager	DHHS has a lease template that can be used to ensure waiver participants are afforded the same tenant rights extended to all Nebraska citizens.
DD Waivers	Analysis	Individual Rights	Promulgate rules that require provider owned or controlled residences to ensure resident's rights are protected by a lease or comparable legally binding agreement.	11/01/2014	03/31/2016	Nebraska Administrative Code, Title 404 and Stakeholder Meetings	Deputy Director of CBS, Technical Assistance Team, Community Liaison	DDD has rules that ensure waiver participants living in provider owned and controlled settings are afforded the same tenant rights extended to all NE citizens
DD Waivers	Analysis	Individual Rights	Promulgate rules that require provider owned or controlled residences to offer choice of roommates to people sharing bedrooms.	11/01/2014	03/31/2016	Nebraska Administrative Code, Title 404 and Stakeholder Meetings	Deputy Director of CBS, Technical Assistance Team, Community Liaison	DDD has rules that ensure waiver participants living in provider owned and controlled settings are afforded choice or roommate when sharing a bedroom
DD Waivers	Analysis	Individual Rights	Enhance survey tools and process to more rigorously review human and legal rights processes.	10/01/2014	05/31/2016	Service Coordination Monitoring Tools, Provider Site Reviews and Compliance Surveys	QI Team, Service Coordination Leadership Team	DDD regulations ensuring that individual's rights are not improperly restricted are diligently enforced.
DD Waivers	Outreach	Community Integration - Day Services	Identify and implement effective strategies for involving stakeholders in the analysis and remediation of "not likely" community day services settings	06/01/2014	Ongoing	Public Meetings, Specialized Provider Workgroup/Meetings, Coordination with the ARC of Nebraska, People First of Nebraska, the Developmental Disabilities Council, and the Developmental Disability Advisory Committee, Nebraska Association of Service Providers, and Transition Plan Consultant	Deputy Director of Community Based Services, Community Liaison, Technical Assistance Manager	Stakeholders including self advocates and their families and friends, providers, and self-advocacy entities will guide and inform the "not like" community day services changes.

HCBS Transition Plan Matrix - Comprehensive

Applicable Waivers	Task	Regulatory Compliance Area	Action Item	Anticipated Start Date	Targeted Completion Date	Nebraska Health and Human Services Resources	Nebraska Health and Human Services Stakeholders	Expected Outcome
DD Waivers	Outreach	Community Integration - Residential	Identify and implement effective strategies for involving stakeholders in the assessment and remediation of "not likely" community residential settings	06/01/2014	Ongoing	Public Meetings, Specialized Provider Workgroup/Meetings, Coordination with the ARC of Nebraska, People First of Nebraska, the Developmental Disabilities Council, and the Developmental Disability Advisory Committee, Nebraska Association of Service Providers, and Transition Plan Consultant	Deputy Director of Community Based Services, Community Liaison, Technical Assistance Manager	Stakeholders including self advocates and their families and friends, providers, and self-advocacy entities will guide and inform the "not like" community residential changes.
DD Waivers	Outreach	General or Other Requirements	Share information with individual and their families/guardians, service providers, and advocacy entities on the requirements of the new CMS HCBS rules and the changes they can expect to see as a result of implementation.	07/01/2014	Ongoing	Transition Plan, DHHS Website, Direct Mailing to Individuals In Services, Articles in the Sower Newsletter, Public/Stakeholder Meetings	DD Director, Deputy Director of Community Based Services, Waiver Administrator, Operations Administrator, QI Administrator, Technical Assistance Manager, Community Liaison	All stakeholders understand the requirements of the new CMS HCBS rules, what they can expect, and how their services will be impacted.
DD Waivers	Remediation	Community Integration - Day Services	Provide education, technical assistance and enforcement of regulatory changes to day services requirements that align with new CMS HCBS rules related to day services settings. This includes enforcement of progressive discipline to include financial penalties and failure to renew certification for specialized providers.	01/01/2017	Ongoing	Nebraska Administrative Code, Title 404, Provider Site Reviews and Compliance Surveys, Provider Training and Technical Assistance, Service Coordination Monitoring Tools, Service Coordination Individual/Family Meetings	Deputy Director of Community Based Services, QI Team, Technical Assistance Team, Service Coordination Team, Community Liaison	The Division will exercise its authority to ensure compliance with new CMS HCBS rules related to community like day services settings

HCBS Transition Plan Matrix - Comprehensive

Applicable Waivers	Task	Regulatory Compliance Area	Action Item	Anticipated Start Date	Targeted Completion Date	Nebraska Health and Human Services Resources	Nebraska Health and Human Services Stakeholders	Expected Outcome
DD Waivers	Remediation	Community Integration - Day Services	Seek and secure resources to support innovation necessary to bring "not likely" community day services settings into compliance with new CMS HCBS rules. This includes evaluation of rate methodology to account for increased provider staffing requirements to support individuals in a more integrated setting.	01/01/2016	Ongoing	2017-18 Biennial Budget Request to Nebraska Legislature, Developmental Disability Council Grants, and other State/Federal Grants or Funds	DD Director, Deputy Director of Community Based Services, Technical Assistance Manager, DD Fiscal Analyst	"Not likely" community day services settings that don't meet the requirements under heightened scrutiny have accessed resources and implemented changes necessary to be compliant with the new CMS HCBS rules
DD Waivers	Remediation	Community Integration - Day Services	Reach out to integrated providers of retirement services to increase options available to retirees in developmental disability services. While this may affect both day and residential services, efforts are targeted towards day services as that is where the Division recognizes the greatest risks.	01/01/2015	Ongoing	Aged and Disabled Programs, Leagues of Human Dignity, State and Local Chambers of Commerce, State and Local Organizations Targeted at Retirees, Stakeholders, Advocacy Entities	Technical Assistance Team, Community Liaison, QI Manager, Contract Manager	An array of service provider are available to support individuals with developmental disabilities throughout Nebraska to avoid unnecessary institutionalization or other services that may exclude individuals from integrated community enjoyment.
DD Waivers	Remediation	Community Integration - Residential	Provide education, technical assistance and enforcement of regulatory changes to day services requirements that align with new CMS HCBS rules related to residential services settings. This includes enforcement of progressive discipline to include financial penalties and failure to renew certification for specialized providers.	01/01/2017	Ongoing	Nebraska Administrative Code, Title 404, Provider Site Reviews and Compliance Surveys, Provider Training and Technical Assistance, Service Coordination Monitoring Tools, Service Coordination Individual/Family Meetings	Deputy Director of Community Based Services, QI Team, Technical Assistance Team, Service Coordination Team, Community Liaison	The Division will exercise its authority to ensure compliance with new CMS HCBS rules related to community like residential services settings

HCBS Transition Plan Matrix - Comprehensive

Applicable Waivers	Task	Regulatory Compliance Area	Action Item	Anticipated Start Date	Targeted Completion Date	Nebraska Health and Human Services Resources	Nebraska Health and Human Services Stakeholders	Expected Outcome
DD Waivers	Remediation	Community Integration - Residential	Seek and secure resources to support innovation necessary to bring "not likely" community residential services settings into compliance with new CMS HCBS rules. This includes evaluation of rate methodology to account for increased provider staffing requirements to support individuals in a more integrated setting.	01/01/2016	Ongoing	2017-18 Biennial Budget Request to Nebraska Legislature, Developmental Disability Council Grants, and other State/Federal Grants or Funds	DD Director, Deputy Director of Community Based Services, Technical Assistance Manager, DD Fiscal Analyst	"Not likely" community residential services settings that don't meet the requirements under heighten scrutiny have accessed resources and implemented changes necessary to be compliant with the new CMS HCBS rules
DD Waivers	Remediation	General or Other Requirements	Routinely re-evaluate monitoring tools and processes for all services settings to ensure continued compliance with requirements mandated by the new CMS HCBS rules. This includes site characteristic issues, individual rights, and all other aspects relevant thereto.	07/01/2017	Ongoing	Provider Site Reviews and Compliance Surveys, Participant Experience Surveys, Self-Advocate/Family Surveys, Service Coordination Monitoring Tools, Provider Self-Assessments, Stakeholder Meetings	QI Team, Technical Assistance Team, Community Liaison, Service Coordination Leadership Team	HCB services support access to the greater community, offers opportunities for employment, optimizes independence, facilitates choice and ensures individual rights are protected.

HCBS Transition Plan Matrix - Comprehensive

Applicable Waivers	Task	Regulatory Compliance Area	Action Item	Anticipated Start Date	Targeted Completion Date	Nebraska Health and Human Services Resources	Nebraska Health and Human Services Stakeholders	Expected Outcome
DD Waivers	Remediation	General or Other Requirements	Routinely review and revise Service Coordination hiring tools, orientation, training curriculum, monitoring tools and other supports to ensure a continued focus on person centered practices, recognition of and advocacy for individual rights, and ensuring that all individuals are supported in the most integrated settings possible.	03/01/2015	Ongoing	Service Coordination Hiring Tools and Orientation Curriculum, Service Coordination Training Curriculum, Service Coordination Monitoring Tools, Service Coordination Recognition Programs, Service Coordination Performance Evaluation Tools, Service Coordination Individual/Family Meeting Tools (including Personal Focus Worksheets and other planning tools), Annual State-Wide Service Coordination Training and Tri-Annual Developmental Disability Conferences	Deputy Director of Community Based Services, Service Coordination Leadership Team, Technical Assistance Team	Service coordinators have the skills and tools to facilitate planning that reflects individual needs and preferences and conduct plan monitoring to ensure individual rights, optimize independence, facilitate choice and maximize opportunities to access community and receive services in the most integrated setting
DD Waivers	Remediation	General or Other Requirements	Provide an annual update regarding this Transition Plan in the Division of Developmental Disabilities Update provided to the Nebraska Legislature and available to Stakeholders.	03/15/2014	Ongoing	Annual Division of Developmental Disabilities Update	DD Director, Deputy Director of Community Based Services	The Division is accountable to the Nebraska Legislature and all stakeholders for ensuring compliance with the HCBS rules ensuring that all individuals have access to and are being served in the most integrated setting.
DD Waivers	Remediation	Individual Rights	Provide additional training to individual and their families, service providers and Divison staff in the area of right restrictions/ensuring individual rights are protected.	09/01/2014	Ongoing	Technical Assistance and Service Coordination Training Curriculum, Nebraska Association of Service Provider Meetings, the <i>Sower</i> Newsletter, and Individual/Family Meeting	Technical Assistance Team, Contract Manager, Community Liaison, Service Coordination Team	All stakeholders understand the conditions under which and the requirements that must be met before an individual's rights are restricted; all stakeholders appreciate, recognize and diligently protect the rights of all individuals receiving services.