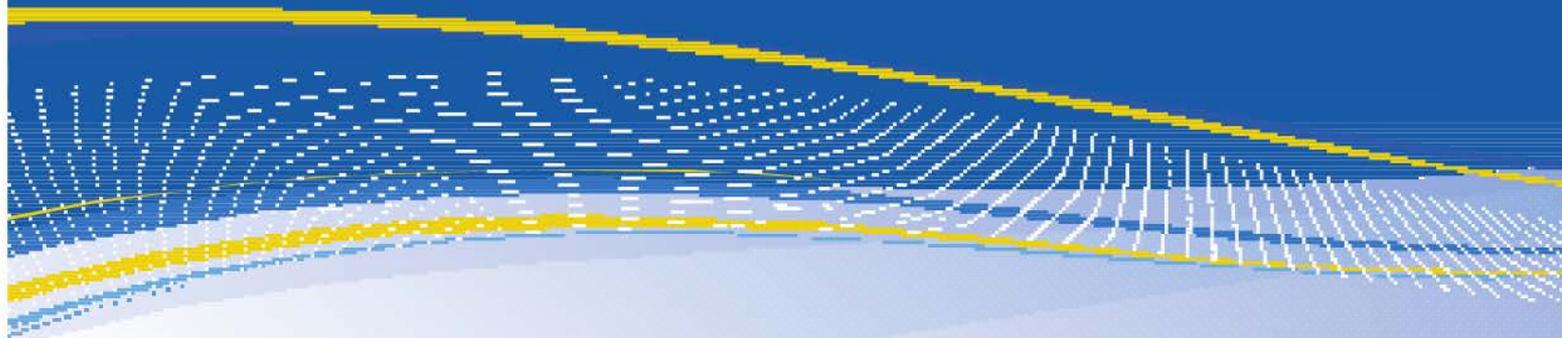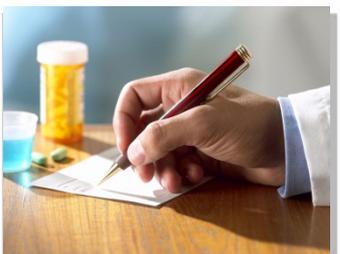# Documenting Barriers and Ensuring Forward Motion

Division of Long-Term Services and Supports
Disabled and Elderly Health Programs Group
Centers for Medicaid and CHIP Services

Objectives for Today's Session

- Identify how states measure success in implementing the milestones identified in the Statewide Transition Plan (STP), using methods of ongoing data tracking and monitoring

- Assist states to identify barriers in operationalizing the STP objectives/milestones

- Consider methods to address/resolve the impediments or barriers to successful implementation of the STP

CMS' Methods to Measure Success

- Milestones are the key steps to monitoring and tracking the state's success in implementing its STP.

- CMS will track milestones in the STP website that is used for STP submissions and will only track specific standardized milestones with the states.

- States can add milestones identified internally to assist in tracking intermediate steps to completion.

- Intent is for states to use milestone charting as a tool to assist in the implementation process.

- Not a requirement, but quarterly progress updates provide a mechanism to ensure continued compliance.

Identifying Barriers to Success & Creating Successful Solutions

➢ Recognizing the barriers that are inhibiting forward motion is only part of the puzzle.

➢ Creating successful solutions to overcome those obstacles provides the momentum for effective implementation of the Statewide Transition Plan.

State Self-Assessment

➢ **Where are we on the path to successful implementation of the STP?**

➢ **What have we done to alter course if we are experiencing barriers to success?**

➢ **What are the next steps to overcome roadblocks and to create forward momentum?**

Identifying Barriers to Success (1 of 2)

<u>Factors a state should consider when it is not making forward progress and is not meeting its milestones:</u>

- ➢ Timelines
- ➢ Systemic/statewide or localized?
- ➢ State-wide or specific to a provider or group of providers?
- ➢ Lack of providers

Factors a state should consider when it is not making forward progress and is not meeting its milestones, continued:

➢ Lack of resources/funding

➢ Lack of transportation

➢ Stakeholder concerns

Identifying Barriers to Success (1)

Timelines:

- Self-assessment:
  - Has the state consistently had difficulty meeting milestone deadlines?
  - Has the state initiated any corrective action to reasonably and successfully overcome this obstacle?
  - Has the state reallocated its timelines to meet the adjusted 2022 compliance deadline and utilized this additional time effectively?

Overcoming Timeline Barriers

Timelines:

➢ Is the timeline correct/still accurate?

➢ Where is the state on the projected timeline?

➢ Did the state accurately anticipate the amount of time needed to accomplish the milestone?

➢ Did intervening barriers hamper forward progress?

Overcoming Timeline Barriers (cont.)

Timelines:

➢ Has the state reassessed the impact of those barriers?

➢ Have new issues been identified?

➢ Can the state foresee any additional time delays?

➢ Is the state ready to establish new, more accurate timelines?

➢ Communicate requested changes to CMS.

Kansas's Experience

➢ Kansas: Realigns to meet timelines and come into compliance with the systemic assessment requirements of the settings rule.

Identifying Barriers to Success (2)

Systemic/statewide or localized?

➢ Does the state need to move up the timeframe on its systemic remediation?

➢ Are county or local government policies and procedures creating the challenge to successful remediation?

➢ Can the state pinpoint the source of the problem?

Overcoming Systemic Barriers

Systemic/statewide or localized?

➢ What strategies does the state have in place to resolve the issue(s)?

➢ What resources does the state have available to ameliorate or eliminate the problem?

➢ Can the state develop support with its constituencies to help educate stakeholders to better understand the issues with the goal of reaching workable solutions?

Idaho's Experience

➢ Idaho: Challenges fueled by the demographics of the state including four types of providers that needed bolstering to come into compliance with the rule, as well as a lack of available services and supports due to a large increase in the state's population base.

Identifying Barriers to Success (3)

Tied to a specific provider or group of providers?

Overcoming Provider Barriers
(1 of 4)

<u>Tied to a specific provider or group of providers?</u>

➢ Has the state identified the source of the problem?

➢ Are providers reluctant to alter their service delivery models?

➢ Or are they uncertain about how to implement the settings regulations?

Overcoming Provider Barriers
(2 of 4)

Tied to a specific provider or group of providers?

➢ Has the state shared its value-based principles and practices with providers so that everyone is on the same page?

➢ Has the state shared the strategies and tactics it will use to assist providers with compliance?

➢ Has the state provided a roadmap of its expectations and requirements so that there is a clear indication of what the state is looking for?

<u>Tied to a specific provider or group of providers?</u>

➢ Has the state thoroughly explained the process/methods it will use to determine if a setting is in compliance?

➢ Has the state shared any tools that it has developed to assist providers with the process?

➢ Has the state provided a forum for conversation and feedback to give providers a voice in system transformation?

➢ Ensure transparency and open communication will facilitate forward motion.

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Tied to a specific provider or group of providers?

➢ Does the state support providers to develop a community of practice model to share experiences and concerns and to provide a voice with state leadership?

➢ Has the state identified providers who have successfully implemented changes and can share their expertise?

➢ Has the state provided on-site or remote technical assistance, training or mentoring to assist providers to better understand and come into compliance with the rule?

Identifying Barriers to Success (4)

Lack of providers:

➢ Self-Assessment:
- The state has identified a lack of available providers to offer/expand the numbers and types of services to participants.

Overcoming a Lack of Providers

Lack of providers:

➢ Has the state developed strategies/methods to increase the provider pool?

➢ Has the state helped providers develop new business plans to move successfully from bricks and mortar to more community integrated services and supports?

➢ Has the state considered a pay for performance model inside the HCBS waivers/state plan amendments or other creative rate methodologies to incentivize providers?

Tennessee's Experience

➢ Tennessee: Developed a variety of value-based payment approaches to align financial incentives for providers in its Employment and Community First CHOICES Managed Long Term Services and Supports Program and is in the process of cross-walking many of these same components into the state's Section 1915(c) Waiver Programs.

Identifying Barriers to Success (5)

Lack of resource/funding issues:

➤ Self-Assessment:

- The state identified inadequate resources or funding issues to accomplish the milestones identified in the STP.

Overcoming a Lack of Resources

Lack of resources/funding issues:

➢ Is there a lack of funding or available resources?

➢ Is the state, county or local funding stream the source of the problem?

➢ Has the state initiated talks with local or county officials who might assist with identifying available resources?

➢ Can the state identify optional funding streams?

Overcoming a Lack of Resources (cont.)

Lack of resource/funding issues:

➤ Has the state developed a relationship with key legislators to champion their cause?

➤ Are there new or innovative resources that the state could tap?

➤ Are there university or special interest groups that may want to partner with the state to provide intellectual capital?

Washington's Experience

➢ Washington: Used existing resources to implement an expanded database to monitor on-going compliance with the settings rule.

Identifying Barriers to Success (6)

Lack of transportation:

➢ Self-Assessment:

- ▪ Because of its demographics, the state has identified that lack of viable transportation options is inhibiting successful implementation of its STP.

Overcoming a Lack of Transportation

Lack of transportation:

➢ Is lack of available transportation an issue?

➢ If so, is it an issue throughout the state or with specific geographic locations such as rural areas?

➢ Has the state solicited input from stakeholders to help problem-solve?

➢ Connected with state or local experts in transportation services to identify alternatives/options/methods to make transportation available and accessible?

Overcoming a Lack of Transportation (cont.)

Lack of transportation:

➢ Has the state determined how it can customize supports and services to facilitate accessible transportation?

➢ Has the state connected individuals with public transportation options?

➢ Has the state developed alternative options such as linking individuals with other commuters or by providing training on utilizing transportation option for individuals?

Identifying Barriers to Success (7)

Stakeholder concerns:

➢ Self-Assessment:

- Key stakeholder groups have concerns with implementation approaches and are reluctant to make changes to comport with the federal regulations.

Overcoming Barriers to Stakeholder Concerns

<u>Stakeholder concerns:</u>

➢ Is a lack of understanding prohibiting commitment and change?

➢ Has the state worked with advocacy groups to provide education about the rule and its positive impact on individuals if this is needed?

➢ Has the state engaged the help of advocacy groups to help support individuals, families or guardians?

Overcoming Barriers to Stakeholder Concerns (cont.)

Stakeholder concerns:

➢ Has the state enlisted the expertise of self-advocates/individuals/family members to speak with individuals, families and guardians about specific issues?

➢ Has the state engaged organizations to provide educational resources both internally and from other states who have dealt with similar issues?

Ohio's Experience

➢ Ohio: Met with stakeholder concerns when it attempted to "revolutionize" the state's employment and day services.

Identifying Barriers to Success (8)

Quality Assurance Performance Measures:

➢ Self-Assessment:

- ▪ Does the state's Quality Assurance performance measure review shed any light or provide any data on the potential cause of the problem inhibiting the completion of the milestone?

Snapshot into Milestone Data
(1 of 4)

The ability to track all states across standard milestones will provide additional information and insight into the nationwide implementation of the settings criteria. It also offers the potential to provide more tailored technical assistance to states and assure they are on track to meet the progressive targets necessary for full implementation of the settings regulation by March 17, 2022.

Snapshot into Milestone Data
(2 of 4)

As of June 30, 2018

➢ 27 states have submitted updated milestone templates to CMS and have milestones with dates recorded in the STP Tracking System;

➢ Of the 27 states:

- Average number of state milestones: 36

- Total milestones completed: 287 of 969

- 13 states have 25% or less of milestones completed.

As of June 30, 2018

- 21 states have completed the Systemic Assessment.
- 12 states have completed the Site-Specific Assessment.
- 9 milestones have been revised.
- 45 milestones have been delayed.
- 38 milestones are past due.

Snapshot into Milestone Data
(4 of 4)

Remedial Action Completed:	25%	50%	75%	100%
Residential Provider	11	7	5	1
Non-Residential Provider	15	9	6	2
Community/ Resolution of Beneficiary Concerns	6	4	3	3

Snapshot into Milestone Data/Themes
(1 of 2)

As of June 30, 2018:

➤ Some states have modified their timelines based on the CMS guidance that all transition activities may be extended through March 17, 2022;

➤ The process for a state to modify rules and regulations can involve numerous steps and entities, often taking several months or more to implement change. States are experiencing delays with these processes.

Snapshot into Milestone Data/Themes (2 of 2)

As of June 30, 2018

➢ The site-specific assessments are consistently taking longer than anticipated by states;

➢ Modifying dates for a specific milestone may create the need for states to review their timelines and make changes to subsequent milestones.

Review of Barriers to Successful Implementation of the STP

- Timelines
- Systemic/statewide or localized?
- State-wide or specific to a provider or group of providers?
- Lack of providers
- Lack of resources/funding
- Lack of transportation
- Stakeholder concerns

Path to Success

The consistent theme throughout today's discussion reinforces the fact that successful intervention strategies are transparent in development and operation and support open communication.

Resources
(1 of 2)

Central Office Contacts: Division of Long Term Services and Supports:

❖ **HCBS@cms.hhs.gov**

❖ **HCBS Training Series**—Webinars presented during training calls are located in the link below:

https://www.medicaid.gov/medicaid/hcbs/training/index.html

Home and Community-Based Statewide Transition Plan (STP) website: https://hcbscms.sharepoint.com/sites/hcbs

Tennessee's Intellectual Disability Waiver Amendments, Updated: May 18, 2018

https://www/tn.gov/content/dam/tn/tenncare/documents/SummaryAndDescription.pdf

Questions and Answers

We would now like to open the lines for Questions and Answers

Feedback

Please complete a brief survey to help CMS monitor the quality and effectiveness of our presentations.

Please use the survey link
https://www.surveymonkey.com/r/DocumentingBarriers

Located in the Chat Room or on the last page of your downloaded presentation to access the survey.

(The survey link CAN'T be opened within Web-Ex)

WE WELCOME YOUR FEEDBACK!