

Final Rule Stakeholder Call

Topic:

1/ 17/ 2018

Progress Report: Transition Plan Update and Person Centered Service Plan Policy

NOON CALL (# PARTICIPANTS ON THE LINE, 68)

1. When was the rework policy posted? The copy I have is not the most recent
 - a. KDADS: It was posted the end of December, around the 28th.
2. The Participant Interest Inventory is referenced as the PII in the draft policy. It says that the PII is replacing the person centered support plan for IDD waiver participants. Could you explain how it will meet the regulation that specifically states that a person centered support plan is required?
 - a. KDADS: The state is currently still deciding how we are going to work that. We have a couple of options and the leadership is discussing that internally. We are looking at what's going to require a waiver amendment and what will require a statute amendment. There is no final decision at this time, we have taken multiple comments to that point and we are taking them into consideration.
3. I have a question about the P2I. Are you looking at it as being a standardized document or individualized for each person? I don't understand how this will work. I'm trying to figure out if this is person centered planning or if it's a check the box exercise. If we could get more guidance on that it will be easier to comment on it.
 - a. KDADS: The intent behind the PII is that you have a group of waiver individuals that have a person centered service plan used to build and direct their services. We would like to extend that same approach to the rest of the waivers because they currently don't have anything like that. The intention is to extend this service, which we think is great, to the rest of the waivers. There is a draft PII that was originally developed to go with the first policy. Again we are looking at how this aligns with the support plan. The original draft states that it is consistent with 30-63 article. The idea is that there would be a standard set of open ended questions, to make sure we identify all the pieces in the person centered service plan. This would be standardized, for those who don't have a TCM, across all MCO's and individuals to make sure we get all information, and so we will not exclude anything. It would also be our intent to make it available for input and review before it is finalized.
 - b. Is there a web site where we can take a look at this draft?
 - c. KDADS: It is not available yet because it is pending KDADS leadership decision.
4. My question is related to how an IDD service provider is going to be held accountable for the licensing if this person centered service plan and PII document come to resolution. How would licensing staff hold the provider accountable for delivery of services when the MCO is writing this plan? Does that accountability go back to the MCO?
 - a. KDADS: I'm not able to speak to licensing requirements, but we will pass the question on to the survey credentialing and certification team, to make sure I don't botch it.
5. Can you give some insight as to how PII became the word of choice? For years our families that utilize the IDD waiver are familiar with person centered support plan. We're looking at that and

I'm curious as to how that term was come up with. I understand in order to make Final Rule the MCOS might have to use the person centered service plan but I'm curious as to how that change came to be.

- a. KDADS: I'm not aware of the history as to how that term came to be, but we have taken that comment and I can research that.
6. Has there been any consideration from leadership about the implementation of the Life Course framework as part of Personal Interest Inventory? Has KDADS considered integrating the Life Course framework into the PII? Or using it as a PII tool? It sounds like actual tool you're proposing hasn't been developed yet.
 - a. KDADS: There is a draft form. What was previously created was just a form. Life Course has been talked about in relation to other projects. WSU will take all comments down for us and I will make sure that I pass that along to leadership.
 - b. Thank you. If you have any questions about it fell free to contact me and we can talk about how that might fulfill some of your needs if you're interested.
7. I want to make sure that I'm looking at the right policy. The one, I have is draft 4.25.2017 is that the right one?
 - a. KDADS: No, if you go to the KDADS home page and click the community services where it is blue, in the top paragraph there is a link that says for, "HCBS Programs and waiver renewal information." If your go to the left it says "HCBS Draft and final policies" click on that and that is where the updated version is.
 - b. What is the status date of the updated policy?
 - c. KDADS: 12.15.2017
8. I have a question about the new validation tool and attestation that is going to be coming out. Is there a timeline on that?
 - a. KDADS: We are in the process of finalizing the timeline and working through leadership here in terms of what we foresee as a goal of having the tool up and ready to go.
 - b. WSU: We are looking at training in late spring, early summer, and having the attestation period over the summer months, hopefully around May, but everything is still being finalized. The training and tool should be taking place as we get into the summer months.
9. You keep referencing leadership, which has to review and approve things. Can you give us positions and names of people included in your leadership?
 - a. KDADS: When I reference leadership I'm talking about Amy Penrod who I report to, she reports to Secretary Keck. KDHE single the payer Medicaid state agency and KDADS works in partnership with them as the state operating agency. Leadership comprises a broad spectrum of people, we are being very intentional about what we are doing, when we are doing it, and how we are doing it.
 - b. The reason I ask the question is that a lot of us have been around a long time and recognize names. I was curious who specifically, I was trying to pin point it down to individual people who I or others may be familiar with.
10. After a review of the other draft and looking through the 12.15.17 draft, are we going to standardize the integrated support plan and service authorizations? We're having a lot of issues with those lining up. How is that going to interconnect with this person centered service plan?

- a. KDADS: Do you think you can send me an email detailing the problems you are having with the alignment issues? So that we can understand what those problems are and how they might match up with this policy?
 - b. I certainly can do that. My guess my impression is that this will take over what the integrated support plan is doing is that correct?
 - c. KDADS: Yes, The aim is that it's going to replace the ISP and will encompass more than the ISP currently does.
 - d. Is it going to be standardized across MCOs?
 - e. Yes.
11. Under the person centered service planning it talks about it being once every 365 days unless there's a reason for it to happen an additional time. There's 6 reasons on page 3 and 4, one of the things I'm curious about and maybe it falls under post transition, for students that are in the 21 year old program it's not really included under post transitional but it specifically states, "state hospitals and nursing homes". Would that also be time for when a kiddo leaves school services and is in regular adult services? That might be a time for the team to meet and see if services are necessary or would that be considered a time when they need an additional meeting?
- a. KDADS: Anything requiring a change in scope, duration, or type of service, would require a meeting. That to me sounds like it would fall under those additional criteria.
12. Will providers be paid for attending those person centered service planning meetings?
- a. KDADS: As of now there is no method to pay those for those meetings. That's been brought up as a concern and it is something that we are looking at.
 - b. If we are not getting paid then we don't have to be there. I don't understand how is this going to work.
 - c. KDADS: That's that same comment that was brought up and we are looking into that.
13. I accidentally hung up on you. What was the answer for 18 to 21 year olds?
- a. KDADS: Anything that changes scope, duration, or service, is a reason to have another meeting. So if the services that someone is being provided in a school situation are not the same or are going to be provided in a different type of environment then that would be a part of that transition and they should have another meeting.
 - d. Maybe that should be listed under the post transition to be clear.
 - e. KDADS: Ok, we will consider that.
14. The person centered plan policy, is mentioning that the MCO's may use a subcontractor to facilitate PII completion, it differentiates that IDD waiver participants will have their PII facilitated by their assigned TCM. Does this mean that you still plan on TCM providers being a subcontractor of the MCO, and how are you mitigating that conflict of interest?
- a. I'm going to just take that comment as I'm not sure what we can speak to as there is an open RFP with the MCO's, and I don't want to violate procurement rules. I will take it back to leadership and we can tell you how we are going to answer that question.

Adjourn

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EVENING CALL (# PARTICIPANTS ON THE LINE, 15)

1. I was just wondering, why would we be pursuing a policy on the person centered support plan when we don't have all of the information from the gap analysis done? By going through all of the manuals, policies, regulations, and all of that, then we would be able to put together a policy for the person centered support plan.
 - a. WSU: They are looking at different things, WSU is looking at items for the settings requirements in the gap analysis. We are looking at the requirements as far as the HCBS settings where as the policy is looking at how the state is going to meet other requirements of the Final Rule. They're in the same plan but they're separate requirements for person centered service planning versus settings.
 - b. KDADS: The person centered service planning components are in the same rule but they are related to the requirements for waivers and one of the requirements for waivers is the conflict free person centered service plan that's been identified as an area that we will need to demonstrate compliance it has demonstrated it as an issue with one of the waivers already is in the same rule but different waivers and we've been working with this issue on the SED waiver.
 - c. KDADS: I'd like to make sure we get the comment recorded and conveyed back to Eva so she'll have it as part of her comments as we work on finalizing that policy.

Adjourn