

### HCBS Transition Plan Matrix - MLTC Managed Waivers by Task

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
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 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
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

### HCBS Transition Plan Matrix - MLTC Managed Waivers by Task

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
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
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

### HCBS Transition Plan Matrix - MLTC Managed Waivers by Task

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
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
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

## HCBS Transition Plan Matrix - MLTC Managed Waivers by Task

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
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
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 compliancw 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

### HCBS Transition Plan Matrix - MLTC Managed Waivers by Task

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 - MLTC Managed Waivers by Task

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	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	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 likely" 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
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 Adminstrative 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

### HCBS Transition Plan Matrix - MLTC Managed Waivers by Task

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
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.
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