

Home and Community-Based Services (HCBS) Settings Rule



Ensure the people you support are fully engaged and integrated into their communities. Create services to help achieve desired personal outcomes.

At Public Consulting Group (PCG), we know that success is defined by states helping individuals achieve their own desired outcomes. The new home and community-based services (HCBS) Settings Final Rule is designed to enhance the quality of HCBS programs, and to ensure that all citizens are fully engaged and integrated in their communities.

States play a leading role in this effort and we are here to support you. PCG is one of the only firms in the country to collaborate with numerous states in the development and implementation of statewide transition plans. We work side-by-side with states to conduct onsite assessments, develop heightened scrutiny packets, and build provider capacity. We have a unique understanding of individuals served and the rule's impact on states' HCBS programs.

PCG is helping multiple states evaluate provider practices to determine if they support the intent of the HCBS Settings Final Rule. We develop policy and waiver changes to incorporate person-centered planning, maximize community integration, and optimize autonomy and independence of individuals receiving support.

To improve provider capacity and compliance, PCG has created training modules that can be delivered in person or via webinar, including:

- The HCBS Final Rule
- Understanding Different Populations
- Individual's Rights
- Person-first Language
- Person-centered Thinking and Planning
- Active Listening Skills
- Interviewing Techniques
- Organizational Culture
- Creating Remediation Strategies and Work Plans
- Defining a Heightened Scrutiny Process
- Achieving Community Integration (LifeCourse framework)

We work with states to:

- Provide subject matter expertise in implementation of HCBS settings requirements for residential and non-residential settings.
- Develop provider tools, including communications, detailing HCBS settings requirements, provider self-assessments, and on-site compliance assessments.
- Evaluate provider self-assessments and supporting documentation for preliminary determinations of provider compliance.
- Create on-site verification tools for provider assessments.
- Conduct on-site assessments in residential and non-residential settings.
- Evaluate and report on the level of site compliance/non-compliance.
- Identify sites subject to Heightened Scrutiny and assist with preparation of evidentiary packets to submit Centers for Medicare and Medicaid Services (CMS).
- Present and communicate the HCBS settings assessment results to stakeholder groups to support the development of remediation plans.
- Create reports on HCBS settings' compliance for submission to CMS as part of the Statewide Transition Plan.

PCG supported several states with consultation, project management, and activities related to the HCBS Settings Final Rule and completion of their statewide transition plans.

Here are a few examples:

- **In Indiana**, PCG provided project management services for the HCBS Statewide Transition Plan, including coordinating the development of the transition plan, public comment periods, responses to public comments, and communications to stakeholder groups.

PCG worked with the Division of Aging to schedule and conduct site assessments of their residential settings, and developed remediation tools and stakeholder engagement materials for provider trainings.

With the Divisions of Disability and Rehabilitation Services, PCG assisted with assessment activities for the statewide transition plan. This included technical assistance for providers, creation of assessment tools, documentation reviews, and scheduling and conducting site assessments.

- **In Pennsylvania**, PCG assisted the Department of Human Services' Office of Developmental Programs with its Statewide Transition Plan implementation. PCG is developing HCBS final rule site-specific compliance assessments for residential and non-residential programs, and is also assisting with IT system changes to better document and support person-centered and employment-first practices.
- **In South Carolina**, PCG conducted site visits of over 1,100 HCBS residential and non-residential providers to assess compliance with the HCBS Settings rule.
- **In New York State**, PCG developed tools for reviewing HCBS settings, including adult day programs. Work included creation of provider surveys, remediation work plans, heightened scrutiny packets, and developing and conducting staff and provider trainings.

PCG developed and implemented various tools for assessing compliance with the HCBS Settings Final Rule, including:

- Non-residential and residential provider self-assessment surveys
- Provider documentation request surveys
- Non-residential and residential site assessment tools
- Provider remediation work plan template
- Heightened scrutiny summary sheet for evidentiary packages

Let us help your state to implement the HCBS Settings Final Rule today. Contact us today to learn more.

