

Colorado Milestone Template -- DRAFT

Background

In order to collect consistent information on the implementation of the HCB Settings criteria and Statewide Transition Plan (STP), CMS has identified a standard set of milestones to track across states. Since each state is different, the milestone must align with the Statewide Transition Plan (STP). States may provide more than one date for a particular milestone because the states will report completion in percentages, such as 25% or 50% complete. This approach will provide CMS and the state insight in regard to the status of completion pertaining to particular milestones.

Instructions and Reminders

The following milestone list provides the state the opportunity to track progress with implementation of the state's STP. Please provide and/or confirm dates for each milestone and where possible, the corresponding page number in the STP. Per the SOTA calls in 2016 and 2017, the state will receive email reminders 30 days prior to the due date of each milestone input into the system and when milestones are past due. States will also have the opportunity to update CMS on the milestones below through the HCB Settings website.

- All dates included in the template below should also align with the STP.
- The red italic text provides additional details related to each milestone. Please reach out to CMS with specific questions.
- Some milestones may have the same proposed due dates-as these steps may be undertaken simultaneously.
- States are encouraged to provide additional details on each milestone in the description column below. The description field will be transferred and available for viewing on the HCB Settings Website.

Milestone	Description	Proposed End Date	STP Page No.
Systemic Assessment and Remediation			
Completion of systemic assessment <i>[The date when overall completion of the systemic assessment, including review of all rules, regulations, and statutes]</i>	Review Colorado statutes, regulations, and waivers to determine whether these authorities are compliant with, silent on, or in conflict with the HCBS Settings requirements; prepare crosswalk summarizing this analysis and recommending any changes necessary to achieve compliance.	Completed 4/15/16	p. 10
Complete modifying rules and regulations, including provider manuals, inspection manuals, procedures, laws, qualification criteria, etc.	Prepare new/amended Departmental regulations and proposed amendments to waivers (using crosswalk as a roadmap); request that other affected agencies do the same for their regulations.	6/30/17	p. 12
Implementation of new rules and regulations: 50% complete <i>[The date when at least 50% of all rules, regulations, and statutes identified through the assessment will be implemented. Please specify which rules, regulations, and statutes in the description]</i>		Please complete	
Implementation of new rules and regulations: 100% complete <i>[The date when all rules, regulations, and statutes (100%) identified through the assessment will be implemented. Please specify which rules, regulations, and statutes in the description]</i>	Publicly notice and finalize new/amended Departmental regulations and proposed amendments to waivers (using crosswalk as a roadmap); request that other affected agencies do the same for their regulations.	7/31/17	p. 12
	Propose and finalize new/amended statutes (using crosswalk as a roadmap).	7/31/17	p. 12
Site-specific Assessments			
Completion of site-specific assessment <i>[The date when the overall completion of the site-specific assessment, including review of</i>	Conduct on-site surveys.	1/1/17	pp. 8-9

Milestone	Description	Proposed End Date	STP Page No.
<i>all settings and the validation of assessment results.]</i>			
Incorporate results of settings analysis into final version of the STP and release for public comment	Publicly notice final outcomes of site-specific assessments (including which providers will be put forward to CMS for heightened scrutiny).	12/31/17	pp. 9-10
Submit final STP to CMS	Submit updated STP with site-specific assessments to CMS (including which providers are being put forward for heightened scrutiny).	3/5/18	p. 10
Site-specific Remediation¹			
Completion of residential provider remediation: 25% <i>[The date when approximately 25% of residential providers have completed the necessary remediation (of those providers that require remediation). Please provide additional details on settings in the description.]</i>	Provider Transition Plans (PTPs) will be completed with all providers (including those not subject to site visits). PTPs will include determinations of whether providers are potentially subject to heightened scrutiny and whether they need to make any changes to attain compliance and/or to be put forward to CMS for heightened scrutiny.	1/1/17	p. 9
	Updated PTPs will be submitted, along with evidence supporting changes made by the provider to come into compliance.	12/31/17	p. 9
Completion of residential provider remediation: 50% <i>[The date when approximately 50% of residential providers have completed the necessary remediation (of those providers that require remediation). Please provide additional details on settings in the description.]</i>		Please complete	
Completion of residential provider remediation: 75% <i>[The date when approximately 75% of residential providers have completed the necessary remediation (of those providers</i>		Please complete	

Milestone	Description	Proposed End Date	STP Page No.
<i>that require remediation). Please provide additional details on settings in the description.]</i>			
Completion of residential provider remediation: 100% <i>[The date when all residential providers have completed the necessary remediation (of those providers that require remediation). Please provide additional details on settings in the description.]</i>		Please complete	
Completion of nonresidential provider remediation: 25% <i>[The date when approximately 25% of nonresidential providers have completed the necessary remediation (of those providers that require remediation). Please provide additional details on settings in the description.]</i>	Provider Transition Plans (PTPs) will be completed with all providers (including those not subject to site visits). PTPs will include determinations of whether providers are potentially subject to heightened scrutiny and whether they need to make any changes to attain compliance and/or to be put forward to CMS for heightened scrutiny.	1/1/17	p. 9
	Updated PTPs will be submitted, along with evidence supporting changes made by the provider to come into compliance.	12/31/17	p. 9
Completion of nonresidential provider remediation: 50% <i>[The date when approximately 50% of nonresidential providers have completed the necessary remediation (of those providers that require remediation). Please provide additional details on settings in the description.]</i>		Please complete	
Completion of nonresidential provider remediation: 75% <i>[The date when approximately 75% of nonresidential providers have completed the</i>		Please complete	

Milestone	Description	Proposed End Date	STP Page No.
<i>necessary remediation (of those providers that require remediation). Please provide additional details on settings in the description.]</i>			
Completion of nonresidential provider remediation: 100% <i>[The date when all nonresidential providers have completed the necessary remediation (of those providers that require remediation). Please provide additional details on settings in the description.]</i>		Please complete	
Identification of settings that will not remain in the HCBS System <i>[The date those settings that are considered institutional or are not willing to remediate will be identified for removal from the HCBS System]</i>	Determine whether each provider has made any required changes (including any necessary to be put forward to CMS for heightened scrutiny) or whether the provider needs to begin the process of transitioning clients from the impacted setting to another setting.	12/31/17	p. 9
Heightened Scrutiny²			
Identification of settings that overcome the presumption and will be submitted for heightened scrutiny and notification to provider	Determine whether each provider has made any required changes (including any necessary to be put forward to CMS for heightened scrutiny) or whether the provider needs to begin the process of transitioning clients from the impacted setting to another setting.	12/31/17	p. 9
Complete gathering information and evidence on settings requiring heightened scrutiny that it will present to CMS		Please complete	
Incorporate list of settings requiring heightened scrutiny and information and evidence referenced above into the final version of STP and release for public comment	Publicly notice final outcomes of site-specific assessments (including which providers will be put forward to CMS for heightened scrutiny).	12/31/17	pp. 9-10

Milestone	Description	Proposed End Date	STP Page No.
Submit STP with Heightened Scrutiny information to CMS for review	Submit updated STP with site-specific assessments to CMS (including which providers are being put forward for heightened scrutiny).	3/5/18	p. 10
Non-Compliant Settings			
Complete notifying member, guardians, case managers, facility support staff and any other identified responsible parties that the setting is not in compliance with HCBS settings requirements and that relocation or alternate funding sources need to be considered: 25% <i>[The date when members, guardians, case managers, etc. in approximately 25% of providers have been notified that relocation is required. Please provide additional details on settings in the description.]</i>		Please complete	
Complete notifying member, guardians, case managers, facility support staff and any other identified responsible parties that the setting is not in compliance with HCBS settings requirements and that relocation or alternate funding sources need to be considered: 50% <i>[The date when members, guardians, case managers, etc. in approximately 50% of providers have been notified that relocation is required. Please provide additional details on settings in the description.]</i>		Please complete	
Complete notifying member, guardians, case managers, facility support staff and any other identified responsible parties that the setting is not in compliance with HCBS		Please complete	

Milestone	Description	Proposed End Date	STP Page No.
settings requirements and that relocation or alternate funding sources need to be considered: 75% <i>[The date when members, guardians, case managers, etc. in approximately 75% of providers have been notified that relocation is required. Please provide additional details on settings in the description.]</i>			
Complete notifying member, guardians, case managers, facility support staff and any other identified responsible parties that the setting is not in compliance with HCBS settings requirements and that relocation or alternate funding sources need to be considered: 100% <i>[The date when members, guardians, case managers, etc. in all providers have been notified that relocation is required. Please provide additional details on settings in the description.]</i>		Please complete	
Complete beneficiary relocation or alternate funding across all providers: 25% <i>[The date when beneficiaries in approximately 25% of providers have been relocated. Please provide additional details on settings in the description.]</i>	Develop a process to support a stable transition for individuals to new settings as appropriate.	11/1/18	p. 10
Complete beneficiary relocation or alternate funding across all providers: 50% <i>[The date when beneficiaries in approximately 50% of providers have been relocated. Please provide additional details on settings in the description.]</i>		Please complete	

Milestone	Description	Proposed End Date	STP Page No.
Complete beneficiary relocation or alternate funding across all providers: 75% <i>[The date when beneficiaries in approximately 75% of providers have been relocated. Please provide additional details on settings in the description.]</i>		Please complete	
Complete beneficiary relocation or alternate funding across all providers: 100% <i>[The date when beneficiaries in all providers have been relocated. Please provide additional details on settings in the description.]</i>		Please complete	

¹This section includes only those providers where remediation was required.

²The first 3 Heightened Scrutiny milestones should be completed prior to resubmitting the STP to CMS (the fourth HS milestone).

Quarterly reporting: The following quarterly progress report milestones are optional. When initial approval is granted, states have the option of utilizing the quarterly report feature to track progress and provide updates to CMS through the milestone tracking system.

Milestone	Description	Proposed End Date	STP Page No.
Quarterly progress reporting updates			
Quarterly progress update <i>[First quarter after initial and final approval.]</i>			
Quarterly progress update <i>[Second quarter after initial and final approval.]</i>			
Quarterly progress update			

Milestone	Description	Proposed End Date	STP Page No.
<i>[Third quarter after initial and final approval.]</i>			
Quarterly progress update <i>[Fourth quarter after initial and final approval.]</i>			
Quarterly progress update <i>[Fifth quarter after initial and final approval.]</i>			
Quarterly progress update <i>[Sixth quarter after initial and final approval.]</i>			
Quarterly progress update <i>[Seventh quarter after initial and final approval.]</i>			

Please use the following section to provide any additional milestones for which the state would like to track or provide information to CMS. These milestones are optional; any listed milestones will be tracked in the CMS website and should reflect any major progress. More incremental progress does not have to be noted.

Milestone	Description	Proposed End Date	STP Page No.
Additional			
<i>Ongoing strategies to ensure compliance to rule, policy, procedure, and regulation changes.</i>			
<i>Provide assistance to providers to meet HCB setting requirements (e.g., technical assistance, focus groups, surveys, etc.).</i>			