

**Missouri Home and Community Based Services (HCBS)  
1915(c) Waiver Settings Statewide Transition Plan**

Missouri administers ten Home and Community Based Waivers through Department of Social Services, MO HealthNet Division (MHD), which is the single State Medicaid agency. The day-to-day operation of the waivers is through formal cooperative agreements with the Missouri Department of Mental Health (DMH) and the Missouri Department of Health and Senior Services (DHSS). The Department of Health and Senior Services and the Department of Mental Health are the operational entities for the waivers.

The formal cooperative agreement outlines specific duties related to the administration, operation and oversight functions of the waiver. The Medicaid Agency has ultimate administrative authority and oversight responsibility for the waivers. All official correspondence including this transition plan, waiver submissions and waiver amendments are developed by, jointly developed, or reviewed by the Medicaid Agency prior to submission to the Centers for Medicare and Medicaid Services. Any changes to a waiver program must be approved by the State Medicaid Agency. Oversight meetings are held quarterly to discuss waiver functions. The CMS Final Rule, including the activities listed in the transition plan, will be discussed quarterly during the oversight meetings. In addition to the quarterly oversight meetings, staff meets when situations arise that warrant discussion between agencies.

The transition plan incorporates all ten DHSS and DMH waivers and has been jointly developed by the Department of Social Services/MO HealthNet Division, the Department of Mental Health and the Department of Health and Senior Services. The transition plan as outlined below will have sections that apply exclusively to waivers operated by DHSS, waivers operated by DMH, or both state agencies, herein referred to as State.

The MO Department of Health and Senior Services operates the following 1915 (c) Waivers (DHSS Waivers):

- Adult Day Care Waiver (MO.1021)
- Aged and Disabled Waiver (MO.0026)
  - All services, except Adult Day Care Services, in the Aged and Disabled Waiver are received and administered in the participant's home. These services are administered without restricting the participant's access to the community. The participants are given choice and are ensured the rights of privacy, dignity, respect and freedom from coercion and restraints. Participants are ensured individual initiative, autonomy, and independence in making life choices, including but not limited to, daily activities, physical environment and with whom to interact.
- AIDS Waiver (MO.0197)
  - Only one setting, Doorways, is under heightened scrutiny. All other participants receive services in their homes. These services are administered without restricting the participant's access to the community. The participants are given choice and are ensured the rights of privacy, dignity, respect and freedom from coercion and restraints. Participants are ensured individual initiative,

autonomy, and independence in making life choices, including but not limited to, daily activities, physical environment and with whom to interact.

- Independent Living Waiver (MO.0346)
  - All services in the Independent Living Waiver are received and administered in the participant's home. These services are administered without restricting the participant's access to the community. The participants are given choice and are ensured the rights of privacy, dignity, respect and freedom from coercion and restraints. Participants are ensured individual initiative, autonomy, and independence in making life choices, including but not limited to, daily activities, physical environment and with whom to interact.
- Medically Fragile Adult Waiver (MO.40190)
  - All services in the Medically Fragile Adult Waiver are received and administered in the participant's home. These services are administered without restricting the participant's access to the community. The participants are given choice and are ensured the rights of privacy, dignity, respect and freedom from coercion and restraints. Participants are ensured individual initiative, autonomy, and independence in making life choices, including but not limited to, daily activities, physical environment and with whom to interact.

The MO Department of Mental Health operates the following 1915 (c) Waivers (DMH Waivers):

- Autism Waiver (MO.0698)
- Comprehensive Waiver (MO.0178)
- Missouri Children with Developmental Disabilities Waiver (MO.4185)
- Partnership for Hope Waiver (MO.0841)
- Support Waiver (MO.0404)

This transition plan incorporates all ten waivers. The transition plan as outlined below will have sections that apply exclusively to DHSS waivers, DMH waivers, or both state agencies (herein referred to as State). All DMH waivers will follow the same action items outlined.

Missouri Medicaid Audit and Compliance (MMAC) Unit will participate in the transition plan as described below.

## **Section 1: Assessment**

Missouri (MO) proposes a multi-faceted approach to assessment. This will include the completion of a Settings Analysis, which will be a high-level assessment of settings within the state to identify general categories (not specific providers or locations) that are likely to be in compliance; not in compliance; presumed to be Non-Home and Community-Based Waiver Services (HCBS Waiver) or those that are not yet, but could become compliant. Other avenues for assessment will include identifying HCBS Waiver settings during provider enrollment and re-enrollment; evaluating settings through the existing HCBS Waiver quality assurance on-site

review process and the provider self-assessment process; and monitoring of survey results for member experiences. Assessment activities will be incorporated into current quality assurance processes to the extent possible.

Action Item	Description	Proposed Start Date	Proposed End Date	Sources/Documents
Initial Settings Provider Self-Assessment Survey	<p>DMH Waivers:</p> <ul style="list-style-type: none"> <li>State incorporated HCBS Waiver setting questions into an initial provider survey. DMH will validate all of the initial DMH provider survey results with individualized provider information and initial on-site assessments.</li> </ul> <p>DHSS Waivers:</p> <ul style="list-style-type: none"> <li>State incorporated HCBS Waiver setting questions into an initial provider survey. Missouri Medicaid Audit and Compliance (MMAC) will validate all of the initial Adult Day Care provider survey results during on-site assessments. A survey was completed by Doorways (AIDS Waiver provider) and there has been ongoing dialog between DHSS and Doorways to come into compliance. No other surveys were completed as all other AIDS Waiver participants live in their own homes. MMAC will also validate the Doorways survey results during on-site assessments.</li> </ul>	06/23/14	09/10/14	<p>State:</p> <ul style="list-style-type: none"> <li>2014 Settings Provider Self-Assessment Survey</li> </ul>
Settings Analysis	<p>State:</p> <ul style="list-style-type: none"> <li>State Identified HCBS Waiver settings as they potentially conform to HCBS characteristics and ability to comply in the future. General settings are classified into the following categories: <ul style="list-style-type: none"> <li>Yes - Settings fully compliant;</li> </ul> </li> </ul>	09/23/14	02/02/15	<p>State:</p> <ul style="list-style-type: none"> <li>Missouri Modified "Template for State Setting Analysis" herein referred to as Missouri HCBS Settings Analysis</li> </ul>

	<ul style="list-style-type: none"> <li>• Not Yet - settings that will comply with changes;</li> <li>• Not Yet - setting is presumed non-HCBS compliant but evidence may be presented for heightened scrutiny review; and</li> <li>• No - setting does not comply.</li> </ul> <p>The Missouri HCBS Waiver Settings Analysis is being submitted as one component of the transition plan.</p>			
Geographic Information System (GIS) Evaluation of HCBS Service Settings and Addresses	<p>DMH waivers:</p> <ul style="list-style-type: none"> <li>• DMH waivers will use GIS to analyze locations of individuals' service settings and addresses to identify potential areas with high concentration of settings that are subject to heightened scrutiny.</li> </ul> <p>DHSS waivers :</p> <ul style="list-style-type: none"> <li>• Adult day care settings will be mapped to determine service settings that need higher scrutiny.</li> <li>• AIDS waiver setting is identified as needing higher scrutiny. Doorways will work with DHSS to gather evidence to submit to CMS to consider.</li> <li>• All other DHSS services are provided in individual residences and are in compliance.</li> </ul>	12/16/14	03/30/15	<p>DMH waivers:</p> <ul style="list-style-type: none"> <li>• Addresses on MMIS Provider File - Provider Types 85, 26, 28, and 29, 58, 62, 94)</li> <li>• Addresses on MMIS Participant File for individuals in 1915c waivers</li> <li>• The DMH will utilize the participant and provider agency addresses from current Licensure and Certification LCARS database</li> </ul> <p>DHSS waivers: Provider File- Provider Type 29 and 26</p>
Initial Settings Assessment Tool Development	<p>State:</p> <ul style="list-style-type: none"> <li>• State will develop an initial settings assessment tool to be used by designated State staff for on-site reviews.</li> </ul>	02/01/14	12/15/14	<p>State:</p> <ul style="list-style-type: none"> <li>• Final HCBS Regulations</li> <li>• Missouri Modified "Exploratory</li> </ul>

	<p>DMH waivers:</p> <ul style="list-style-type: none"> <li>State staff will receive formal training on administering the tool prior to conducting on-site reviews.</li> </ul> <p>DHSS Waivers:</p> <ul style="list-style-type: none"> <li>MMAC to complete initial settings assessment</li> </ul>			<p>Questions to Assist States in Assessment of Residential Settings" herein referred to as Missouri Exploratory Questions for Assessment of HCBS Residential Settings</p> <ul style="list-style-type: none"> <li>Missouri Modified "Settings That Isolate" herein referred to as Missouri - Settings with the Potential Effect of Isolating Individuals Receiving HCBS Waiver from the broader community</li> <li>Initial Settings Assessment Tool</li> <li>Training</li> </ul>
Systemic Initial On-site Assessment	<p>DMH waivers:</p> <ul style="list-style-type: none"> <li>State will identify service settings that have the characteristics of HCBS Waivers or the qualities of an institution.</li> <li>Each service setting assessment will not exceed six months in duration.</li> <li>As assessments are completed for individuals served, summary of findings (including requirements for remediation) will be distributed to the individuals and service providers within 45 calendar days of the</li> </ul>	12/16/14	04/01/16	<p>DMH waivers:</p> <ul style="list-style-type: none"> <li>Provider Relations Heightened Scrutiny Settings Analysis</li> <li>2014 Settings Provider Self-Assessment Survey</li> <li>On-site assessment tool</li> <li>GIS mapping</li> <li>RAOSoft program</li> </ul>

	<p>completed on-site assessment.</p> <ul style="list-style-type: none"> <li>• A statistically valid sample size of settings (based on 95% confidence level) will be utilized for assessment.</li> <li>• This statistically valid sample with the 95% confidence level calculates to approximately 330 on-site assessments out of approximately 2,200 service sites. This sample will include information from the “Sources/Documents” Column.</li> <li>• Settings found to need state consideration of a state request to CMS for Heightened Scrutiny will be given priority of review by DMH.</li> </ul> <p>DHSS waivers:</p> <ul style="list-style-type: none"> <li>• MMAC will identify service settings that have the characteristics of HCBS Waivers or the qualities of an institution. MMAC will complete on-site visits of all 112 Adult Day Care providers and Doorways (AIDS Waiver provider)</li> </ul>			<p>for statistically valid sample size</p> <p>DHSS waivers:</p> <ul style="list-style-type: none"> <li>• Provider Relations Heightened Scrutiny Settings Analysis</li> <li>• 2014 Settings Provider Self-Assessment Survey</li> <li>• On-site assessment tool</li> <li>• RAOSoft program for statistically valid sample size</li> </ul>
Provider Enrollment Processes	<p>DMH waivers:</p> <ul style="list-style-type: none"> <li>• State will operationalize mechanisms to incorporate assessment of settings into existing processes for provider pre-enrollment screening, provider credentialing, and provider certification by the MO Department of Mental Health (DMH) and/or MO Department of Health and Senior Services (DHSS).</li> </ul> <p>DHSS waivers:</p> <ul style="list-style-type: none"> <li>• State will operationalize mechanisms to incorporate assessment of settings into existing processes for provider pre-enrollment screening, provider credentialing, and</li> </ul>	11/14/14	03/02/15	<p>State:</p> <ul style="list-style-type: none"> <li>• Operational Procedures</li> <li>• Provider Pre-Enrollment Screening Assessment Tool</li> <li>• HCBS Certification Review Tools</li> <li>• Provider Credentialing Tools</li> </ul>

	provider enrollment by the MO Department of Social Services (DSS), MMAC and Senior Services (DHSS).			
On-going On-site assessment	<p>DMH waivers:</p> <ul style="list-style-type: none"> <li>State will incorporate reviews of settings into existing quality integrated functions.</li> <li>As assessments are completed for individuals served, summaries of findings (including requirements for remediation) will be distributed to the individuals and service providers within 45 calendar days.</li> </ul> <p>DHSS waivers:</p> <ul style="list-style-type: none"> <li>State will incorporate reviews of settings into existing quality integrated functions.</li> </ul>	04/02/16	04/02/17 and on an Annual basis thereafter	<p>DMH waivers:</p> <ul style="list-style-type: none"> <li>Provider Relations Reviews</li> <li>Quality Enhancement Reviews to include National Core Indicators Surveys</li> <li>TCM Technical Assistance Coordinator Reviews</li> <li>Service Monitoring by Support Coordinators</li> <li>Licensure and Certification Reviews</li> <li>CIMOR EMT Contacts Process that includes anonymous input from individuals served and their advocates</li> </ul> <p>DHSS waivers:</p>

				<ul style="list-style-type: none"> <li>• Licensure and Certification Reviews</li> <li>• Provider Reviews</li> </ul>
Enrolled HCBS Waiver settings providers self-assessment development	<p>DMH waivers:</p> <ul style="list-style-type: none"> <li>• State will develop the Provider Self-Assessment to identify HCBS sites and to gather additional information from providers to assess sites of service that have characteristics of HCBS or the qualities of an institution. Providers will be required to submit the self-assessment annually.</li> </ul> <p>DHSS waivers:</p> <ul style="list-style-type: none"> <li>• State will develop the Provider Self-Assessment to identify HCBS sites and to gather additional information from providers to assess sites of service that have characteristics of HCBS or the qualities of an institution. Providers will be required to submit the self-assessment annually.</li> <li>• MMAC will be responsible for posting, facilitating and tracking the self-assessment</li> </ul>	10/01/14	02/01/15 and annually thereafter	<p>State:</p> <ul style="list-style-type: none"> <li>• 2014 Settings Provider Self-Assessment</li> <li>• Missouri Modified "Exploratory Questions to Assist States in Assessment of Residential Settings" herein referred to as Missouri Exploratory Questions for Assessment of HCBS Residential Settings</li> <li>• Missouri Modified "Settings That Isolate" herein referred to as Missouri - Settings with the Potential Effect of Isolating</li> <li>• Individuals Receiving HCBS Waiver from the broader community</li> </ul>



New HCBS Waiver settings providers self-assessments	DHSS Waivers: <ul style="list-style-type: none"> <li>New providers will be advised of the new CMS rule and directed to the self-assessment posted.</li> </ul>	Upon enrollment with MHD	Annually	
Enrolled HCBS Waiver settings providers self-assessment distribution	DMH Waivers: <ul style="list-style-type: none"> <li>The self-assessment will be released to providers on January 1 and due to the State by April 1, with results compiled by May 15. Results will be shared with the public.</li> </ul> DHSS waivers: <ul style="list-style-type: none"> <li>The self-assessment will be released to providers on January 1 and due to the State by April 1, with results compiled by May 15. Results will be shared with the public.</li> </ul>	01/01/16	05/15/16 and annually thereafter	<ul style="list-style-type: none"> <li>Missouri Modified "Exploratory Questions to Assist States in Assessment of Residential Settings" herein referred to as Missouri Exploratory Questions for Assessment of HCBS Residential Settings</li> <li>Missouri Modified "Settings That Isolate" herein referred to as Missouri - Settings with the Potential Effect of Isolating Individuals Receiving HCBS Waiver from the broader community</li> </ul>
Enrolled HCBS Waiver settings - Missouri Exploratory Questions distribution	DMH Waivers <ul style="list-style-type: none"> <li>State will release the "Missouri Exploratory Questions for Assessment of HCBS Waiver Settings" document to assist providers in identifying if services are integrated in and have access to supports in the community, including opportunities to seek employment,</li> </ul>	01/01/15	01/01/15	<ul style="list-style-type: none"> <li>Missouri Modified "Exploratory Questions to Assist States in Assessment of Residential Settings" herein referred to as Missouri Exploratory</li> </ul>

	<p>work in competitive integrated settings, engage in community life, and control personal resources when completing the provider self-assessment.</p> <p>DHSS Waivers:</p> <ul style="list-style-type: none"> <li>State will release the “Missouri Exploratory Questions for Assessment of HCBS Waiver Settings” document to assist providers in identifying if services are integrated in and have access to supports in the community, including opportunities to seek employment, work in competitive integrated settings, engage in community life, and control personal resources when completing the provider self-assessment.</li> </ul>			<p>Questions for Assessment of HCBS Residential Settings</p> <ul style="list-style-type: none"> <li>Missouri Modified “Settings That Isolate” herein referred to as Missouri - Settings with the Potential Effect of Isolating Individuals Receiving HCBS Waiver from the broader community</li> </ul>
Missouri HCBS Waiver Participant Survey Development	<p>State:</p> <ul style="list-style-type: none"> <li>State will develop an on-line participant survey to collect individual experiences to determine if service settings are in compliance with HCBS Waiver settings rule.</li> <li>The survey will include identification of the service setting, so the state can utilize this information in a follow up to the setting.</li> <li>The survey will provide the option for anonymity or to include contact information if they would like the state to discuss with them. If the participant discloses contact information, the state will do an on-site assessment.</li> </ul>	11/01/14	12/31/14	<p>State:</p> <ul style="list-style-type: none"> <li>Missouri HCBS Waiver Participant Survey</li> </ul>

Missouri HCBS Waiver Participant Survey	DMH waivers: <ul style="list-style-type: none"> <li>The survey will be released annually January 1 through December 31 with results compiled and report issued by March 1st. Results will be shared with the public.</li> </ul>	01/01/15	12/31/15 and annually thereafter	
Assessment Results Report	DMH waivers: <ul style="list-style-type: none"> <li>State compiles and analyzes findings of assessments and surveys. Findings will be presented to CMS, Missouri leadership and stakeholders beginning with initial assessment and annually thereafter.</li> </ul> DHSS Waivers: <ul style="list-style-type: none"> <li>DSS and DHSS compile and analyze findings of assessments and surveys. Based on these findings, the state will follow-up as appropriate.</li> </ul>	04/30/16	06/01/16 and Annually Thereafter	State: <ul style="list-style-type: none"> <li>Assessments and surveys</li> </ul>
<b>Section 2: Remediation Strategies</b> Missouri proposes a remediation process that will capitalize on existing HCBS Waiver quality assurance processes including provider identification of remediation strategies for each identified issue, and on-going review of remediation status and compliance. The state may also prescribe certain requirements to become compliant. Missouri will also provide guidance and technical assistance to providers to assist in the assessment and remediation process. Providers that fail to remediate non-compliant settings timely may be subject to sanctions in accordance with 13 CSR 70-3.030 and/or 9 CSR 45-5.060.				
<b>Action Item</b>	<b>Description</b>	<b>Proposed Start Date</b>	<b>Proposed End Date</b>	<b>Sources/Documents</b>

Informational Letters	<p>State:</p> <ul style="list-style-type: none"> <li>State will draft and finalize informational letters describing proposed transition, appropriate HCBS Waiver settings, deadlines for compliance, and technical assistance availability. This includes all of the letters that the state will be sharing with stakeholders throughout the process over the next few years.</li> </ul>	06/23/14	04/01/17	<p>State:</p> <ul style="list-style-type: none"> <li>CMS Guidance</li> <li>Proposed Transition Plan</li> <li>CFR</li> </ul>
Missouri Code of State Regulations (CSR) Review	<p>State:</p> <ul style="list-style-type: none"> <li>State will review administrative rules to determine if revisions are needed to reflect federal regulations on HCBS settings.</li> </ul>	10/01/14	03/01/15	<p>State:</p> <ul style="list-style-type: none"> <li>CMS Guidance</li> <li>Proposed Transition Plan</li> <li>CFR</li> <li>Missouri 13 CSR 70</li> <li>Missouri 9 CSR 45</li> <li>Missouri 19 CSR 15</li> <li>Missouri 19 CSR 30-90</li> </ul> <p>DHSS waivers:</p> <ul style="list-style-type: none"> <li>13 CSR 65-2</li> </ul>
Missouri Code of State Regulations (CSR) Filing	<p>State:</p> <p>State will file changes to administrative rules to as needed to reflect federal regulations on HCBS settings.</p>	03/01/15	10/01/16	<p>State:</p> <ul style="list-style-type: none"> <li>CMS Guidance</li> <li>Proposed Transition Plan</li> <li>CFR</li> <li>Missouri 13 CSR 70</li> <li>Missouri 9 CSR 45</li> <li>Missouri 19 CSR 15</li> <li>Missouri 19 CSR 30-90</li> </ul> <p>DHSS waivers:</p> <p>13 CSR 65-2</p>

Provider Manual Revisions	<p>State:</p> <p>State will revise HCBS provider manuals to incorporate HCBS final rule requirements. Manuals will be reviewed to determine if revisions needed to include HCBS Waivers setting thresholds and will prohibit new sites from being accepted or enrolled that have an institutional or isolating quality while presenting deadlines for enrolled providers to come into compliance. Rules will clarify expectations of member control of their environment and access to community.</p>	01/01/2015	12/31/2015	<p>State:</p> <ul style="list-style-type: none"> <li>• CMS Guidance</li> <li>• Proposed Transition Plan</li> <li>• CFR</li> <li>• Provider Manuals</li> </ul>
Incorporate Education and HCBS Waiver Compliance Understanding into Provider Enrollment	<p>State:</p> <ul style="list-style-type: none"> <li>• State will make adjustments to ensure that HCBS Waiver settings are evaluated when appropriate. Process will include - When agencies enroll to provide HCBS Waiver services, they will be provided information on HCBS setting requirements and be required to certify that they have received, understand, and comply with these setting requirements.</li> <li>• Thereafter, ongoing monitoring by division quality integrated functions (to include Provider Relations Reviews and Licensure and Certification Reviews) will be conducted to ensure compliance with the HCBS requirements.</li> <li>• DHSS waivers: MMAC will monitor and verify setting compliance for all Adult Day Care Providers and Doorways at each revalidation.</li> </ul>	11/16/14	02/01/15 and Annually thereafter	<p>State:</p> <ul style="list-style-type: none"> <li>• Missouri HCBS Waiver Settings Analysis</li> <li>• Missouri Exploratory Questions for Assessment of HCBS Residential Waiver Settings</li> <li>• Missouri - Settings with the Potential Effect of Isolating Individuals Receiving HCBS from the Broader Community</li> <li>• Provider Enrollment Tools</li> <li>• Provider Agreement</li> </ul> <p>DHSS waivers:</p> <ul style="list-style-type: none"> <li>• MMAC will</li> </ul>

				provide information to HCBS providers during Annual Provider Update Meetings held biannually and Provider Certification Trainings held quarterly hosted by MMAC.
Provider Update Meetings and Trainings	<p>DMH Waivers:</p> <ul style="list-style-type: none"> <li>DMH will provide information to HCBS providers via webinars and during quarterly provider meetings (new information updates provided) - in each region. Webinars will be posted on the DMH website and providers informed by email when webinars have been posted.</li> </ul> <p>DHSS Waivers:</p> <ul style="list-style-type: none"> <li>MMAC will provide information to HCBS providers during Annual Provider Update Meetings and Provider Certification Trainings, hosted by MMAC.</li> </ul>	06/23/14	04/01/17 and quarterly thereafter	<p>State:</p> <ul style="list-style-type: none"> <li>Missouri HCBS Waiver Settings Analysis</li> <li>Missouri Exploratory Questions for Assessment of HCBS Residential Waiver Settings</li> <li>Missouri - Settings with the Potential Effect of Isolating Individuals Receiving HCBS from the Broader Community</li> <li>Provider Enrollment Tools</li> <li>Provider Agreement</li> </ul>

				DHSS waivers: MMAC will provide information to HCBS providers during Annual Provider Update Meetings held biannually and Provider Certification Trainings held quarterly hosted by MMAC.
HCBS Waiver Settings Assessment Findings	<p>DMH waivers:</p> <ul style="list-style-type: none"> <li>DMH will present individuals and service providers with the results of the assessment. The summary of findings (including requirements for remediation) will be distributed to the individuals and service providers within 45 calendar days of each on-site setting assessment.</li> </ul> <p>DHSS Waivers: DHSS will present individuals and service providers with the results of the assessment.</p>	12/16/14	05/15/16 and Annually thereafter	<p>DMH waivers:</p> <ul style="list-style-type: none"> <li>Assessment and surveys listed in this document</li> </ul>

Provider Individual Remediation	DMH waivers: <ul style="list-style-type: none"> <li>HCBS Waiver providers will submit a remediation plan within 45 calendar days from the issuance of the summary of assessment findings for any settings that require remediation. This plan will provide detail about the steps to be taken to remediate issues and the expected timelines for compliance. State review of remediation plans will consider the scope of the transition to be achieved and the unique circumstances related to the setting in question. The state will allow reasonable timeframes for large infrastructure changes with the condition that the Waiver providers receive department approval and provide timely progress reports on a regular basis.</li> </ul>	03/02/15	03/17/2017	State: <ul style="list-style-type: none"> <li>Missouri HCBS Settings Analysis; Missouri Exploratory Questions for Assessment of HCBS Residential Settings</li> <li>Missouri – Waiver Settings with the Potential Effect of Isolating Individuals Receiving HCBS from the Broader Community</li> </ul>
	DHSS waivers: <ul style="list-style-type: none"> <li>MMAC will send a letter of non-compliance to the provider by postal mail. In this letter, providers will be notified of any found deficiencies and will be given a time-frame (30 days) to correct said deficiencies.</li> <li>Providers that become compliant during this time frame will be subject to a review to verify compliance. Providers that are not compliant within the given time frame will be sent to our Sanctions Committee</li> </ul>	07/01/2015	3/17/2017	



	<p>for review.</p> <ul style="list-style-type: none"> <li>If sanctions are identified, the provider will be sent a letter from our Terminations Department. The letter will identify any sanctions, include the date that the sanction(s) become effective and notify the provider of their AHC appeal rights.</li> </ul>			
Periodic Provider Remediation Status Updates	<p>State:</p> <ul style="list-style-type: none"> <li>Providers will be required to submit periodic status updates on remediation progress.</li> </ul>	03/02/15	3/17/18	<p>State:</p> <ul style="list-style-type: none"> <li>Missouri HCBS Settings Analysis; Missouri Exploratory Questions for Assessment of HCBS Residential Settings</li> <li>Missouri – Waiver Settings with the Potential Effect of Isolating Individuals Receiving HCBS from the Broader Community</li> </ul>
State Response to Provider Individual Remediation	<p>DMH Waivers:</p> <ul style="list-style-type: none"> <li>The state will accept the plan or may ask for changes to the plan. The state may pre-set remediation requirements for each organization's HCBS Waiver settings.</li> </ul>	03/02/15	3/17/18	<p>State:</p> <ul style="list-style-type: none"> <li>Missouri HCBS Settings Analysis; Missouri Exploratory Questions for</li> </ul>

	<p>DHSS Waivers:</p> <ul style="list-style-type: none"> <li>Providers that become compliant during this time frame will be subject to a review to verify compliance. Providers that are not compliant within the given time frame will be sent to our Sanctions Committee.</li> </ul>			<p>Assessment of HCBS Residential Settings</p> <ul style="list-style-type: none"> <li>Missouri – Waiver Settings with the Potential Effect of Isolating Individuals Receiving HCBS from the Broader Community</li> <li>Provider Remediation plans</li> </ul>
Assessment Results Report – State level Remediation	<p>State:</p> <ul style="list-style-type: none"> <li>After findings from settings assessments and provider and individual surveys have been presented to CMS, Missouri leadership and stakeholders, the State will work with stakeholders to develop Remediation strategies for systems processes changes. Global systems enhancement might include revisions to existing integrated quality monitoring processes and enhanced HCBS provider and support coordination trainings</li> </ul>	06/01/16	03/17/17 and Annually thereafter	<p>State:</p> <ul style="list-style-type: none"> <li>Assessments and surveys</li> </ul>
Data Collection	<p>State:</p> <ul style="list-style-type: none"> <li>State will collect data from reviews, technical assistance, updates, etc. to track status of remediation efforts.</li> </ul>	09/10/14	04/02/17 and Annually thereafter	<p>State:</p> <ul style="list-style-type: none"> <li>Electronic tools developed to capture data</li> </ul>
Departmental Management Report	<p>State:</p> <ul style="list-style-type: none"> <li>Data will be reported on a regular basis to Missouri departmental management and CMS.</li> </ul>	09/10/14	04/02/17 and Annually thereafter	

On-going Compliance Reviews	State will conduct on-going reviews to establish and monitor levels of compliance reached by providers with non-HCBS settings following completion of their remediation schedule.	04/02/15	04/02/16 and Annually thereafter	DMH waivers: <ul style="list-style-type: none"> <li>• Provider Relations Reviews</li> <li>• Quality Enhancement Reviews to include National Core Indicators Surveys</li> <li>• TCM Technical Assistance Coordinator Reviews</li> <li>• Service Monitoring by Support Coordinators</li> <li>• Licensure and Certification Reviews</li> <li>• CIMOR EMT Contacts Process that includes anonymous input from individuals served and their advocates</li> </ul> DHSS waivers: <ul style="list-style-type: none"> <li>• Provider Reviews</li> <li>• Licensure and Certification Reviews</li> </ul>
Provider Sanctions	State: <ul style="list-style-type: none"> <li>• State will sanction providers in accordance with 13 CSR 70-3.030 and/or 9 CSR 45-5.060 (add DHSS CSR) that have failed to meet</li> </ul>	02/03/15	3/16/15 and ongoing on an individual	State: <ul style="list-style-type: none"> <li>• Sanction Template Letter</li> </ul>

	remediation standards and failed to cooperate with the HCBS Settings Transition.		provider basis	
Individuals Transition to settings that align with HCBS requirements	<p>State:</p> <ul style="list-style-type: none"> <li>If relocation of individuals is necessary, the state will work with the individuals to ensure that individuals are transitioned to settings meeting HCBS Setting requirements. Individuals will be given timely notice and due process, and will have a choice of alternative settings through a person-centered planning process. Transition of individuals will be comprehensively tracked to ensure successful placement and continuity of Waiver service.</li> </ul>	03/16/15	05/01/15 and ongoing on an individual basis	<p>DMH waivers:</p> <ul style="list-style-type: none"> <li>Sanction Template Letter; Notice of Decision (including appeal rights)</li> <li>Data warehouse query of members affected and corresponding support coordinators, service workers, and care coordinators</li> </ul> <p>DHSS waivers:</p> <ul style="list-style-type: none"> <li>Sanction Template Letter; Notice of Decision (including appeal rights)</li> <li>Data warehouse query of members affected service workers, and case managers.</li> </ul>

### Section 3: Public Comment

Missouri proposes to collect public comments on the transition plan in-person during two public forums. Missouri will also offer a conference line during the public forums. Missouri will provide an address for the public to mail in public comments as well. Through a series of stakeholder forums conducted throughout the state, Missouri will receive comments from our

stakeholders. In addition to posting the transition plan and related materials on the Missouri MO HealthNet website, numerous stakeholders were contacted directly and provided with transition plan documents and information on the stakeholder forums. Stakeholders contacted include Missouri Association of County Developmental Disabilities Services (MACDDS), Missouri Association of Rehabilitation Facilities (MARF), Developmental Disabilities (DD) Council, People First, and The Arc.

Additionally for DHSS waivers: Adult Day Care Association, Leading Age.

Action Item	Description	Proposed Start Date	Proposed End Date	Sources/Documents
Announcement of Public Comment Period	State: <ul style="list-style-type: none"> <li>State released a Summary document, the Draft Transition Plan, and Draft Settings Analysis on the state website. A newspaper and an email blast will be released and the stakeholders will be contacted directly to inform them of the opportunity to provide public comment.</li> </ul>	12/29/14	03/07/15	State: <ul style="list-style-type: none"> <li>Draft Transition Plan</li> <li>Draft Settings Analysis</li> <li>HCBS Settings Summary document</li> <li>Newspaper release on 12/30/2014</li> <li>Email blast on 12/30/2014</li> </ul>
Public Comment Period and Meetings - Proposed Transition Plan	State: <ul style="list-style-type: none"> <li>State commenced stakeholder forums, shared proposed transition plan with public, collected comments, developed state responses to public comments, and incorporated appropriate suggestions into transition plan. The state will continue to document all iterations of the transition plan. The Response to Public Comments document is included in the Transition Plan.</li> </ul>	12/29/14	03/07/15	State: <ul style="list-style-type: none"> <li>Draft Transition Plan</li> <li>State Response to Public Comments Document</li> </ul>
Public Comment Retention	State: <ul style="list-style-type: none"> <li>State will safely store public comments and state responses for CMS and public</li> </ul>	12/29/14	03/17/2019	State: <ul style="list-style-type: none"> <li>Public Comment and State Response</li> </ul>

	consumption.			Document
Posting of Transition Plan Iterations	State: <ul style="list-style-type: none"> <li>State will post each approved iteration of the transition plan to its website.</li> </ul>	12/29/14	03/17/15	State: <ul style="list-style-type: none"> <li>Transition Plan</li> <li>Rationale for Changes Made</li> </ul>
Assessment Findings Report	DMH waivers: <ul style="list-style-type: none"> <li>State posts the findings of the on-site assessments and remedial strategies annually by August 1.</li> </ul>	07/01/16	08/01/16 and Annually thereafter	DMH waivers: <ul style="list-style-type: none"> <li>Data compiled from documents</li> <li>Remedial strategies included at aggregate level</li> </ul>