

## Department of Disabilities, Aging and Independent Living (DAIL) Choices for Care HCBS Work Plan

This work plan is a partner to the State’s systemic assessment report *Choices for Care Managed Long-Term Services and Supports Self-Assessment of Person-Centered Planning and Home- and Community-Based Settings Policies* (Pacific Health Policy Group, October 27, 2015). The work plan contains proposed improvements or action steps recommended by the State that are intended to strengthen Vermont’s Choices for Care home and community-based services system. Proposed improvements/action steps are prioritized for Choices for Care home-based settings.

The primary lead for Choices for Care proposed improvements/actions steps rests with the Department of Disabilities, Aging and Independent Living (DAIL). All proposed improvements/actions steps are managed in collaboration with program stakeholders, the Vermont Agency of Human Services (AHS) and the Department of VT Health Access (DVHA) through the Global Commitment to Health, Comprehensive Quality Plan (CQP). *This work plan will commence in January 2016 with “Phase 1” and is anticipated to be complete by December 2016.*

### Phase 1 - Home-Based Settings: Adult Family Care (AFC) and Adult Day (AD) Settings

Regulation: Settings Requirements	Findings	Proposed Improvements/Action Steps
<b>#8. AFC Setting:</b> Units have entrance doors lockable by the individual, with only appropriate staff having keys to doors	AFC service plans and live-in agreements would benefit from more specific guidance regarding participant preferences and needs.  Standards for AD services are silent on visitors  #8, #10 and #11 are not applicable to AD since it is not a residential option.	a. DAIL will update the Choices for Care Program Manual, <b>Section IV.11 Adult Family Care</b> , to reflect regulatory requirements. <a href="http://ddas.vt.gov/ddas-policies/policies-cfc/policies-cfc-highest/section-iv-11-adult-family-care">http://ddas.vt.gov/ddas-policies/policies-cfc/policies-cfc-highest/section-iv-11-adult-family-care</a>  b. DAIL will update CFC <b>Agreement for Live-in Care</b> . <a href="http://ddas.vt.gov/ddas-programs/cfc-live-in-requirements">http://ddas.vt.gov/ddas-programs/cfc-live-in-requirements</a> .  c. DAIL will update AFC <b>Participant Rights</b> to reflect regulatory requirements.  d. DAIL will update the <b>Standards for Adult Day Services in Vermont</b> to address regulatory requirements. <a href="http://ddas.vt.gov/ddas-programs/ddas-policies/policies-adult-day/policies-adult-day">http://ddas.vt.gov/ddas-programs/ddas-policies/policies-adult-day/policies-adult-day</a>
<b>#10. AFC Setting:</b> Individuals have the freedom to furnish and decorate their sleeping or living units within the lease or other agreement		
<b>#11. AFC Setting:</b> Individuals have the freedom and support to control their own schedules and activities, and have access to food at any time.		
<b>#12. AFC &amp; AD Settings:</b> Individuals are able to have visitors of their choosing <i>at any time</i>		
<b>#14. AFC &amp; AD Settings:</b> Modification to HCBS Settings Requirements	AFC and AD provider documentation	

	requirements could be stronger regarding modifications to the settings requirements.	<a href="#">documents/standards-for-adult-day-services-vt.</a> e. DAIL will solicit stakeholder feedback on updated documents. f. DAIL will incorporate feedback into documents. g. DAIL will publish revised documents and distribute to stakeholders. h. DAIL will provide training and technical assistance to providers and stakeholders as needed. i. DAIL will provide a self-assessment tool to Adult Family Care and Adult Day providers. j. AHS, DAIL and DVHA will evaluate results of the provider self-assessment tools. k. DAIL will coordinate ASD quality activities with AHS and DVHA quality assurances under the Global Commitment Comprehensive Quality Plan (CQP).
<b>Regulation: Person-Centered Planning</b>	<b>Findings</b>	<b>Proposed Improvements/Action Steps</b>
<b>#3. HB &amp; AFC Settings:</b> Is timely, occurs at times and locations of convenience to the individual	Guidance discusses participant direction but does not specify time and location arrangements.	a. DAIL will update the Choices for Care Program Manual, <b>Section IV.1 Case Management Services</b> , to reflect regulatory requirements. <a href="http://ddas.vt.gov/ddas-policies/policies-cfc/policies-cfc-highest/section-iv-1-case-management-1">http://ddas.vt.gov/ddas-policies/policies-cfc/policies-cfc-highest/section-iv-1-case-management-1</a> .
<b>#10. HB &amp; AFC Settings:</b> Reflect that the setting in which the individual resides is chosen by the individual.	Documentation could be strengthened.	b. DAIL will update the Choices for Care Program Manual, <b>Section IV.11 Adult Family Care</b> , to reflect regulatory requirements. <a href="http://ddas.vt.gov/ddas-policies/policies-cfc/policies-cfc-highest/section-iv-11-adult-family-care">http://ddas.vt.gov/ddas-policies/policies-cfc/policies-cfc-highest/section-iv-11-adult-family-care</a>
<b>#14. HB &amp; AFC Settings:</b> (same as settings requirements) Modifications to Person-Centered Planning requirements.		c. DAIL will update <b>Case Management Standards and Certification Procedures</b> for more specificity.

		<p><a href="http://ddas.vt.gov/ddas-programs/programs-&lt;br/&gt;oaa/revised-case-management-standards">http://ddas.vt.gov/ddas-programs/programs- oaa/revised-case-management-standards</a>.</p> <ul style="list-style-type: none"><li>d. DAIL will solicit stakeholder feedback on updated documents.</li><li>e. DAIL will incorporate feedback into documents.</li><li>f. DAIL will publish revised documents and distribute to stakeholders.</li><li>g. DAIL will provide training and technical assistance to providers and stakeholders as needed.</li><li>h. DAIL will provide a self-assessment tool to Case Management and Adult Family Care providers.</li><li>i. DAIL, AHS and DVHA to evaluate results of the provider self-assessment tools.</li><li>j. Coordinate ASD quality activities with DVHA and AHS quality assurances under the Global Commitment Comprehensive Quality Plan (CQP).</li></ul>
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## Phase 2 - Non-home-based: Enhanced Residential Care (ERC) Setting

Regulation: Settings Requirements	Findings	Proposed Improvements/Action Steps
<p><b>#1 ERC Setting:</b> Commensurate with a persons individualized plan, needs and abilities - The setting is integrated in and supports full access to community, including opportunities to seek employment and work in competitive integrated settings, engage in community life, control personal resources, and receive services in the community, to the same degree of access as individuals not receiving HCBS</p>	<p>Due to nature of PNMI (Private Non-Medicaid Institution) and Licensing Standards some settings may be located on the grounds of private hospitals or nursing facilities.</p> <p>Residential Care Home Licensing Regulations are silent regarding lockable door requirements Residential Care Home Licensing regulations are silent regarding how roommates are assigned in semi-private situations</p>	<p>a. DAIL will solicit stakeholder feedback regarding whether to incorporate desirable HCBS features in ERC (PNMI) setting.</p> <p>b. AHS and DAIL will evaluate feedback and recommend next steps.</p> <p>c. Stakeholder feedback and recommendations from AHS and DAIL may lead to the following action steps:</p> <ul style="list-style-type: none"> <li>• Update <b>Residential Care Home</b> regulations. <a href="http://www.dail.vermont.gov/dail-statutes/statutes-dlp-documents/rch-licensing-regulations">http://www.dail.vermont.gov/dail-statutes/statutes-dlp-documents/rch-licensing-regulations</a>.</li> <li>• Update Choices for Care Program Manual, <b>Section IV.8 Enhanced Residential Care</b>. <a href="http://ddas.vt.gov/ddas-policies/policies-cfc/policies-cfc-highest/policies-cfc-highest-manual">http://ddas.vt.gov/ddas-policies/policies-cfc/policies-cfc-highest/policies-cfc-highest-manual</a></li> <li>• Solicit stakeholder feedback on revised documents/regulations.</li> <li>• Publish revised final documents/regulations.</li> <li>• Provide training and technical assistance providers as needed.</li> <li>• Provide a self-assessment tool to ERC providers.</li> <li>• AHS, DAIL and DVHA to evaluate results of the provider self-assessment tools.</li> </ul>
<p><b>#8 ERC Setting:</b> Units have entrance doors lockable by the individual, with only appropriate staff having keys to doors</p>	<p>Residential Care Home Licensing regulations are silent on the topic of furnishing and décor.</p>	
<p><b>#9. ERC Setting:</b> Individuals sharing units have a choice of roommates in that setting</p>	<p>Residential Care Homes offer meal plans and are required make options available as requested by participants. Regulations are silent on 24/7 access</p>	
<p><b>#10. ERC Setting:</b> Individuals have the freedom to furnish and decorate their sleeping or living units within the lease or other agreement</p>	<p>Residential Care Home Licensing regulations outline minimum standards (e.g., 8 am to 8 pm) not maximum</p>	
<p><b>#11. ERC Setting:</b> Individuals have the freedom and support to control their own schedules and activities, and have access to food at any time</p>		
<p><b>#12. ERC Setting:</b> Individuals are able to have visitors of their choosing <u>at any time</u></p>		

<p><b>#14. ERC Setting:</b> Modification to HCBS Settings Requirements</p>	<p>Documentation requirements could be stronger.</p>	<ul style="list-style-type: none"> <li>• Incorporate updates into regulatory and quality review and activities.</li> <li>• Coordinate ASD quality activities and DLP licensing activities with DVHA and AHS quality assurances under the Global Commitment Comprehensive Quality Plan (CQP).</li> </ul>
<p><b>Regulation: Person-Centered Planning</b></p>	<p><b>Findings</b></p>	<p><b>Proposed Improvements/Action Steps</b></p>
<p><b>#3. ERC Setting:</b> Is timely, occurs at times and locations of convenience to the individual.</p>	<p>Guidance discusses participant direction but does not specify time and location arrangements.</p>	<p><b>See above action steps.</b></p>
<p><b>#9. ERC Setting:</b> Records the alternative home- and community-based settings that were considered by the individual</p>	<p>Documentation could be strengthened (#9 and 10).</p>	
<p><b>#10. ERC Setting:</b> Reflect that the setting in which the individual resides is chosen by the individual.</p>		