KENTUCKY
Cabinet for Health and Family Services

DEPARTMENT FOR MEDICAID SERVICES
(DMS)

HCB Final Rule Transition Plan for Michelle P Waiver
July 25, 2014
The purpose of this transition plan is to outline the key activities that the Kentucky Department for Medicaid Services will facilitate to transition its Michelle P Waiver to become compliant with the recently released final rule pertaining to Home and Community Based Services over the next five years.
Overview

Asess CHFS policy/operations and HCB settings

Define requirements to align with HCB final rule

Identify changes required to comply with HCB final rule

Plan steps required to transition towards compliance

Execute transition plan

Monitor transition

Communicate and Engage

Assess
Define
Identify
Plan
Execute
Monitor

Update based on CMS feedback
### Assess

#### Key State Activities

- **Gather**
  - Gather claims and other provider data sources
  - Compile state policy and operations documents pertaining to HCB settings
  - Conduct detailed surveys/questionnaires of providers, members, and stakeholders to assess individual setting compliance
  - Complete site visits to provider locations to confirm survey/questionnaire responses

- **Analyze**
  - Review state policy and operations documents to document areas of impact
  - Analyze data to categorize each setting into the following group:
    - Compliant: Currently complies with HCB final rule requirements
    - Not Compliant: Does not currently comply, but has opportunity to become compliant

#### Key Stakeholder Activities

- Complete surveys/questionnaires
- Provide input on compliant / non-compliant setting characteristics
Define

Key State Activities
- Define Kentucky-specific HCB requirements to comply with HCB final rule

Key Stakeholder Activities
- Provide feedback on KY-specific requirements
### Key State Activities

- Identify changes required to categories of settings that are not in compliance
- Document rationale preventing non-compliant settings from becoming compliant
- Identify changes required to state policy/operations
  - Policy
    - Kentucky Administrative Regulation
    - CMS Waiver Application
  - Operations
    - Provider manuals and documentation
    - System changes
    - Communications

### Key Stakeholder Activities

- Provide feedback on changes identified for provider settings
- Provide feedback on rationale for non-compliance
Plan

Communicate and Engage

Assess | Define | Identify | Plan | Execute | Monitor

Key State Activities
• Identify detailed steps required for compliance
• Develop detailed compliance strategy work plan

Key Stakeholder Activities
• Provide feedback compliance strategy
## Execute / Monitor

### Communicate and Engage

<table>
<thead>
<tr>
<th>Assess</th>
<th>Define</th>
<th>Identify</th>
<th>Plan</th>
<th>Execute</th>
<th>Monitor</th>
</tr>
</thead>
</table>

### Key State Activities

<table>
<thead>
<tr>
<th>Execute</th>
<th>Monitor</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Key State Activities</strong></td>
<td><strong>Key State Activities</strong></td>
</tr>
<tr>
<td>• Carry out transition activities identified in work plan</td>
<td>• Provide regular monitoring and oversight of transition activities</td>
</tr>
<tr>
<td></td>
<td>• Report on key outcomes metrics for members and providers</td>
</tr>
</tbody>
</table>

### Key Stakeholder Activities

<table>
<thead>
<tr>
<th>Execute</th>
<th>Monitor</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Key Stakeholder Activities</strong></td>
<td><strong>Key Stakeholder Activities</strong></td>
</tr>
<tr>
<td>• Participate in transition activities</td>
<td>• Review regular reporting</td>
</tr>
<tr>
<td>• Provide feedback throughout transition</td>
<td>• Provide ongoing feedback</td>
</tr>
</tbody>
</table>
## Timeline of Activities

<table>
<thead>
<tr>
<th></th>
<th>2015</th>
<th>2016</th>
<th>2017</th>
<th>2018</th>
<th>2019</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Assess</strong></td>
<td>Q1 Q3</td>
<td>Q1 Q2</td>
<td>Q1 Q2</td>
<td>Q1 Q2</td>
<td>Q1 Q2</td>
</tr>
<tr>
<td><strong>Define</strong></td>
<td></td>
<td>Q1 Q2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Identify</strong></td>
<td></td>
<td></td>
<td>Q1 Q2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Plan</strong></td>
<td></td>
<td></td>
<td></td>
<td>Q1 Q2</td>
<td></td>
</tr>
<tr>
<td><strong>Execute/Monitor</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Q1 Q2</td>
</tr>
</tbody>
</table>

Legend: Green bars indicate the duration of the activities.