

Historical Appendix 1g (formerly Appendix O-1) -- Summary of Public Comment

Com-ment #	Site	Type	Commenter	Theme	Theme Code	Key Comment	Medicaid Setting Rule to Which Comment Applies	Action/Revision to Implementation Plan
1	Peoria	Written	Adult Day Service Provider	Provider reimbursement rates may be barriers to compliance with portions of the CMS regulations	10	"Because of the low reimbursement rate for adult day services in Illinois, most adult day centers are operated by a parent organization and use of a part of another institution's space allows centers to stay open . . . " . . . Financial and time constraints prevent clients from having a wide choice of foods and dining times for a noon meal."	42 CFR 430 Chapter VII, Section 202 of the Unfunded Mandates Reform Act of 1195 (March 22, 1995, Pub. L. 104-4) and Federal Register Vol. 79 No. 11 Part II, first column, second comment and CMS response.	The State recognizes the relationship between reimbursement and the provider's willingness and ability to provide additional service options as envisioned by the regulations. The State intends to comply with the Transition Plan, recognizing reimbursement may need to be addressed on a separate track. State reimbursement for services is subject to the appropriations of our General Assembly.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	". . . Many centers, particularly in the Chicago area, are also culturally sensitive . . . Services in the language and culture of the countries of origin . . ." "Because all Illinois adult day centers serve persons with dementia, our centers do restrict freely leaving."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
2	Peoria	Written	Adult Day Service Provider	Provider reimbursement rates may be barriers to compliance with portions of the CMS regulations	10	"Because of the low reimbursement rate for adult day services in Illinois, most adult day centers are operated by a parent organization and use of a part of another institution's space allows centers to stay open . . . " . . . Financial and time constraints prevent clients from having a wide choice of foods and dining times for a noon meal."	42 CFR 430 Chapter VII, Section 202 of the Unfunded Mandates Reform Act of 1195 (March 22, 1995, Pub. L. 104-4) and Federal Register Vol. 79 No. 11 Part II, first column, second comment and CMS response.	The State recognizes the relationship between reimbursement and the provider's willingness and ability to provide additional service options as envisioned by the regulations. The State intends to comply with the Transition Plan, recognizing reimbursement may need to be addressed on a separate track. State reimbursement for services is subject to the appropriations of our General Assembly.

				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	" . . . Many centers, particularly in the Chicago area, are also culturally sensitive . . . Services in the language and culture of the countries of origin . . . " "Because all Illinois adult day centers serve persons with dementia, our centers do restrict freely leaving."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
3	Champaign	Written	Adult Day Service Provider	Provider reimbursement rates may be barriers to compliance with portions of the CMS regulations	10	"Because of the low reimbursement rate for adult day services in Illinois, most adult day centers are operated by a parent organization and use of a part of another institution's space allows centers to stay open . . . " " . . . Financial and time constraints prevent clients from having a wide choice of foods and dining times for a noon meal."	42 CFR 430 Chapter VII, Section 202 of the Unfunded Mandates Reform Act of 1195 (March 22, 1995, Pub, L. 104-4) and Federal Register Vol. 79 No. 11 Part II, first column, second comment and CMS response.	The State recognizes the relationship between reimbursement and the provider's willingness and ability to provide additional service options as envisioned by the regulations. The State intends to comply with the Transition Plan, recognizing reimbursement may need to be addressed on a separate track. State reimbursement for services is subject to the appropriations of our General Assembly.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	" . . . Many centers, particularly in the Chicago area, are also culturally sensitive . . . Services in the language and culture of the countries of origin . . . " "Because all Illinois adult day centers serve persons with dementia, our centers do restrict freely leaving."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
4	Champaign	Written	CIL Provider	Current Service Options/Definitions need to be reviewed and/or expanded under existing HCBS waivers and align with CMS regulations	4	" We hope waiver programs do continue to represent the best of services for people with disabilities and inclusion . . . "	441.304(d) - (f)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and the definitions of these services comport with the rules. Language in the Transition Plan has been added or modified to reflect these strategies.

5	Champaign	Written	AAA Director	Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	" . . .the needs and wants and preferences of older adults who would be utilizing an adult day center, but also the needs of the family caregivers because the adult day center are really extension of the family caregiver's experience . . ." " . . . How such a facility is perceived by the community when it makes its decision."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
6	Champaign	Written	Parent of a DD Participant	Current Service Options/Definitions need to be reviewed and/or expanded under existing HCBS waivers and align with CMS regulations	4	" . . . A lot of CILAs will require that you use their Day Program which would not be satisfactory . . . not wanting to lose all of his pay to an agency." " . . . transportation here, but that is really the biggest problem."	441.304(d) - (f)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and the definitions of these services comport with the rules. Language in the Transition Plan has been added or modified to reflect these strategies.
7	Champaign	Written	Provider Association	Provider reimbursement rates may be barriers to compliance with portions of the CMS regulations	10	"The reimbursement rate for adult day services is such that there are not adult day service chains with the exception of"	42 CFR 430 Chapter VII, Section 202 of the Unfunded Mandates Reform Act of 1195 (March 22, 1995, Pub, L. 104-4) and Federal Register Vol. 79 No. 11 Part II, first column, second comment and CMS response.	The State recognizes the relationship between reimbursement and the provider's willingness and ability to provide additional service options as envisioned by the regulations. The State intends to comply with the Transition Plan, recognizing reimbursement may need to be addressed on a separate track. State reimbursement for services is subject to the appropriations of our General Assembly.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"We also have a number of ethnic centers in Illinois and the people in the ethnic centers are often elderly who came here to be with their children . . . "" . . . If the standard were based just on geography, it would result in the tragic loss of adult day services for many people . . ." " . . . We also have a number of ethnic centers . . . Often elderly people who came here to be with their children . . ."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.

8	Champaign	Written	Provider Association	Process needs to be more defined regarding review of state statutes, policies and procedures to ensure compliance	7	"...it's really about looking at all of the current rules and deciding which ones need changes. One would be... Licensing for CILAs... Look towards integration... There's the interpretation of the rules which maybe where some of the challenges come. Often by the way people interpret DSP direct service provider requirements..."	441.304(d) - (f)	State will utilize existing stakeholder groups to help review state statutes, policies and procedures to ensure compliance. Language in the Transition Plan has been added or modified to reflect these strategies.
				Process needs to be strengthened in State oversight of HCBS Providers to ensure compliance	9	"... Bureau of Quality Management... Tend to look at things that are paperwork oriented as opposed to integration oriented..."	441.302	Over the next four years, all new and renewed waivers will be reviewed with a sensitivity to assure waiver assurances and performance measures comport with the HCBS rules. Language in the Transition Plan has been added or modified to reflect these strategies.
				Process needs to be strengthened in relationship to self-administered provider surveys and inclusion of participants and their Plans of Care	8	"I would love to see a requirement of input of self-advocates and family members in these rules changes just because it is the right thing to do."	441.304(d) - (f)	State intends to establish consumer focus groups during validation site visits. State plans to establish three levels of validation of provider survey results including visiting providers that demonstrated a high level of compliance. Validation site visits will be conducted by an independent third party. Language in the Transition Plan has been added or modified to reflect these strategies.
9	Champaign	Oral	CILA Provider	Timeframes identified in Statewide Transition Plan may not be realistic.	13	"I don't think your timeline going to be within the time that we've been asking because we're constantly told it takes a long time to change these rules."	441.301(c)(6)(B)	State plans to work with legal and policy representatives that represent all nine (9) of the HCBS Waivers to ensure process moves forward at a timely pace. Timeframes indicated in Transition Plan will continuously be reviewed.
10	Champaign	Oral	Adult Day Service Provider	Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"... We have always been associated with the nursing home. We have had a separate entrances." "(many examples re. value of program) "We stayed open on Black Friday and they were ecstatic that they go to go shopping."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.

11	Champaign	Oral	DD Provider	Current Service Options need to be reviewed and/or expanded under existing HCBS waivers and align with CMS regulations	4	" . . . Some of the work has already been done related to the 1115 would be of value . . . Fixing the 2 hour hold/24 hour CILA will end, unbundling transportation."	441.304(d) - (f)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and the definitions of these services comport with the rules. Language in the Transition Plan has been added or modified to reflect these strategies.
				Assurance of available service options to enable participant choice and integration in the greater community	1	" . . . Quite a bit of work has been done by DHS-DD looking at the CFCM . . . we really need to have a functional CFCM system in Illinois."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
12	Champaign	Oral	Parent of a DD Participant	Assurance of available service options to enable participant choice and access to the greater community	1	" . . . So what the focus needs to be on is how that agency is supporting access for that individual. . . . So I think we are talking about a person with a disability having choice in who's providing those services and supports. . . . Rules really do prohibit for day Programs . . . from doing anything that is community based . . . we want them to go out and have a job or job shadow, volunteer . . . "	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
13	Champaign	Oral	Parent of a DD Participant	General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	"How does this impact SODC's?"	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
14	Peoria	Oral	AAA Director	Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	" . . . We have an adult day care in a hospital"	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.

15	Peoria	Oral	Provider Association	Comments or questions in support of the HCBS Settings Rules	2	"We are pleased with the outcome based evidence that we're seeing in the Transition Plan."	N/A	No action to be taken.
				Provider reimbursement rates may be barriers to compliance with portions of the CMS regulations	10	". . . Many ADS are trying to stay in business and it is a lot tougher. . . Many campuses are with our parent organizations or with other organizations to keep our costs at a minimum. . . "	42 CFR 430 Chapter VII, Section 202 of the Unfunded Mandates Reform Act of 1195 (March 22, 1995, Pub, L. 104-4) and Federal Register Vol. 79 No. 11 Part II, first column, second comment and CMS response.	The State recognizes the relationship between reimbursement and the provider's willingness and ability to provide additional service options as envisioned by the regulations. The State intends to comply with the Transition Plan, recognizing reimbursement may need to be addressed on a separate track. State reimbursement for services is subject to the appropriations of our General Assembly.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	". . . Most of our clients that come to the ADS . . Have some sort of dementia."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
16	Peoria	Oral	Parent of a DD Participant	General comment or concern about the quality of a program and/or choice options	5	". . . There needs to be a program within the state programs to encourage the ability to get out and to actually be employed as opposed to doing maid work or just being occupied by just sitting in a chair."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
17	Peoria	Oral	Parent of a DD Participant	Comments or questions regarding issues not related to Transition Plan	3	Raised many concerns relating to confidentiality at a SODC, enrollment in managed care.	N/A	These represent questions or comments that do not appear to relate to HCBS settings rules and are not being addressed in the Transition Plan.

				General comment or concern about the quality of a program and/or choice options	5	Concern relating to Transition Plan dealt with day habilitation activities . . . "Activities need to have purpose and value."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
18	UIC	Written	Academic	Current Service Options need to be reviewed and/or expanded under existing HCBS waivers and align with CMS regulations	4	. . . Importance of the state supporting integrated behavioral health/mental health services in the community for people with intellectual and developmental disabilities."	441.304(d) - (f)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and the definitions of these services comport with the rules. Language in the Transition Plan has been added or modified to reflect these strategies.
19	UIC	Written	Adult Day Service Provider	Provider reimbursement rates may be barriers to compliance with portions of the CMS regulations	10	"Because of the low reimbursement rate for adult day services in Illinois, most adult day centers are operated by a parent organization and use of a part of another institution's space allows centers to stay open . . . " . . . Financial and time constraints prevent clients from having a wide choice of foods and dining times for a noon meal."	42 CFR 430 Chapter VII, Section 202 of the Unfunded Mandates Reform Act of 1195 (March 22, 1995, Pub, L. 104-4) and Federal Register Vol. 79 No. 11 Part II, first column, second comment and CMS response.	The State recognizes the relationship between reimbursement and the provider's willingness and ability to provide additional service options as envisioned by the regulations. The State intends to comply with the Transition Plan, recognizing reimbursement may need to be addressed on a separate track. State reimbursement for services is subject to the appropriations of our General Assembly.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	" . . . Many centers, particularly in the Chicago area, are also culturally sensitive . . . Services in the language and culture of the countries of origin . . . " "Because all Illinois adult day centers serve persons with dementia, our centers do restrict freely leaving."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
20	UIC	Written	Rehabilitation Provider	Comments or questions in support of the HCBS Settings Rules	2	" . . . Reflect a continuing commitment to the continuation of both supportive services and case management services for participants in the HCBS waivers."	N/A	No action to be taken.
				Comments or questions regarding issues not related to Transition Plan	3	"Lack of Notification of the change to Managed Care"	N/A	These represent questions or comments that do not appear to relate to HCBS settings rules and are not being addressed in the Transition Plan.

21	UIC	Written	CIL Provider	Assurance of available service options to enable participant choice and integration in the greater community	1	"PCP is a good sounding phrase unless there are provisions that guarantee that the consumer is listened to and his values, goals and desires are represented . . . Most people do not want to spend all their time at home, they need community and the community needs them.	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
				Comments or questions regarding issues not related to Transition Plan	3	". . . Managed care organizations need to understand the dignity of risk . . ."	N/A	These represent questions or comments that do not appear to relate to HCBS settings rules and are not being addressed in the Transition Plan.
				Current Service Options need to be reviewed and/or expanded under existing HCBS waivers and align with CMS regulations	4	"We support the continuation of the 1115 Waiver as it embraced many of these consents . . . Person Drive, Inclusive, Effective and Accountable, Coordinated and Transparent and Culturally Competent."	441.304(d) - (f)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and the definitions of these services comport with the rules. Language in the Transition Plan has been added or modified to reflect these strategies.
				Provider reimbursement rates may be barriers to compliance with portions of the CMS regulations	10	"It is nearly impossible to have a well-functioning system of LTSS if there are Medicaid cuts . . . An attack on the quality of life . . . Survival of people who rely on these services."	42 CFR 430 Chapter VII, Section 202 of the Unfunded Mandates Reform Act of 1195 (March 22, 1995, Pub. L. 104-4) and Federal Register Vol. 79 No. 11 Part II, first column, second comment and CMS response.	The State recognizes the relationship between reimbursement and the provider's willingness and ability to provide additional service options as envisioned by the regulations. The State intends to comply with the Transition Plan, recognizing reimbursement may need to be addressed on a separate track. State reimbursement for services is subject to the appropriations of our General Assembly.
22	Number skipped							
23	E-mail	Written	Family of a DD Participant	Assurance of available service options to enable participant choice and integration in the greater community	1	"He has been on an Emergency list with PUNS for six years now . . ."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.

24	E-mail	Written	Parent of a DD Participant	Current Service Options/Definitions need to be reviewed and/or expanded under existing HCBS waivers and align with CMS regulations	4	"Looking for . . . Financial support to caregivers of disabled individuals."	441.304(d) - (f)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and the definitions of these services comport with the rules. Language in the Transition Plan has been added or modified to reflect these strategies.
25	E-mail	Written	Adult Day Service Provider	Comments or questions regarding issues not related to Transition Plan	3	"It is not a good idea."	N/A	These represent questions or comments that do not appear to relate to HCBS settings rules and are not being addressed in the Transition Plan.
26	E-mail	Written	DD Transition Coordinator	General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	"Will State Operated Developmental Centers be required to complete the Statewide Transition Plan"	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
27	E-mail	Written	Unknown	Assurance of available service options to enable participant choice and integration in the greater community	1	"I hope that changes in the waiver help facilitate expansion of the program to include pulling more people off the state's PUNS waiting list."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
28	E-mail	Written	Parent of a DD Participant	Comments or questions regarding issues not related to Transition Plan	3	Several comments regarding the adequacy of SSI	N/A	These represent questions or comments that do not appear to relate to HCBS settings rules and are not being addressed in the Transition Plan.
29	E-mail	Written	Parent of a DD Participant	Current Service Options need to be reviewed and/or expanded under existing HCBS waivers and align with CMS regulations	4	Raised many concerns relating to "facilitating opportunities to seek employment in competitive settings, engage in community life . . . When neither the CILA agency nor the day program is not able to do this, due to lack of staff, funding." Question/Commented the definition of Person Centered Planning.	441.304(d) - (f)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and the definitions of these services comport with the rules. Language in the Transition Plan has been added or modified to reflect these strategies.

30	E-mail	Written	DD Association and Parent of DD Participant	Current Service Options/Definitions need to be reviewed and/or expanded under existing HCBS waivers and align with CMS regulations	4	"Majority of family with young adults with significant disabilities in our state find themselves with extremely limited options in terms of finding integrated, community-base and individualized supports." "Sending her there would amount to a form of exile for a person who cannot travel or communicate without extensive supports."	441.304(d) - (f)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and the definitions of these services comport with the rules. Language in the Transition Plan has been added or modified to reflect these strategies.
				General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	Provided detailed description of their participant/consumer's Plan of Care	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
31	E-mail	Written	Provider Association	Provider reimbursement rates may be barriers to compliance with portions of the CMS regulations	10	"Complete a cost analysis for the implementation of the proposed rule and the rule will be implemented only if the funding level approved by the legislature . . ."	42 CFR 430 Chapter VII, Section 202 of the Unfunded Mandates Reform Act of 1195 (March 22, 1995, Pub. L. 104-4) and Federal Register Vol. 79 No. 11 Part II, first column, second comment and CMS response.	The State recognizes the relationship between reimbursement and the provider's willingness and ability to provide additional service options as envisioned by the regulations. The State intends to comply with the Transition Plan, recognizing reimbursement may need to be addressed on a separate track. State reimbursement for services is subject to the appropriations of our General Assembly.
32	E-mail	Written	Advocate	Process needs to be strengthened in relationship to self-administered provider surveys and inclusion of participants	8	"Recipient of waiver services should be included in planned focus groups"	441.304(d) - (f)	State intends to establish consumer focus groups during validation site visits and review a sample of the participant's Plans of Care. State plans to establish three levels of validation of provider survey results including visiting providers that demonstrated a high level of compliance. Validation site visits will be conducted by an independent third party. Review of Plans of Care will aid in current and future development of Participant Plans of Care, but also may influence state statutes, policies and procedures. Language in the Transition Plan has been added or modified to reflect these strategies.

				General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	". . . Provider settings surveys . . . should be sent to this e-mail address . . ."	441.730(c)	Over 1800 surveys were returned to UIS researchers; State never indicated that individual results would be shared. However, continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
				Process needs to be more defined regarding review of state statutes, policies and procedures to ensure compliance	7	"Please mention how rules shared with waiver participants and family . . ."	441.304(d) - (f)	State will utilize existing stakeholder groups to help review state statutes, policies and procedures to ensure compliance. Language in the Transition Plan has been added or modified to reflect these strategies.
33	E-mail	Written	Parent of a DD Participant	Provider reimbursement rates may be barriers to compliance with portions of the CMS regulations	10	"It is no secret that Illinois has problems and most programs are underfunded ." Explains perceived difference between a program and a service. "Illinois could use better funding streams.	42 CFR 430 Chapter VII, Section 202 of the Unfunded Mandates Reform Act of 1195 (March 22, 1995, Pub, L. 104-4) and Federal Register Vol. 79 No. 11 Part II, first column, second comment and CMS response.	The state acknowledges the relationship of the reimbursement cost and ability to provide service. Funding is based upon budget allocations. With this in mind, the state intends to review existing HCBS Waiver service definitions to determine possible changes that could better align definitions with new CMS regulations. The state believes that many of the changes that will result from reviews can be done without additional funding. The state must comply with HCBS settings requirements and language in the Transition Plan has been added or modified to reflect these strategies.
				Current Service Options need to be reviewed and/or expanded under existing HCBS waivers and align with CMS regulations	4	". . The old way of funding day programs and housing has to become a thing of the past.	441.304(d) - (f)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and the definitions of these services comport with the rules. Language in the Transition Plan has been added or modified to reflect these strategies.

34	E-mail	Written	DD Provider	Provider reimbursement rates may be barriers to compliance with portions of the CMS regulations	10	"The system is woefully underfunded. The transition plan needs to address how process and outcome oriented changes will be financially supported."	42 CFR 430 Chapter VII, Section 202 of the Unfunded Mandates Reform Act of 1195 (March 22, 1995, Pub, L. 104-4) and Federal Register Vol. 79 No. 11 Part II, first column, second comment and CMS response.	The State recognizes the relationship between reimbursement and the provider's willingness and ability to provide additional service options as envisioned by the regulations. The State intends to comply with the Transition Plan, recognizing reimbursement may need to be addressed on a separate track. State reimbursement for services is subject to the appropriations of our General Assembly.
				Specific concern that implementation of Transition Plan could add additional burden to provider and responsible parties	12	"Please do not add another layer of monitoring . . ."	42 CFR 430 Chapter VIII. Section 202 of the Unfunded Mandates Reform Act of 1195 (March 22, 1995, Pub, L. 104-4)	State will utilize existing stakeholder groups to help review state statutes, policies and procedures to ensure compliance. HCBS Rules are in effect and state is responsible for their implementation. Language in the Transition Plan has been added or modified to reflect these strategies.
35	E-mail	Written	Provider Association	Comments or questions in support of the HCBS Settings Rules	2	" . . . Positive results of the UIS survey, the landscape of residential and non-residential setting compliance in Illinois is encouraging."	N/A	No action to be taken.
				Process needs to be strengthened in relationship to self-administered provider surveys and inclusion of participants and their Plans of Care	8	" . . . Process and outcome-oriented change may be necessary after the same of site visits is completed ... individual experience rather than one based on a setting's location, geography or physical characteristics."	441.304(d) - (f)	State intends to establish consumer focus groups during validation site visits and review a sample of the participant's Plans of Care. State plans to establish three levels of validation of provider survey results including visiting providers that demonstrated a high level of compliance. Validation site visits will be conducted by an independent third party. Review of Plans of Care will aid in current and future development of Participant Plans of Care, but also may influence state statutes, policies and procedures. Language in the Transition Plan has been added or modified to reflect these strategies.

				Provider reimbursement rates may be barriers to compliance with portions of the CMS regulations	10	" . . . Substantial funding for the training of existing and additional staff . . . No financial provision for these federally required changes."	42 CFR 430 Chapter VII, Section 202 of the Unfunded Mandates Reform Act of 1195 (March 22, 1995, Pub. L. 104-4) and Federal Register Vol. 79 No. 11 Part II, first column, second comment and CMS response.	The State recognizes the relationship between reimbursement and the provider's willingness and ability to provide additional service options as envisioned by the regulations. The State intends to comply with the Transition Plan, recognizing reimbursement may need to be addressed on a separate track. State reimbursement for services is subject to the appropriations of our General Assembly.
				Process needs to be strengthened in State oversight of HCBS Providers to ensure compliance	9	" . . . Using existing governing/monitoring bodies that have established practices and community relationships will maximize efficiency and resources . . . " "Division of Developmental Disabilities in the transition is essential and should be outlined in the plan explicitly."	441.302	Over the next four years, all new and renewed waivers will be reviewed with a sensitivity to assure waiver assurances and performance measures comport with the HCBS rules. Language in the Transition Plan has been added or modified to reflect these strategies.
36	Telephone	Oral	Parent of a DD Participant	General comment or concern about the quality of a program and/or choice options	5	"He used to live in an 8 bed CILA, but he was a higher level than everybody else so he got no attention. . . he was so bored, his behavior issues continued to worse."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
				Assurance of available service options to enable participant choice and integration in the greater community	1	"Why doesn't the government give the families some of the money so we can afford to take them places and do things with them?"	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.

37	Telephone	Oral	Provider	General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	"Do we have to allow overnight visitors whenever and for however long they want and to allow people to visit 24 hours a day?"	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
38	Frankfort	Written	Provider Association and Parent of DD Participant	Assurance of available service options to enable participant choice and integration in the greater community	1	"... There will need to be much broader access to community-based options that are approved for funding. . . HCBS currently provides very limited options for use of funding in the community. . . True integrated activities must be funded. . ."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
39	E-mail	Written	Provider Association	Assurance of available service options to enable participant choice and integration in the greater community	1	"... New definitions for consideration as an amendment to the Adult Home and Community-Based Waiver that will move IL towards compliance. They are: Individual and Residential Support Services and Supported, Individual and Customized Employment Services."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
				Comments or questions regarding issues not related to Transition Plan	3	"Ticket to Work Outcome and Milestone payments from SSA do not conflict with CMS regulatory requirements and do not constitute an overpayment of federal dollars for services provided since payments are made for an outcome, rather than for a Medicaid service rendered." List of service limitations included	N/A	No action to be taken.

40	Ina	Written	Parent of a DD Participant	Process needs to be strengthened in relationship to self-administered provider surveys and inclusion of participants and their Plans of Care	8	"I wish the Plan would equally emphasize consumer and family surveys as part of the data collection process."	441.304(d) - (f)	State intends to establish consumer focus groups during validation site visits and review a sample of the participant's Plans of Care. State plans to establish three levels of validation of provider survey results including visiting providers that demonstrated a high level of compliance. Validation site visits will be conducted by an independent third party. Review of Plans of Care will aid in current and future development of Participant Plans of Care, but also may influence state statutes, policies and procedures. Language in the Transition Plan has been added or modified to reflect these strategies.
				Current Service Options/Definitions need to be reviewed and/or expanded under existing HCBS waivers and align with CMS regulations	4	"It is important not to the term Person Centered Planning to become simply jargon."	441.304(d) - (f)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and the definitions of these services comport with the rules. Language in the Transition Plan has been added or modified to reflect these strategies.
				Assurance of available service options to enable participant choice and integration in the greater community	1	"I encourage you to revisit the community engagement and transportation opportunities at a consumer or individual level." "Many of the day trainings . . . Have the effect of isolating individuals receiving HCBS from the broader community."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
41	Ina	Oral	Participant	General comment or concern about the quality of a program and/or choice options	5	"They are tired of going to workshop and doing the same thing all day and getting paid piece work"	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.

42	Ina	Oral	Participant	Assurance of available service options to enable participant choice and integration in the greater community	1	"I was told if I had to move to CILA, I would have to quit my job and go to their workshop."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
43	Ina	Oral	Guardian	Specific concern that implementation of Transition Plan could add additional burden to provider and responsible parties	12	"Some of us don't want highly integrated for our person because of behavioral issues." Series of other questions relating to the rules.	42 CFR 430 Chapter VIII. Section 202 of the Unfunded Mandates Reform Act of 1195 (March 22, 1995, Pub. L. 104-4)	State will utilize existing stakeholder groups to help review state statutes, policies and procedures to ensure compliance. HCBS Rules are in effect and state is responsible for their implementation. Language in the Transition Plan has been added or modified to reflect these strategies.
44	Ina	Oral	Provider	Provider reimbursement rates may be barriers to compliance with portions of the CMS regulations	10	"This covers all of the waivers? Is there new funding for this? "With the woefully underfunded community system now it's pretty tough to create alternatives at this point unless they incentivize us."	42 CFR 430 Chapter VII, Section 202 of the Unfunded Mandates Reform Act of 1195 (March 22, 1995, Pub. L. 104-4) and Federal Register Vol. 79 No. 11 Part II, first column, second comment and CMS response.	The State recognizes the relationship between reimbursement and the provider's willingness and ability to provide additional service options as envisioned by the regulations. The State intends to comply with the Transition Plan, recognizing reimbursement may need to be addressed on a separate track. State reimbursement for services is subject to the appropriations of our General Assembly.
45	Ina	Oral	Provider	General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	"With the new administration change that's going to come in a couple of years in this course that is unalterable? . . . Understanding of the difference specifically we are now required to offer the choice of a private unit."	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.

				Assurance of available service options to enable participant choice and integration in the greater community	1	"How much are we supposed to pull choice out when the choice isn't there."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
46	Ina	Oral	Guardian	General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	"I think that (individual having whoever they want in planning meetings) will be something we will struggle with . . . Because if the individual says, I don't want my guardian . . ."	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
47	Ina	Oral	Provider	Assurance of available service options to enable participant choice and integration in the greater community	1	"As the regulations roll out it seems like a lot of interest and a lot questions people have are about what has to be documented in the plan." ". . . Right now our ISP is running about 25 pages long . . ."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
48	Ina	Oral	Provider	Process needs to be more defined regarding review of state statutes, policies and procedures to ensure compliance	7	"And really a lot of what you are talking about is normal practice for providers." "What I am hearing is that it will be heavy on documentation that I think there needs to be additional Q work created . . ."	441.304(d) - (f)	State will utilize existing stakeholder groups to help review state statutes, policies and procedures to ensure compliance. Language in the Transition Plan has been added or modified to reflect these strategies.
49	Ina	Oral	Provider	Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"In an effort to have service available, ADS have been placed on campuses and that they may appear to not meet the requirements. . . It's a day setting, they come to the Day Center to be some place safe and . . . Return to their own community."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.

50	Ina	Oral	Provider	General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	"As the plan falls is that looking like that to be the status quo or are they looking at the expectation that each provider also has to provide all of these options?" Other similar questions.	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
51	Ina	Oral	Guardian	General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	"So I guess, a person already living in their facility and says I want a private room I think . . . The issue would be the ISSA or whoever advocates for the person to force them to make a one bed or persons leaving their home to go to another place?"	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
52	Ina	Oral	Unknown	General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	"Are any of the 9 current waivers . . . Closer to the PCP than others?"	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
53	Ina	Oral	Provider	General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	"I think we started moving towards a PCP around the year 2000, I am not going to say we are all the way there . . ."	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
54	Ina	Oral	Provider	Comments or questions regarding issues not related to Transition Plan	3	"It is to a great degree; there are some parts of it, but it's not totally there, but it's pretty close" (Referencing IDoA's comprehensive assessment and plan of care)	N/A	These represent questions or comments that do not appear to relate to HCBS settings rules and are not being addressed in the Transition Plan.

55	Ina	Oral	Provider	Process needs to be more defined regarding review of state statutes, policies and procedures to ensure compliance	7	"On the PCP, I would go with . . . There needs to be a process where the choices are real and not just an assumption. Some people have very low cognitive abilities and it was highly offensive to me to get . . . Wanted these five people . . ."	441.304(d) - (f)	State will utilize existing stakeholder groups to help review state statutes, policies and procedures to ensure compliance. Language in the Transition Plan has been added or modified to reflect these strategies.
56	Ina	Oral	Participant	General comment or concern about the quality of a program and/or choice options	5	"They are tired of going to workshop and doing the same thing all day and getting paid piece work"	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
				Current Service Options/Definitions need to be reviewed and/or expanded under existing HCBS waivers and align with CMS regulations	4	". . . Can we make the PCP in an accommodating way to where if someone does have a low reading or understanding level that it would be easy enough for them to understand?"	441.304(d) - (f)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and the definitions of these services comport with the rules. Language in the Transition Plan has been added or modified to reflect these strategies.
57	Ina	Oral	Provider	Provider reimbursement rates may be barriers to compliance with portions of the CMS regulations	10	". . . Providers are concerned about resources needed to meet integrated employment and other choices. The rates are not set-up at all for anything that is individualized."	42 CFR 430 Chapter VII, Section 202 of the Unfunded Mandates Reform Act of 1195 (March 22, 1995, Pub, L. 104-4) and Federal Register Vol. 79 No. 11 Part II, first column, second comment and CMS response.	The State recognizes the relationship between reimbursement and the provider's willingness and ability to provide additional service options as envisioned by the regulations. The State intends to comply with the Transition Plan, recognizing reimbursement may need to be addressed on a separate track. State reimbursement for services is subject to the appropriations of our General Assembly.

58	Rockford	Oral	Parent of a DD Participant	Assurance of available service options to enable participant choice and integration in the greater community	1	" . . . Looking for a small CILA so eventually will impact us if there are every any openings in family as possible . . . You want to have places close to family."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
				General comment or concern about the quality of a program and/or choice options	5	Person raised an array of examples regarding use of technology, green industries and "cutting edge" practices.	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
59	E-mail	Written	Advocate	General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	"integrate may do more harm than good. General principles like integration and least restrictive environment are fine, but when they translate into specific rules like CILAs must be 4 beds or less or that CILA residents can't do day programs on a campus, then you have done harm." Commenter when on to cite an array of concerns and suggest that there be flexibility.	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
60	E-mail	Written	Parent of a DD Participant	General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	" . . . HCBS rules will have a devastating effect on the quality of life for many special needs adults living in group homes in IL. . . . I understand the rule changes being considered, the ability to house more than 4 residents in a single structure would be eliminated . . requirement that all homes be fully accessible sounds great at first, but a better approach is to invest the necessary money in the structures that are best suited for non-ambulatory residents . . Misericordia has spent decades creating an enterprise that challenges and supports the needs and abilities of its residents."	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.

61	E-mail	Written	Parent of a DD Participant	General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	" . . .it is important that IL not become more restrictive on its definitions of HCBS settings . . . Definition of home and community approved settings which we believe will have the impact of denying further choice for residents . . . We want the HCBS criteria to be outcome oriented and based upon the person's quality of life experiences . . . ADA, DD Bill of Rights, Omstead . . . have the human right and civil right to be supported in a setting of their choice and not forced into choosing from a more limited set of options. . . "	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
				General Comment Regarding Statewide Transition Plan Process	14	" . . Post all public comments as well as State summaries of public comments that will be sent to CMS to ensure accountability and transparency to stakeholders. "	I (a), paragraph 5	Illinois is required to meet the expectations of federal CMS in regards to the implementation of HCBS settings. language in the Transition Plan has been added or modified to reflect these strategies.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	" . . . Request that current homes fall under a grandfather clause . . ."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
62	E-mail	Written	Parent of a DD Participant	General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	" . . .it is important that IL not become more restrictive on its definitions of HCBS settings . . . Definition of home and community approved settings which we believe will have the impact of denying further choice for residents . . . We want the HCBS criteria to be outcome oriented and based upon the person's quality of life experiences . . . ADA, DD Bill of Rights, Omstead . . . have the human right and civil right to be supported in a setting of their choice and not forced into choosing from a more limited set of options. . . "	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
				General Comment Regarding Statewide Transition Plan Process	14	" . . Post all public comments as well as State summaries of public comments that will be sent to CMS to ensure accountability and transparency to stakeholders. "	I (a), paragraph 5	Illinois is required to meet the expectations of federal CMS in regards to the implementation of HCBS settings. language in the Transition Plan has been added or modified to reflect these strategies.

				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	" . . . Request that current homes fall under a grandfather clause . . . "	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
63	E-mail	Written	Parent of a DD Participant	General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	" . . .it is important that IL not become more restrictive on its definitions of HCBS settings . . . Definition of home and community approved settings which we believe will have the impact of denying further choice for residents . . . We want the HCBS criteria to be outcome oriented and based upon the person's quality of life experiences . . . ADA, DD Bill of Rights, Omstead . . . have the human right and civil right to be supported in a setting of their choice and not forced into choosing from a more limited set of options. . . "	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
				General Comment Regarding Statewide Transition Plan Process	14	" . . Post all public comments as well as State summaries of public comments that will be sent to CMS to ensure accountability and transparency to stakeholders. "	I (a), paragraph 5	Illinois is required to meet the expectations of federal CMS in regards to the implementation of HCBS settings. language in the Transition Plan has been added or modified to reflect these strategies.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	" . . . Request that current homes fall under a grandfather clause . . . "	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
64	E-mail	Written	Parent of a DD Participant	General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	" . . .it is important that IL not become more restrictive on its definitions of HCBS settings . . . Definition of home and community approved settings which we believe will have the impact of denying further choice for residents . . . We want the HCBS criteria to be outcome oriented and based upon the person's quality of life experiences . . . ADA, DD Bill of Rights, Omstead . . . have the human right and civil right to be supported in a setting of their	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.

						choice and not forced into choosing from a more limited set of options. . . "		
				General Comment Regarding Statewide Transition Plan Process	14	" . . Post all public comments as well as State summaries of public comments that will be sent to CMS to ensure accountability and transparency to stakeholders. "	I (a), paragraph 5	Illinois is required to meet the expectations of federal CMS in regards to the implementation of HCBS settings. language in the Transition Plan has been added or modified to reflect these strategies.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	" . . . Request that current homes fall under a grandfather clause . . . "	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
65	E-mail	Written	Parent of a DD Participant	Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	" . . . I have gotten to know a great many of these CILA residents over the years and it is inspiring to listen to their stories . . . "	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
66	E-mail	Written	Parent of a DD Participant	General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	" . . . I was warned by other parents that the people who would be making the biggest decisions about my daughter's life would be the people who had the least interactions with her."	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.

				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"I choose Misericordia because she could live in a CILA with ladies in her age group, with similar interests and enjoy life beyond walls of that house. Misericordia gave her more than a bed to sleep and a home to live. . . They are not stuck in a house in a neighborhood with nothing to do. That was the life she was living at home with me."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
67	E-mail	Written	Parent of a DD Participant	Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	Commenter made many positive statements about their son's provider, the community and opportunities for him including their feelings of being assured he will be taken care of after they are gone.	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
68	E-mail	Written	Parent of a DD Participant	General Comment Regarding Statewide Transition Plan and Processes	14	" . . . It is important that the state of IL does not become restrictive of the definition of HCBS settings"	I (a), paragraph 5	Illinois is required to meet the expectations of federal CMS in regards to the implementation of HCBS settings. Language in the Transition Plan has been added or modified to reflect these strategies.
				General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	"Restricting the number of residents in a CILA to four defines a home by size rather than considering the setting."	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"I ask that current facilities fall under a grandfather clause to reduce disruptions . . . Connections the residents have established which should be encouraged and protected."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.

69	E-mail	Written	Parent of a DD Participant	General Comment Regarding Statewide Transition Plan and Processes	14	"It is important that the state not become restrictive of the definition of HCBS settings."	I (a), paragraph 5	Illinois is required to meet the expectations of federal CMS in regards to the implementation of HCBS settings. Language in the Transition Plan has been added or modified to reflect these strategies.
				General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	"Restricting the number of residents in a CILA to four defines a home by size rather than considering the setting." "Making Misericordia physically accessible even though none of its residents have ambulatory needs seems an unnecessary expense."	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	". . . Current facilities fall under a grandfather clause to reduce disruption and protect existing relationships . . ."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
70	E-mail	Written	Parent of a DD Participant	Assurance of available service options to enable participant choice and integration in the greater community	1	"I believe firmly in the rights of all citizens-- disabled or not -- to have choices about workplaces and home settings. Any new initiatives that offer more choice and more options welcome, but those that are created at the expense of existing, quality services are not."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"I am well aware of the tension between other advocates in the disability community and many of us who consider ourselves to be blessed to be a member of such a community as Misericordia"	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.

				General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	" . . . Nobody can find any evidence or reasoning behind what seems to be the arbitrary limit being proposed of four individuals or less."	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
71	E-mail	Written	Parent of a DD Participant	Current Service Options/Definitions need to be reviewed and/or expanded under existing HCBS waivers and align with CMS regulations	4	"It is important that Illinois not become more restrictive on its definitions of HCBS settings . . . One sides does not fit all . . ."	441.304(d) - (f)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and the definitions of these services comport with the rules. Language in the Transition Plan has been added or modified to reflect these strategies.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	" . . . Settings like the one we have at Misericordia to be considered appropriate to meet HCBS criteria which we believe further increases for people with developmental disabilities." "As protected by the ADA, Developmental Disabilities Bill of Rights and the Olmstead Decision, individuals with disabilities have the human right and civil right to be supported in a setting of their choice . . ."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
				General Comment Regarding Statewide Transition Plan and Processes	14	"I hope that Illinois post all public comments as well as State summaries of public comments that will be sent to CMS to ensure accountability and transparency . . ."	I (a), paragraph 5	Illinois is required to meet the expectations of federal CMS in regards to the implementation of HCBS settings. Language in the Transition Plan has been added or modified to reflect these strategies.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	" . . . Request that current homes fall under a grandfather clause . . ."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.

72	E-mail	Written	Parent of a DD Participant	Current Service Options/Definitions need to be reviewed and/or expanded under existing HCBS waivers and align with CMS regulations	4	" . . . One size does not fit all models would compromise the quality. . ."	441.304(d) - (f)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and the definitions of these services comport with the rules. Language in the Transition Plan has been added or modified to reflect these strategies.
				Assurance of available service options to enable participant choice and integration in the greater community	1	"We appreciate the civil rights protections that individuals with disabilities enjoy, and oppose any policy that would seek to erode individual choice."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
				General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	" . . . We would like you to reconsider the condition that all settings become physically accessible."	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	" . . . Ask that current homes are afforded the grandfather clause on issues under consideration that would affect their lives."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
73	E-mail	Written	Parent of a DD Participant	Current Service Options/Definitions need to be reviewed and/or expanded under existing HCBS waivers and align with CMS regulations	4	" . . . Like to make it clear that Illinois not become more restrictive on its definition of HCBS services." " . . . Definition of home and community approved settings which we believe will have the impact of denying further choice for the residents."	441.304(d) - (f)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and the definitions of these services comport with the rules. Language in the Transition Plan has been added or modified to reflect these strategies.

				Process needs to be more defined regarding review of state statutes, policies and procedures to ensure compliance	7	"We want the HCBS criteria to be outcome oriented and based upon the person's quality of life experiences."	441.304(d) - (f)	State will utilize existing stakeholder groups to help review state statutes, policies and procedures to ensure compliance. Language in the Transition Plan has been added or modified to reflect these strategies.
				Assurance of available service options to enable participant choice and integration in the greater community	1	"We also want Campus settings like the one we have at Misericordia to be considered appropriate to meet HCBS criteria which we believe further increases choice . . . "	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	" . . . The ADA, Developmental Disabilities Bill of Rights and the Olmstead Decision, individuals with disabilities have the human right and civil right to be supported in a setting of their choice and not forced into choosing from a more limited set of options."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
				General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	" . . . Settings be physically accessible be implemented only when there is a need."	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
				General Comment Regarding Statewide Transition Plan and Processes	14	" . . . Post all public comments as well as State summaries of public comments that will be sent to CMS to ensure accountability and transparency. . . "	I (a), paragraph 5	Illinois is required to meet the expectations of federal CMS in regards to the implementation of HCBS settings. Language in the Transition Plan has been added or modified to reflect these strategies.

				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	" . . . Current facilities fall under a grandfather clause to reduce the disruption . . ."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
74	E-mail	Written	Family of a DD Participant	Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	" . . . My 20 years of involvement with Misericordia made me very comfortable in asserting, as strongly as can be said, that Misericordia has a remarkable ability to provide for the needs of handicapped persons." "CILA residents must not be excluded from daily participation in the rich opportunities the Misericordia campus provides them." " . . . Rules impacting Misericordia current operations are made, they should be prospective only."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
				General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	" . . . Proposed rules contemplate limited the size of CILA" " . . . CILA residents who are deemed to employable in commercial settings be required to get a regular job." " . . . An inflexible mandate to build accommodations for persons with ambulatory needs into every CILA."	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
75	E-mail	Written	Family of a DD Participant	Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	Many personal supportive statements describing the campus community to be an integrated setting.	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.

				General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	" The proposed regulation limiting the population of an independent living home to four residents arbitrarily would affect both the economics of operating such facilities"	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
				Process needs to be more defined regarding review of state statutes, policies and procedures to ensure compliance	7	"As you create regulations, please consider the funds that would be necessary to retrofit existing structures to full ADA compliance are funds that would be unavailable for care. . . . Please grandfather existing facilities such as Misericordia."	441.304(d) - (f)	State will utilize existing stakeholder groups to help review state statutes, policies and procedures to ensure compliance. Language in the Transition Plan has been added or modified to reflect these strategies.
				Assurance of available service options to enable participant choice and integration in the greater community	1	"Individuals must have the dignity of choices that meet their needs. Please do not implement rules that reduce the flexibility of campus-based communities to service each person according to his/her best life choices."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
				Current Service Options/Definitions need to be reviewed and/or expanded under existing HCBS waivers and align with CMS regulations	4	"What is important is outcomes, not arbitrary metrics and one-size-all compliance."	441.304(d) - (f)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
				General Comment Regarding Statewide Transition Plan and Processes	14	"Please make these comments, and all comments, public."	I (a), paragraph 5	Illinois is required to meet the expectations of federal CMS in regards to the implementation of HCBS settings. Language in the Transition Plan has been added or modified to reflect these strategies.

76	E-mail	Written	Family of a DD Participant	Current Service Options/Definitions need to be reviewed and/or expanded under existing HCBS waivers and align with CMS regulations	4	"The State should not become more restrictive in its definition of home and community approved settings."	441.304(d) - (f)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and the definitions of these services comport with the rules. Language in the Transition Plan has been added or modified to reflect these strategies.
				General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	"CILAs should not be mandated to limits of only four people or less." . . . All settings be physically accessible should be implemented only when there is a practical need in a given setting. Existing homes with full ambulatory residents should be exempted when no need exists."	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
				Assurance of available service options to enable participant choice and integration in the greater community	1	"Individuals with disabilities should have the right to multiple choices of activities and workplaces."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"Campus settings in concern with CILAs, like Misericordia with ICF-DDs, CCIs and CLF and SNF/Ped should be considered appropriate to meet HCBS criteria."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
				Comments or questions regarding issues not related to Transition Plan	3	"ICF-DDs are not bad institutions, they are homes."	N/A	These represent questions or comments that do not appear to relate to HCBS settings rules and are not being addressed in the Transition Plan.

				Current Service Options/Definitions need to be reviewed and/or expanded under existing HCBS waivers and align with CMS regulations	4	"HCBS criteria and assessments should be outcome oriented."	441.304(d) - (f)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and the definitions of these services comport with the rules. Language in the Transition Plan has been added or modified to reflect these strategies.
				General Comment Regarding Statewide Transition Plan and Processes	14	". . . State summaries of public comments that will be sent to CMS to ensure accountability and transparency to stakeholders."	I (a), paragraph 5	Illinois is required to meet the expectations of federal CMS in regards to the implementation of HCBS settings. Language in the Transition Plan has been added or modified to reflect these strategies.
77	E-mail	Written	Family of a DD Participant	General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	". . . I would hate to see any changes made to CLA regulations that would limit the number of residents in a house."	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
				Process needs to be more defined regarding review of state statutes, policies and procedures to ensure compliance	7	". . . The cost of adding ramps to houses that don't really have a resident with that need is another expense that I see as wasteful."	441.304(d) - (f)	State will utilize existing stakeholder groups to help review state statutes, policies and procedures to ensure compliance. Language in the Transition Plan has been added or modified to reflect these strategies.
				Current Service Options/Definitions need to be reviewed and/or expanded under existing HCBS waivers and align with CMS regulations	4	"Please do not become more restrictive to the definition of home and community."	441.304(d) - (f)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and the definitions of these services comport with the rules. Language in the Transition Plan has been added or modified to reflect these strategies.

				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	Many personal supportive statements describing the campus community to be an integrated setting.	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
78	E-mail	Written	Family of a DD Participant	General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	" . . . Untenable burden on our CILA homes. . . . The new rules say we could only have 4"	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
				Process needs to be more defined regarding review of state statutes, policies and procedures to ensure compliance	7	"If you would like more feedback or participation in formulating the new rules, I encourage you to involve the Misericordia community."	441.304(d) - (f)	State will utilize existing stakeholder groups to help review state statutes, policies and procedures to ensure compliance. Language in the Transition Plan has been added or modified to reflect these strategies.
79	E-mail	Written	Family of a DD Participant	General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	"Limited the number of residents in a home to 4 or less." "Forcing all homes to be physically accessible by individuals with physical disabilities"	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
				Assurance of available service options to enable participant choice and integration in the greater community	1	"Forcing residents of assisted living housing to integrate with the common workforce."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.

80	E-mail	Written	Family of a DD Participant	General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	"We understand that a number of proposals are under consideration. One . . . Limitation of four persons per CILA, This seems arbitrary."	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
				Assurance of available service options to enable participant choice and integration in the greater community	1	"Expanding employment is desirable, campus opportunities should not be sacrificed. Outside employment is very difficult to find."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
				Process needs to be more defined regarding review of state statutes, policies and procedures to ensure compliance	7	"CILAs should only be required to be physically accessible only if such access is needed by residents."	441.304(d) - (f)	State will utilize existing stakeholder groups to help review state statutes, policies and procedures to ensure compliance. Language in the Transition Plan has been added or modified to reflect these strategies.
				General Comment Regarding Statewide Transition Plan and Processes	14	"We think that all comments received should be publically posted so that the inputs can be fully understood."	l (a), paragraph 5	Illinois is required to meet the expectations of federal CMS in regards to the implementation of HCBS settings. Language in the Transition Plan has been added or modified to reflect these strategies.
				Comments or questions regarding issues not related to Transition Plan	3	"ICF-DD are acceptable choice."	N/A	These represent questions or comments that do not appear to relate to HCBS settings rules and are not being addressed in the Transition Plan.

				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	". . . Existing rules should be grandfathered into the system."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
81	E-mail	Written	Family of a DD Participant	Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"We also want campus settings like the one we have at Misericordia to be considered appropriate to meet IL HCBS criteria which we believe further increases choice . . . " "Please consider that current homes and residents fall under a grandfather clause to reduce the disruption . . . residents have established relationships and connections to their internal and external communities. . . "	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
82	E-mail	Written	Guardian	General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	"CILAs should not be limited to 4 people."	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
				Assurance of available service options to enable participant choice and integration in the greater community	1	". . . . Should not be forced to integrate into the workplace at this time in her life as she now has early onset Alzheimer's." "Individuals with disabilities must have an array of choices for support options, settings and opportunities for the changing needs of their lifespan."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.

				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	". . . Existing services should be grandfathered and 8 person CILA's should be allowed to exist."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
83	E-mail	Written	Parent of a DD Participant	Current Service Options/Definitions need to be reviewed and/or expanded under existing HCBS waivers and align with CMS regulations	4	"The definition of home and community should not be based on physical characteristics, but on the quality of life of its residents."	441.304(d) - (f)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and the definitions of these services comport with the rules. Language in the Transition Plan has been added or modified to reflect these strategies.
				General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	". . . An existing CILA should not have to closed or reduced in size but should be grandfathered in whatever the new rules are."	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
				General Comment Regarding Statewide Transition Plan and Processes	14	" It is our hope that Illinois will post all public comments as well as State summaries of public comments that will be sent to CMS to ensure accountability and transparency to stakeholders."	I (a), paragraph 5	Illinois is required to meet the expectations of federal CMS in regards to the implementation of HCBS settings. Language in the Transition Plan has been added or modified to reflect these strategies.
84	E-mail	Written	Parent of a DD Participant	General comment or question regarding HCBS settings rules and need to be addressed through continuing education	4	"CILAs to 4 people would be tragic. Four may be fine for some, but eight is great for others." "Rather than retrofitting our daughter's CILA for special physical accessibility when there is no concrete need now, let it be done appropriately as needed."	441.304(d) - (f)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and the definitions of these services comport with the rules. Language in the Transition Plan has been added or modified to reflect these strategies.

				Assurance of available service options to enable participant choice and integration in the greater community	1	" . . . A narrow range of employment options or definition of community shouldn't exclude the meaningful, immensely satisfying and appropriate work our daughter does on campus at Misericordia" "We urge that individuals with disabilities be given as much choice as possible so that, in consultation with those they love, they can choose what is most helpful for them as individuals."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
85	E-mail	Written	Parent of a DD Participant	General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	"We understand that a number of proposals are under consideration. One . . . Limitation of four persons per CILA, This seems arbitrary."	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
				Assurance of available service options to enable participant choice and integration in the greater community	1	"We believe our residents should be able to keep existing campus opportunities."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
				Process needs to be more defined regarding review of state statutes, policies and procedures to ensure compliance	7	"We would like to see the condition that all settings be physically accessible be implemented only when there is a need." "We want the HCBS criteria to be based on quality of life experience."	441.304(d) - (f)	State will utilize existing stakeholder groups to help review state statutes, policies and procedures to ensure compliance. Language in the Transition Plan has been added or modified to reflect these strategies.
				General Comment Regarding Statewide Transition Plan and Processes	14	" . . . Our hope would be that IL post all public comments as well as State summaries of public comments . . . To ensure accountability and transparency . . ."	I (a), paragraph 5	Illinois is required to meet the expectations of federal CMS in regards to the implementation of HCBS settings. Language in the Transition Plan has been added or modified to reflect these strategies.

86	E-mail	Written	Friend of a DD Participant	Assurance of available service options to enable participant choice and integration in the greater community	1	" . . . To find appropriate employment assumes a level of sophistication and awareness on the part of employers that is unreasonable in a favorable employment client, let alone the one that so many without disabilities find challenging today.	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"We trust you take . . . Into consideration and look closely at models of success, care and love in places like Misericordia operate . . . "	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site visits to validate and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
87	E-mail	Written	Family of a DD Participant	General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	"CILAs should not be limited to 4 people."	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"Many organizations currently operating CILAs have created community participation. The residents are provided the support they need to access the off campus world for activities and events." " . . . Please do not punish the existing programs which are providing an excellent quality of life and rewarding work experience."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.

				Comments or questions regarding issues not related to Transition Plan	3	"ICF--DDs are not institutions"	N/A	These represent questions or comments that do not appear to relate to HCBS settings rules and are not being addressed in the Transition Plan.
				Assurance of available service options to enable participant choice and integration in the greater community	1	"Employment in the market place is woefully unwelcoming to this group of people. . . . In a CILA are not all the same and to assume they will all manage a job in the market place is wrong."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
88	E-mail	Written	Family of a DD Participant	Assurance of available service options to enable participant choice and integration in the greater community	1	". . . We do not want the State to become more restrictive in its definition of home and community approved settings which we believe will have the impact of denying choice. . . ."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
				Current Service Options/Definitions need to be reviewed and/or expanded under existing HCBS waivers and align with CMS regulations	4	"We want the HCBS criteria to be outcome oriented and based upon the person's quality of life . . ."	441.304(d) - (f)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and the definitions of these services comport with the rules. Language in the Transition Plan has been added or modified to reflect these strategies.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	". . . Campus settings like the one we have at Misericordia to be considered appropriate to meet HCBS criteria which we believe further increases choice for people . . ."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.

				Assurance of available service options to enable participant choice and integration in the greater community	1	"ICF-DD is a perfect option for my daughter."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
				General Comment Regarding Statewide Transition Plan and Processes	14	" . . Post all public comments as well as State summaries of public comments that will be sent to CMS to ensure accountability and transparency to stakeholders. "	I (a), paragraph 5	Illinois is required to meet the expectations of federal CMS in regards to the implementation of HCBS settings. Language in the Transition Plan has been added or modified to reflect these strategies.
89	E-mail	Written	DD Provider	Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	" . . . Definition of HCBS settings is based on individual experience and outcomes, rather than one based on setting's locations, geography or physical characteristics."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
				Provider reimbursement rates may be barriers to compliance with portions of the CMS regulations	10	" . . . Meaningful changes will require both initial start-up and ongoing financial support for remediation in order to effectively maintain the integrity of the new HCBS regulations."	42 CFR 430 Chapter VII, Section 202 of the Unfunded Mandates Reform Act of 1195 (March 22, 1995, Pub, L. 104-4) and Federal Register Vol. 79 No. 11 Part II, first column, second comment and CMS response.	The State recognizes the relationship between reimbursement and the provider's willingness and ability to provide additional service options as envisioned by the regulations. The State intends to comply with the Transition Plan, recognizing reimbursement may need to be addressed on a separate track. State reimbursement for services is subject to the appropriations of our General Assembly.

				General Comment Regarding Statewide Transition Plan and Processes	14	" . . .using existing governing/monitoring bodies that have established practices and community relationships . . . Input and involvement from the DDD in the transition is essential and should be outlined in the place explicitly."	I (a), paragraph 5	Illinois is required to meet the expectations of federal CMS in regards to the implementation of HCBS settings. Language in the Transition Plan has been added or modified to reflect these strategies.
90	E-mail	Written	Family of a DD Participant	General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	" . . . Having fewer residents at his CILA would not make it easier for him and will make it difficult for the residents to have the feeling of family . . ." "Arbitrarily reducing the number of residents in a CILA also becomes expensive for Misericordia and all others that care and support . . ." "Adding handicapped accessible improvements to every CILA when they are not needed is a waste of everyone's money."	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
				Assurance of available service options to enable participant choice and integration in the greater community	1	" . . . Existing campus opportunities should not be sacrifice, but rather should be offered as an addition to present programs." "Individuals with disabilities have the right to multiple choices of workplaces."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.

				Current Service Options/Definitions need to be reviewed and/or expanded under existing HCBS waivers and align with CMS regulations	4	"The definition of home and community should not be based on physical characteristics, but on the quality of life afforded its residents."	441.304(d) - (f)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and the definitions of these services comport with the rules. Language in the Transition Plan has been added or modified to reflect these strategies.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"Misericordia is already a community within a community." . . . I believe it would be fair to all involved, mostly the residents, that the HFS State Transition Planning Team consider grandfathering in existing services."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
				Comments or questions regarding issues not related to Transition Plan	3	"On the point of ICF-DDs, they are perfectly acceptable choice."	N/A	These represent questions or comments that do not appear to relate to HCBS settings rules and are not being addressed in the Transition Plan.
91	E-mail	Written	Family of a DD Participant	Current Service Options/Definitions need to be reviewed and/or expanded under existing HCBS waivers and align with CMS regulations	4	". . . we do not want the state to be more restrictive in its definition of home and community approved settings which we believe will have the impact of denying further choice for the residents."	441.304(d) - (f)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and the definitions of these services comport with the rules. Language in the Transition Plan has been added or modified to reflect these strategies.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"We also want Campus settings like the one we have at Misericordia to be considered appropriate to meet HCBS criteria which we believe further increases choice . . ."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.

				Process needs to be more defined regarding review of state statutes, policies and procedures to ensure compliance	7	" . . . The ADA, Developmental Disabilities Bill of Rights and the Olmstead Decision, individuals with disabilities have the human right and civil right to be supported in a setting of their choice and not forced into choosing from a more limited set of options."	441.304(d) - (f)	State will utilize existing stakeholder groups to help review state statutes, policies and procedures to ensure compliance. Language in the Transition Plan has been added or modified to reflect these strategies.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	" . . . All settings be physically accessible be implemented only when there is a need."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
				General Comment Regarding Statewide Transition Plan and Processes	14	" . . . IL should post all public comments as well as State summaries of public comments that will be sent to CMS to assure accountability and transparency. . ."	I (a), paragraph 5	Illinois is required to meet the expectations of federal CMS in regards to the implementation of HCBS settings. Language in the Transition Plan has been added or modified to reflect these strategies.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	" . . . Current homes fall under a grandfather clause to reduce the disruption to the individuals that reside in those homes. "	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
92	E-mail	Written	Academic	Current Service Options/Definitions need to be reviewed and/or expanded under existing HCBS waivers and align with CMS regulations	4	"Placement is more encompassing word than setting. Setting means the surrounding , the background only. Placement means one has put in a proper position or situation. . . Considering the totality of the placement, the appropriateness and meaningfulness of the placement for the individual."	441.304(d) - (f)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and the definitions of these services comport with the rules. Language in the Transition Plan has been added or modified to reflect these strategies.

				General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	" . . Numerical formulas, or quantitative constructs, 4 per setting, versus 7-8 per setting, shouldn't drive decisions concerning living arrangements."	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"The paternalistic attitudes of those insistent groups are lost to them. Claiming to know what's best for each and every CILA resident, excluding the voices of the residents' parents, they wave a flag of independence on behalf of CILA residents."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
93	E-mail	Written	Family of a DD Participant	General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	"The number of people who live in a CILA should not be limited to 4, which is very arbitrary number."All CILAs should not have to be physically accessible, only if it is actually needed."	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"We feel our campus is a community, and our residents the life line of it."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.

				Process needs to be more defined regarding review of state statutes, policies and procedures to ensure compliance	7	"if rules should be grandfather in, to existing CILAs in place at the time of these rules change."	441.304(d) - (f)	State will utilize existing stakeholder groups to help review state statutes, policies and procedures to ensure compliance. Language in the Transition Plan has been added or modified to reflect these strategies.
94	E-mail	Written	Family of a DD Participant	Current Service Options/Definitions need to be reviewed and/or expanded under existing HCBS waivers and align with CMS regulations	4	"It is critical that Illinois not become more restrictive on its definitions of HCBS settings. . . . Keep open the definition of home and community approved settings."	441.304(d) - (f)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and the definitions of these services comport with the rules. Language in the Transition Plan has been added or modified to reflect these strategies.
				Process needs to be more defined regarding review of state statutes, policies and procedures to ensure compliance	7	"I want the HCBS criteria to be outcome oriented and based on upon the person's quality of life experiences."	441.304(d) - (f)	State will utilize existing stakeholder groups to help review state statutes, policies and procedures to ensure compliance. Language in the Transition Plan has been added or modified to reflect these strategies.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"I want campus settings like the one we have at Misericordia to be considered appropriate to meet HCBS criteria which I believe further increases choice for people . . ."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
				Process needs to be more defined regarding review of state statutes, policies and procedures to ensure compliance	7	". . . The ADA, Developmental Disabilities Bill of Rights and the Olmstead Decision, individuals with disabilities have the human right and civil right to be supported in a setting of their choice and not forced into choosing from a more limited set of op	441.304(d) - (f)	State will utilize existing stakeholder groups to help review state statutes, policies and procedures to ensure compliance. Language in the Transition Plan has been added or modified to reflect these strategies.

				Process needs to be more defined regarding review of state statutes, policies and procedures to ensure compliance	7	" . . .the condition that all settings be physically accessible be implemented only when there is a need."	441.304(d) - (f)	State will utilize existing stakeholder groups to help review state statutes, policies and procedures to ensure compliance. Language in the Transition Plan has been added or modified to reflect these strategies.
				General Comment Regarding Statewide Transition Plan and Processes	14	" . . . Post all public comment, as well as state summaries of public comments that will be sent to CMS to ensure a public accountability of actions taken.	I (a), paragraph 5	Illinois is required to meet the expectations of federal CMS in regards to the implementation of HCBS settings. Language in the Transition Plan has been added or modified to reflect these strategies.
				Process needs to be more defined regarding review of state statutes, policies and procedures to ensure compliance	7	" A grandfather clause should be implemented for current residential homes to prevent any disruption to existing residents."	441.304(d) - (f)	State will utilize existing stakeholder groups to help review state statutes, policies and procedures to ensure compliance. Language in the Transition Plan has been added or modified to reflect these strategies.
95	E-mail	Written	Family of a DD Participant	Assurance of available service options to enable participant choice and integration in the greater community	1	" . . . Regarding CILAs in the IL State Transition Plan, I do not agree that they represent the least restrictive environment as demanded by federal legislation for the developmentally disabled."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	" . . CILA should be physically accessible only when a person with a physical disability lives there."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.

				Assurance of available service options to enable participant choice and integration in the greater community	1	"The campus is what makes his employment work. Without the campus, he would not be able to hold down a job and would end up at the CILA in front of a TV all day." "It seems very restrictive to make adults whose have limited skills to spend their lives applying for jobs and day after day being turned down, or to start a new job and over and over, just be fired . . ."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
				Assurance of available service options to enable participant choice and integration in the greater community	1	"Anyone that is happy and thriving in their current situation, be it ICF-DDs or CILAs should not be forced to change."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	" . . . Good environments, grandfather them in their situations."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
96	E-mail	Written	DD Advocate	General Comment Regarding Statewide Transition Plan and Processes	14	" . . . Why a separate assessment had to be developed to provide you with this information? There are already detailed, out-come based accrediting bodies that many IL organizations are accredited by that offer regular detailed assessments of the degree to which individuals are receiving individualized person-driven services."	I (a), paragraph 5	Illinois is required to meet the expectations of federal CMS in regards to the implementation of HCBS settings. Language in the Transition Plan has been added or modified to reflect these strategies.
				General Comment Regarding Statewide Transition Plan and Processes	14	" . . .results from any evaluations and survey be shared with the organizations during the higher scrutiny process."	I (a), paragraph 5	Illinois is required to meet the expectations of federal CMS in regards to the implementation of HCBS settings. Language in the Transition Plan has been added or modified to reflect these strategies.

				Provider reimbursement rates may be barriers to compliance with portions of the CMS regulations	10	"Does the Transition Plan effort anticipate that results identifying lack of public funding be shared with Illinois funders before a required training curriculum is provided? If not it is requested that this be done."	42 CFR 430 Chapter VII, Section 202 of the Unfunded Mandates Reform Act of 1195 (March 22, 1995, Pub. L. 104-4) and Federal Register Vol. 79 No. 11 Part II, first column, second comment and CMS response.	The State recognizes the relationship between reimbursement and the provider's willingness and ability to provide additional service options as envisioned by the regulations. The State intends to comply with the Transition Plan, recognizing reimbursement may need to be addressed on a separate track. State reimbursement for services is subject to the appropriations of our General Assembly.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"It is requested that additional information be obtained from consumers regarding the desired frequency of chosen activities both on and off-site	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"It is suggested that the plan refrain from very generalized data and find a way to consider the many diverse support needs and preferences of the consumers served." ". . . Survey questions seem to consider that the physical location of the organization is the primary influenced of access to community activities. This may not be the only effective way to measure community integration." ". . . questions should be added regarding community members who may visit the consumer in their home, or visitors that the consumer has other than staff, or consumers have unpaid friendships with others than paid staff." ". . . surveys to the consumers of provider agency"	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
				General Comment Regarding Statewide Transition Plan and Processes	14	". . . Workgroups developed by IL leadership to review and assess the results of these surveys also include stakeholder representation."	I (a), paragraph 5	Illinois is required to meet the expectations of federal CMS in regards to the implementation of HCBS settings. Language in the Transition Plan has been added or modified to reflect these strategies.

				General Comment Regarding Statewide Transition Plan and Processes	14	" . . .it is requested that information on transportation resources and individual choice in care and services be collected from waiver participants."	I (a), paragraph 5	Illinois is required to meet the expectations of federal CMS in regards to the implementation of HCBS settings. Language in the Transition Plan has been added or modified to reflect these strategies.
				General Comment Regarding Statewide Transition Plan and Processes	14	"It's requested that the state summary of public comments be posted to ensure accountability . . ."	I (a), paragraph 5	Illinois is required to meet the expectations of federal CMS in regards to the implementation of HCBS settings. Language in the Transition Plan has been added or modified to reflect these strategies.
97	E-mail	Written	Parent of a DD Participant	Process needs to be more defined regarding review of state statutes, policies and procedures to ensure compliance	7	" . . .citizens living in CILA and ICF-DD facilities . . . Is the most diverse, heterogeneous segment of all community groups residing in our state. The diversity of their cognitive development, physical abilities and medical needs challenges care givers and agency providers to develop protocols that meet and satisfy the needs of these citizens."	441.304(d) - (f)	State will utilize existing stakeholder groups to help review state statutes, policies and procedures to ensure compliance. Language in the Transition Plan has been added or modified to reflect these strategies.
				Assurance of available service options to enable participant choice and integration in the greater community	1	"Group homes of four or few residents would isolate and likely diminish the level and amount of care provided . . ."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
				General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	"Why should we mandate the arbitrary and costly retrofitting of CILAs caring for fellow citizens who are not constrained by physical accessibility issues?" "Wasteful retrofitting is not the best use of these finite resources."	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.

				Process needs to be more defined regarding review of state statutes, policies and procedures to ensure compliance	7	"Please develop the most flexible transition guidelines that empower these very capable caregivers to develop programming and residential care settings that meet the unique and extremely diverse needs of our most vulnerable community group."	441.304(d) - (f)	State will utilize existing stakeholder groups to help review state statutes, policies and procedures to ensure compliance. Language in the Transition Plan has been added or modified to reflect these strategies.
98	E-mail	Written	DD Participant	Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"I would just like to say that I have had a wonderful life at Misericordia . . ."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
99	E-mail	Written	Parent of a DD Participant	General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	"it is vitally important that you take into account that one size home and one type of program does not fit all persons with disabilities." " . . . CILAs should not be limited in size to just four residents."	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"The CILA looks like every other house in the neighborhood which makes the CILA residents feels very much a part of the community in which they live."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"It would be devastating . . .for their lives to be disrupted if these rules were implemented in the proposed manner. . . . We would request that current Misericordia CILAs be grandfathered to protect the well-being of the existing residents."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.

100	E-mail	Written	Parents of daughter with a DD	Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"Forcing her to transition from a campus setting to a home is counter-productive....Misericordia...is more than a home...but rather a community..."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
				Assurance of available service options to enable participant choice and integration in the greater community	1	"One size home and one type of program does not fit all persons with disabilities."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
101	E-mail	Written	Family Pastor	Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"she has flourished...company of friends...employment...sports and art activities...personalized home...."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"Proven track record of success...care and love...finding appropriate employment...is unreasonable in a favorable employment climate, let alone the one...today"	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
102	E-mail	Written	Family of DD Participant	Assurance of available service options to enable participant choice and integration in the greater community	1	"Do not let Illinois become more restrictive in its definitions...Do not remove our choices."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.

				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"...works in the recycling program....and the ..laundry...performs with a dance troupe at events throughout Chicago...Misericordia provides the best life possible for him."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
103	E-mail	Written	Family of DD Participant	Assurance of available service options to enable participant choice and integration in the greater community	1	"Do not want the State to become more restrictive in its definition of home and community approved settings...denying further choice for the residents..."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"...Increases choice for people with developmental disabilities...criteria to be outcome-oriented and based upon the person's quality of life experiences..."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
104	E-mail	Written	Provider	Process needs to be more defined regarding review of state statutes, policies and procedures to ensure compliance	7	"Rule 119 regulations promote a large facility based program...needs to be revised or re-written to make it more community-friendly...Separate transportation costs from funding...expectation that everyone ...receive Rule 50 training and background checks is not realistic..."	441.304(d) - (f)	State will utilize existing stakeholder groups to help review state statutes, policies and procedures to ensure compliance. Language in the Transition Plan has been added or modified to reflect these strategies.

				Provider reimbursement rates may be barriers to compliance with portions of the CMS regulations	10	"Eliminate the requirement to be in service for 240 days at a minimum of 5 hours per day. Current funding does not support that many hours..need a different funding model..."	42 CFR 430 Chapter VII, Section 202 of the Unfunded Mandates Reform Act of 1195 (March 22, 1995, Pub. L. 104-4) and Federal Register Vol. 79 No. 11 Part II, first column, second comment and CMS response.	The State recognizes the relationship between reimbursement and the provider's willingness and ability to provide additional service options as envisioned by the regulations. The State intends to comply with the Transition Plan, recognizing reimbursement may need to be addressed on a separate track. State reimbursement for services is subject to the appropriations of our General Assembly.
105	E-mail	Written	Parent of DD Participant	Comments or questions in support of the HCBS Settings Rules	2	"Comply with rules...exactly as Written...add no additional restrictions to our state's regulations on HCBS settings... additional restrictions will limit...choice...innovation...infrastructure development..."	N/A	No action to be taken.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"Farmsteads are licensed regulated models that offer...an option to live a life highly connected with their broader community...Farmsteads are not large congregate facilities... participants shop, worship, work, travel, recreate bank and have fun in the broad community."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
106	E-mail	Written	Parent of DD Participant	Assurance of available service options to enable participant choice and integration in the greater community	1	"New initiatives should not be at the expense of existing services...options and choices should not be eliminated..."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.

				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"enjoy meaningful daily activities...interactions with peers...(if) categorized as 'employable' ..must be competitively employed in the marketplace... (means) ...in many cases, these residents will spend their days literally doing nothing..."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
107	E-mail	Written	Family of DD Participant	Assurance of available service options to enable participant choice and integration in the greater community	1	"Individuals with disabilities have the right to multiple choices of workplaces...must have an array of choices for support options, settings and opportunities for the changing needs of their lifespan."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"ICF-DD's are a perfectly fine choice and they are not institutions. They are homes. They work..." The campus is a community in the best sense of the word..."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
108	E-mail	Written	Family of DD Participant	Assurance of available service options to enable participant choice and integration in the greater community	1	Choose to participate in activities...meaningful jobs...full gym...therapy pool...exhibited artwork at the Art Institute of Chicago...People with disabilities deserve a full array of choices..."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.

				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	The women in my sister's home are friends...a second family with whom she shares her life...share meals, go out to movies together..enjoy community events...full life...opportunities she would never be able to find living independently..	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
109	E-mail	Written	Parent of DD Participant	Assurance of available service options to enable participant choice and integration in the greater community	1	"...continuum of care...optimum living and learning arrangements...current choices should not be restricted or compromised by new regulations..."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"...Misericordia, which is nationally recognized as a 'model' for providing successful, effective and compassionate homes for the developmentally disabled.."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
110	E-mail	Written	Parent of DD Participant	Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"...opportunity to participate in sports, choir, dances, outings...has a minimum wage job (outside the community) 3 hours a day, five days a week..without Misericordia...he would be living in the community, but sitting in front of a television all day...Big is not always bad. Well run big is a big advantage!"	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.

111	E-mail	Written	Parent of DD Participant	Assurance of available service options to enable participant choice and integration in the greater community	1	"People with disabilities should have a choice of how and where they live...friendships, exercise activities...creative expression through art, cooking, cleaning...social activities..."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"Our daughter lives in an 'ICF-DD'. It is fantastic for her. It is NOT an institution. It is her home...She enjoys a meaningful life because she is fortunate to be an active resident at Misericordia..."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
112	E-mail	Written	Parent of DD Participant	Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"son...has lived at Misericordia for 38 years...love...family life (in the CILA), array of residential chores, exercise classes/therapies, fitness and health guidance and social and recreational activities...environment of love, support, encouragement, guidance, dignity and respect."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
113	E-mail	Written	Parent of DD Participant	Assurance of available service options to enable participant choice and integration in the greater community	1	"to become more restrictive in its definition of 'home and community' approved settings which...will have the impact of denying further choice for the residents....annual staffing plan at Misericordia which sets forth his choices for the year...this optimizes his life experiences..."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.

				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"We want campus settings like the one we have at Misericordia to be considered to be appropriate to meet HCBS criteria...Residents have established relationships and connections to their internal and external communities which should be encouraged and protected."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
114	E-mail	Written	Advocate	Comments or questions in support of the HCBS Settings Rules	2	"Equip for Equality is extremely supportive of these concepts (extensive participant involvement and choice and...real opportunities for community integration..."	N/A	No action to be taken.
				Process needs to be strengthened in relationship to self-administered provider surveys and inclusion of participants and their Plans of Care	8	"As the state revises its plan...additional formal comment periods to receive input are essential...surveys did not include any stakeholder input...cannot rely on surveys of service providers alone...must consult with actual recipients of these services, as well as advocates...(surveys) should not be the sole basis for determining whether a site gets a site visit...supplement the survey results with a survey sent to recipients of services...Consider those results when determining compliance with the new HCBS rules..."	441.304(d) - (f)	State intends to establish consumer focus groups during validation site visits and review a sample of the participant's Plans of Care. State plans to establish three levels of validation of provider survey results including visiting providers that demonstrated a high level of compliance. Validation site visits will be conducted by an independent third party. Review of Plans of Care will aid in current and future development of Participant Plans of Care, but also may influence state statutes, policies and procedures. Language in the Transition Plan has been added or modified to reflect these strategies.

				<p>General Comment Regarding Statewide Transition Plan and Processes</p>	14	<p>"Plan is replete with vague, qualifying phrases...underdeveloped...difficult to comment on how it will impact individuals receiving HCBS...It is critical that stakeholder input be considered at each step....On-site focus groups should be held at every location...Include stakeholders such as an individual or a family member as part of the multi-disciplinary team conducting site visits...The State should increase the number of providers it will randomly sample from 2%...to at least 30%...There is no mention of ensuring that (those who will be relocated) will be relocated to the most integrated setting appropriate to the individual's needs...The Plan should be revised or explicitly include this requirement...The plan makes no mention of ...opportunities to work in competitive settings or how Illinois will ensure that those opportunities are ...increased. Illinois must commit...in the Plan to increasing these opportunities...The Plan should explain how the State will determine whether specific language (in the statutes, policies and procedures) is in compliance...and include stakeholders in this process..."</p>	I (a), paragraph 5	<p>Illinois is required to meet the expectations of federal CMS in regards to the implementation of HCBS settings. Language in the Transition Plan has been added or modified to reflect these strategies.</p>
				<p>Timeframes identified in Statewide Transition Plan may not be realistic.</p>	13	<p>Much of the (assessments of ongoing compliance) should be developed prior to (January, 2018), particularly the incorporation of person-centered planning requirements..."</p>	441.301(c)(6)(B)	<p>State plans to work with legal and policy representatives that represent all nine (9) of the HCBS Waivers to ensure process moves forward at a timely pace. Timeframes indicated in Transition Plan will continuously be reviewed.</p>
				<p>General comment or concern about the quality of a program and/or choice options</p>	5	<p>"One particular area in which Illinois is lacking is non-disability specific settings where housing is available separate from the services offered there...ensure that individuals have a true choice of where to live...Another issue is the bundling of services and housing...Individuals should easily be able to obtain housing from one provider and services from another."</p>	441.301(4)(i)	<p>Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.</p>

				Process needs to be strengthened in State oversight of HCBS Providers to ensure compliance	9	"Ongoing Compliance" section of the...Plan...lacks detail...State must design a process that can be readily and easily accessed and understood by individuals with disabilities to ensure that individual's goals are incorporated into their services and fulfilled....Modifying...a template in the annual review is unlikely to result in the shift necessary to fully comply with the new rules...(and) the person-centered planning requirements. The State must make a much stronger commitment to helping service providers modify their practices to comply with these requirements."	441.302	Over the next four years, all new and renewed waivers will be reviewed with a sensitivity to assure waiver assurances and performance measures comport with the HCBS rules. Language in the Transition Plan has been added or modified to reflect these strategies.
115	E-mail	Written	Parent of DD Participant	Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"The Misericordia campus is very much like a small college campus, providing not only educational and work opportunities, but also social and spiritual experiences for all residents...allows for a healthy feeling of community...a sense of well-being and acceptance of those living on and off campus in the CILA's ...the campus serves to enhance the very independent lives in the community in the houses they call home and that they love.."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
116	E-mail	Written	Parent of DD Participant	Assurance of available service options to enable participant choice and integration in the greater community	1	"...do not...become more restrictive in (the State's) definition of 'home and community' approved settings... which...will have the impact of denying further choice for the residents...annual staffing plan...sets forth her choices for the year...optimizes her life experiences..."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"...Campus settings like the one we have at Misericordia...contribute to the continuum of choice...to all residents...XXX absolutely loves her life at Mis..My family considers everyone at Mis as our extended family...Misericordia has a future and we do not want the government threatening that future..."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.

117	E-mail	Written	Parent of DD Participant	Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"For disabled individuals like my daughter, happiness is what is most important...Regulations...are worthless unless they work to ensure the happiness of those they seek to protect...she is very happy living in a 7-person CILA...at Misericordia	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
				Provider reimbursement rates may be barriers to compliance with portions of the CMS regulations	10	"There are not enough CILA's being developed in Illinois due to inadequate funding."	42 CFR 430 Chapter VII, Section 202 of the Unfunded Mandates Reform Act of 1195 (March 22, 1995, Pub. L. 104-4) and Federal Register Vol. 79 No. 11 Part II, first column, second comment and CMS response.	The State recognizes the relationship between reimbursement and the provider's willingness and ability to provide additional service options as envisioned by the regulations. The State intends to comply with the Transition Plan, recognizing reimbursement may need to be addressed on a separate track. State reimbursement for services is subject to the appropriations of our General Assembly.
				Assurance of available service options to enable participant choice and integration in the greater community	1	"In seeking to expand employment, existing campus opportunities should not be sacrificed...Individuals with disabilities have the right to multiple choices of workplaces..."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
118	E-mail	Written	Parent of DD Participant	Assurance of available service options to enable participant choice and integration in the greater community	1	"As protected by the ADA, DD Bill of Rights and the Olmstead Decision, individuals have the human right and the civil right to be supported in a setting of their choice and not forced into choosing from a more limited set of options..."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.

119	E-mail	Written	Parent of DD Participant	Assurance of available service options to enable participant choice and integration in the greater community	1	"...in many respects, Misericordia has always practiced Person Centered Planning...we discuss in depth (annually) her progress over the year and work with her to set goals...based on Betsy's interests, choices and aspirations with input from our family and the professionals she engages with..."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
120	E-mail	Written	Family of DD Participant	Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"...sister lives in a wonderful, supportive Misericordia CILA...is thriving in her current situation...the meaningful, satisfying fulfilling work which XXX does on campus...should not be taken away. That campus is a community where she and many others have rich friendships and relational opportunities..."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
121	E-mail	Written	Parent of DD Participant	Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"...son has lived at Misericordia ...for two years...has made many friends...has encouragement and support from...staff...participates in social activities on the campus, as well as in the community with his housemates. He has an active and meaningful life. In his own words, "Misericordia is the greatest place on earth!"...While community-based recreation and leisure activities are important...we have found that our family members are not always welcomed in the community. Being physically present in the community doesn't always make them an accepted part of the community. That's why social and leisure activities on Misericordia's campus are such an important part of our family members' lives. They are accepted and appreciated for who they are..."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.

				Assurance of available service options to enable participant choice and integration in the greater community	1	"He works four hours weekly at a restaurant (in the community)...We have found that jobs for our son have been difficult to find...One employer was able to give him two short shifts which he can work successfully. The rest of his time is spent on ...campus engaged in work and day programming activities.	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
122	E-mail	Written	Parent of DD Participant	Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"recently became a resident in a CILA ...she had a job in a theater for ten years...but was only able to work 12 hours a week. Now, because of the astonishing facilities at Misericordia, she is able to have two other part-time jobs that keep her days busy and productive...Perhaps you do not realize how the world of a disabled person shrinks when he or she leaves school...for people of limited communication skills, maintaining connections is almost impossible....(the CILA) provides her with the social contact which enriches her life...She goes out to dinner, to the movies, ..apple-picking...If people are happy, busy and productive, why would you try to change that?"	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
123	E-mail	Written	DD Provider	Assurance of available service options to enable participant choice and integration in the greater community	1	"Individuals must have personal choice in their care and in residential options. There should not be a one size fits all philosophy regarding services for individuals with developmental disabilities."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.

				Comments or questions in support of the HCBS Settings Rules	2	"It is unfortunate that our federal government initially defined community in terms of the setting. The final rules issued in January changed by defining community based on the nature and quality of the individual's experience. If that is truly the case, then the definition of community is driven by the individuals themselves and by their families/guardians."	N/A	No action to be taken.
				Process needs to be strengthened in relationship to self-administered provider surveys and inclusion of participants and their Plans of Care	8	"Illinois did not survey the consumers or the consumers' families on their experiences in the current settings. Illinois should collect this data. The focus should be on the quality of life and not the physical characteristics of the setting...State should...begin asking individuals what they want both residentially and for day programs. The State should not be asking the advocates who believe there is only one way and it is their way and not necessarily the individual's choice."	441.304(d) - (f)	State intends to establish consumer focus groups during validation site visits and review a sample of the participant's Plans of Care. State plans to establish three levels of validation of provider survey results including visiting providers that demonstrated a high level of compliance. Validation site visits will be conducted by an independent third party. Review of Plans of Care will aid in current and future development of Participant Plans of Care, but also may influence state statutes, policies and procedures. Language in the Transition Plan has been added or modified to reflect these strategies.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"The State must offer a range of choices. A house in the community can be even more isolating than a setting in which intentional community is provided. Many of these types of communities are very involved in the community and the community is involved with them. Integration within the community should not be assessed by an individual's presence in the community, but by their relational presence with community members."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.

124	E-mail	Written	Family of DD Participant	Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"Billy lives at the Misericordia Moore House...a home where he can thrive...a community where each individual's unique personality and abilities have transformed into shared responsibility and fellowship...Moore House is a success story, what a CILA house should be...These wonderful people will suffer real loss if sudden change comes in the form of new policy."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
125	E-mail	Written	Family of DD Participant	Assurance of available service options to enable participant choice and integration in the greater community	1	"Each person should have the choice whether to seek integration into the community through the competitive work force or through opportunities that are offered by a home such as Misericordia."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"The definition of 'home' and 'community' should not be based on physical characteristics, but on the quality of life of the residents...The HCBS criteria and assessments should be based on outcome, results and personal choice, not bureaucratic definitions...My brother's life at Misericordia is part of a community that allows him to live in a comfortable home with his peers....An ICF-DD is his home that works for him...It is not an institution, but a loving, working environment..."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site visits to validate and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.

126	E-mail	Written	Parent of DD Participant	Assurance of available service options to enable participant choice and integration in the greater community	1	"We do not want the State to become more restrictive in its definition of home and community based approved settings which would deny choices for our residents...Misericordia provides a continuum of choice for all residents	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"Misericordia's loving environments encourage Godly respect for one another, love and concern...Something our city, state, country and world should emulate and embrace."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
127	E-mail	Written	Provider	Timeframes identified in Statewide Transition Plan may not be realistic.	13	"The target dates of 2017 for reviewing and revising regulatory policies will allow only a two year transition for providers to implement the changes and come into compliance...providers will not have adequate time to change their service models in order to meet the definitions put forth in the HCBS rule."	441.301(c)(6)(B)	State plans to work with legal and policy representatives that represent all nine (9) of the HCBS Waivers to ensure process moves forward at a timely pace. Timeframes indicated in Transition Plan will continuously be reviewed.

				<p>Specific concern that implementation of Transition Plan could add additional burden to provider and responsible parties</p>	12	<p>"..in southern and southwestern Illinois, opportunities for employment are few...the unemployment rate for non-disabled workers is high..>Employers are not willing to make exceptions for employees who cannot complete the entire job they are hiring for. Supported Employment and Community Placements providers have difficulty getting placements for individuals with disabilities, but an even more difficult time assisting them in maintaining that employment opportunity."</p>	<p>42 CFR 430 Chapter VIII. Section 202 of the Unfunded Mandates Reform Act of 1195 (March 22, 1995, Pub, L. 104-4)</p>	<p>State will utilize existing stakeholder groups to help review state statutes, policies and procedures to ensure compliance. HCBS Rules are in effect and state is responsible for their implementation. Language in the Transition Plan has been added or modified to reflect these strategies.</p>
				<p>Assurance of available service options to enable participant choice and integration in the greater community</p>	1	<p>There are many opinions...regarding what is considered isolating and what is considered opportunity. It is my hope that Illinois is not going to become an all or nothing state in regards to service opportunities for individuals...Employment First is a noble and achievable goal...Employment Only is not an achievable or realistic goal for all providers and individuals. I hope that Illinois will ensure that all service models are allowed the opportunity to continue to provide services making the changes to ensure that opportunities for community integration and employment are offered.</p>	<p>441.301(4)(i)</p>	<p>Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.</p>
				<p>Process needs to be more defined regarding review of state statutes, policies and procedures to ensure compliance</p>	7	<p>"Please make the expectations on community integration, as well as how those opportunities are documented, clear and concise for providers...needs to be an explanation of Conflict Free Case Management...This becomes tricky when there is no residential provider and the day program becomes the responsible party for developing the plan and implementing it. Please ensure that conflict free case management is explained and made reasonable...needs to be clarification regarding the fact that ICF/DD homes are not found to be HCBS compliant. How does that impact the individuals who reside in the ICF/DD home but attend a DHS funded day program? If</p>	<p>441.304(d) - (f)</p>	<p>State will utilize existing stakeholder groups to help review state statutes, policies and procedures to ensure compliance. Language in the Transition Plan has been added or modified to reflect these strategies.</p>

						<p>their residential setting is found out of HCBS compliance then doe so that make them ineligible for day services that are HCBS funded? These questions must be answered so providers and individuals can make informed choices..."</p>		
				<p>Provider reimbursement rates may be barriers to compliance with portions of the CMS regulations</p>	<p>10</p>	<p>In order for programs to be capable of moving individuals forward into community integration and community employment a very significant change in the way these services are funded must be implemented. The staff to client ratio must be significantly smaller...The current developmental training ratio formulas will not provide the financial support in order to ensure adequate staff are available to support individuals in their goals to be employed in the community. There must be significantly increased funding for supported employment programming and transitional programming to support the increased mandates and expectations from the federal and eventually the state level."</p>	<p>42 CFR 430 Chapter VII, Section 202 of the Unfunded Mandates Reform Act of 1195 (March 22, 1995, Pub. L. 104-4) and Federal Register Vol. 79 No. 11 Part II, first column, second comment and CMS response.</p>	<p>The State recognizes the relationship between reimbursement and the provider's willingness and ability to provide additional service options as envisioned by the regulations. The State intends to comply with the Transition Plan, recognizing reimbursement may need to be addressed on a separate track. State reimbursement for services is subject to the appropriations of our General Assembly.</p>

128	E-mail	Written	Parent of DD Participant	Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	<p>My daughter Shea has a full life in a lovely house, with several women. They are as close as if they were sisters. Shea is employed at a Catholic School, but benefits from Misericordia's campus setting and employment opportunities when school is off for summer and various holidays. Furthermore, as you may know many residents / disabled adults are unable to work a 40 hour a week job, even if they could find them, because it would jeopardize their Social Security funding.</p> <p>My friends with children in CILAs without campus support spend a lot of time in front of a TV and are unemployed due to lack of infrastructure to get residents to multiple job sites and community programs. How is that enabling community integration and choice? Misericordia's CILAs are a working and wonderfully implemented example of community integration with the NECESSARY supports provided by a campus setting.</p>	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
129	E-mail	Written	Participant	Comments or questions regarding issues not related to Transition Plan	3	I have autism. I composed this E-mail because I want to receive Medicaid waiver funding, and I would like for the ones who are already receiving it to continue. We need all the benefits that we can receive in order for us to live better lives.	N/A	These represent questions or comments that do not appear to relate to HCBS settings rules and are not being addressed in the Transition Plan.
130	E-mail	Written	Parent of DD Participant	Assurance of available service options to enable participant choice and integration in the greater community	1	The key term in the description of what is sought is "opportunity. The danger is that overly restrictive regulations can result in a decrease in "opportunity."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.

				Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	<p><u>Employment opportunities.</u> The criteria for judging what a desirable work experience is is not where it is located but what it entails. I volunteer in a bakery (at Misericordia Home) where many individuals from group homes work. Some have jobs in the private sector and come to the bakery to round out their work week. Others require a far greater level of support than the private sector is prepared to provide. And we have been able to help some of these individuals grow their work skills so they graduated to jobs in the private sector. But just as importantly, when one of our workers comes to the job, she or he finds a mixture of other group home residents, professional bakers and many volunteers who create a work experience comparable to and in many cases superior to the work experience in the private sector. To take away this opportunity simply because the bakery exists on the campus of Misericordia Home rather than in a building four blocks away is a simple criteria to enforce but is arbitrary and is a disservice to those it is supposed to assist.</p>	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
131	E-mail	Written	Family	Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"We appeal to you that these Colas and Misericordia are able to continue to run just as they are. I would appreciate any information you might have regarding this subject"	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site visits to validate and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.

132	E-mail	Written	Family	Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"We would like to stress that it is important that Illinois not become more restrictive on its definitions of HCBS settings. "	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
133	Rockford	Oral	Family	General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	"It is very confusing and it's almost like we have this menu of things that look really nice and we want but we can't order from it. It seems like as far as group homes things like that that "are near our homes that we would find acceptable to put our children in doesn't seem we have the numbers to accommodate that so I think it's great to have this outline of where we want to go but I am having trouble seeing how to get there in the next few years with him	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
				Provider reimbursement rates may be barriers to compliance with portions of the CMS regulations	10	"I'm not really understanding how we are going to get there in 4 years especially with funding issues our state has"	42 CFR 430 Chapter VII, Section 202 of the Unfunded Mandates Reform Act of 1195 (March 22, 1995, Pub. L. 104-4) and Federal Register Vol. 79 No. 11 Part II, first column, second comment and CMS response.	The State recognizes the relationship between reimbursement and the provider's willingness and ability to provide additional service options as envisioned by the regulations. The State intends to comply with the Transition Plan, recognizing reimbursement may need to be addressed on a separate track. State reimbursement for services is subject to the appropriations of our General Assembly.
134	Rockford	Oral	Family	Comments or questions regarding issues not related to Transition Plan	3	"And I think one of the conditions of the Ligas is you have to let us know where we are on the waiting list. Where are we? It's like we're standing in limbo. Where do we stand? Are we "2 million or only at 100 thousand. I'm just being funny and I know it is not funny but we want to know where we are and that's part of Ligas and that's something I want to look at too. So I can get your email and if I can find out who to call to find out where you are on PUNS."	N/A	These represent questions or comments that do not appear to relate to HCBS settings rules and are not being addressed in the Transition Plan.

135	Frankfort	Oral	Family	Assurance of available service options to enable participant choice and integration in the greater community	1	"They have to be able to do what they want to do. A program is someplace you go, a service is something you get. And everybody says there's no program like that. That's right and I don't want there to be. I want it to be a service. I want my kids to have access to the community at large like everyone else does. In order to get them there you have to be able to pay for things and they have to have that freedom."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
				General comment or concern about the quality of a program and/or choice options	5) They have to be able to do what they want to do. A program is someplace you go, a service is something you get. And everybody says there's no program like that. That's right and I don't want there to be. I want it to be a service. I want my kids to have access to the community at large like everyone else does. In order to get them there you have to be able to pay for things and they have to have that freedom.	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
136	Frankfort	Oral	Family	General comment or concern about the quality of a program and/or choice options	5	" I just wanted to say there needs to be some flexibility. In other words, it shouldn't be the same thing every day. They need to go out into the community. There are varied experiences out in the community. If not Monday we go and sit down and do puzzles and Tuesday we go and sit down and stack some blocks or something. It needs to be something that is relevant and it needs to be something that is varied and needs to be flexible."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.

137	Frankfort	Oral	Family	Process needs to be strengthened in relationship to self-administered provider surveys and inclusion of participants and their Plans of Care	8	"The plan does survey providers but I didn't see anything in the plan to survey where there was a plan to survey consumers or individuals who receive these services. I was wondering if that was going to ultimately be part of the plan because this is a plan to plan. And not just sites that will be visited but individuals who are receiving services and possibly randomly sampling caregivers, parents and guardians."	441.304(d) - (f)	State intends to establish consumer focus groups during validation site visits and review a sample of the participant's Plans of Care. State plans to establish three levels of validation of provider survey results including visiting providers that demonstrated a high level of compliance. Validation site visits will be conducted by an independent third party. Review of Plans of Care will aid in current and future development of Participant Plans of Care, but also may influence state statutes, policies and procedures. Language in the Transition Plan has been added or modified to reflect these strategies.
				General comment or concern about the quality of a program and/or choice options	5	"My second comment, it does seem to be a natural assumption or that its part of the assumption that Day Training is part of the package. In my own personal experience, it was very, very difficult to find a provider and then work with a provider that will allow my daughter her current day. In other words, she is an adult, she has an established day but predominantly the overriding thought and I am not provider bashing but the overriding message and what we experienced was Day Training is what we do. So I guess I'm trying to tell you is there is really not a lot of choice."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
138	Frankfort	Written	Family and Advocate	Provider reimbursement rates may be barriers to compliance with portions of the CMS regulations	10	"I am concerned because right now I have talked to several providers to get services for my daughter and this isn't against a provider but we have gone through all the things we need to serve her but the bottom line is the state does not provide an adequate rate to meet the needs of my daughter"	42 CFR 430 Chapter VII, Section 202 of the Unfunded Mandates Reform Act of 1195 (March 22, 1995, Pub. L. 104-4) and Federal Register Vol. 79 No. 11 Part II, first column, second comment and CMS response.	The State recognizes the relationship between reimbursement and the provider's willingness and ability to provide additional service options as envisioned by the regulations. The State intends to comply with the Transition Plan, recognizing reimbursement may need to be addressed on a separate track. State reimbursement for services is subject to the appropriations of our General Assembly.

139	Frankfort	Oral	Unknown	Assurance of available service options to enable participant choice and integration in the greater community	1	"I would like to say something that sort of disagrees a little bit with what you were talking about earlier about people talking about the services that are needed. I think it does directly tie in and I don't know how you separate it because if you don't have those service options we can't meet the rules in some ways. So if we don't have the services that allow individual supports in settings outside of CILAs and 24 hours CILAs is the only choice you have, how do you make that more in the community? "	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
140	Frankfort	Oral	Family and Advocate	General comment or concern about the quality of a program and/or choice options	5	"they talk about in the CMS rules like privacy having her how room is very huge to her. And quite honestly I never knew was important to her " " Having her own room is something so basic to her and it's something I have already had a certain amount of static about from providers" " I have received phone calls stating they are considering her having a roommate and I asked why and the reason was there was someone they were already serving who do very well"	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
141	Frankfort	Oral	Provider	Process needs to be strengthened in relationship to self-administered provider surveys and inclusion of participants and their Plans of Care	8	"I thought I would share a few thoughts as a provider. I completed the self-assessment surveys for our organization and I wanted to do that because I really wanted to feel what that process was and to get to better understand it. So I completed the surveys on behalf of for over 40 properties that we operate programs in as well as the administrative surveys. For folks that didn't complete they are very detailed, asked a lot of specific questions. You never once ever said do you think you are in compliance or not in compliance that was referred by the responses."	441.304(d) - (f)	State intends to establish consumer focus groups during validation site visits and review a sample of the participant's Plans of Care. State plans to establish three levels of validation of provider survey results including visiting providers that demonstrated a high level of compliance. Validation site visits will be conducted by an independent third party. Review of Plans of Care will aid in current and future development of Participant Plans of Care, but also may influence state statutes, policies and procedures. Language in the Transition Plan has been added or modified to reflect these strategies.

				Process needs to be strengthened in State oversight of HCBS Providers to ensure compliance	9	"I think obviously the Transition Plan has to address the resources that are going to be required to bring the system into compliance with the new definition." " Most organizations that I know of feel that we are very far away from compliance within the definition"	441.302	Over the next four years, all new and renewed waivers will be reviewed with a sensitivity to assure waiver assurances and performance measures comport with the HCBS rules. Language in the Transition Plan has been added or modified to reflect these strategies.
142	Frankfort	Oral	Family	Assurance of available service options to enable participant choice and integration in the greater community	1	"you can talk person-centered language but if you don't change your paradigms and start thinking person-centered again it's just language and not changing the program"	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
				Provider reimbursement rates may be barriers to compliance with portions of the CMS regulations	10	"the red flags that go up for our individuals is the under met needs for the rates Illinois has not adjusted their rates for providers. The State of Illinois has such a difficult time, first thing that gets cut is the Department of Human Services budget"	42 CFR 430 Chapter VII, Section 202 of the Unfunded Mandates Reform Act of 1195 (March 22, 1995, Pub, L. 104-4) and Federal Register Vol. 79 No. 11 Part II, first column, second comment and CMS response.	The State recognizes the relationship between reimbursement and the provider's willingness and ability to provide additional service options as envisioned by the regulations. The State intends to comply with the Transition Plan, recognizing reimbursement may need to be addressed on a separate track. State reimbursement for services is subject to the appropriations of our General Assembly.
143	Frankfort	Oral	Advocate	General Comment Regarding Statewide Transition Plan and Processes	14	"how will this transition affect the Latino community? What is the plan for communication or lack of communication with that population? A lot of families still aren't aware of the PUNS and I try to get the word out."	I (a), paragraph 5	Illinois is required to meet the expectations of federal CMS in regards to the implementation of HCBS settings. Language in the Transition Plan has been added or modified to reflect these strategies.
144	UIC	Oral	Participant	General comment or concern about the quality of a program and/or choice options	5	"It's all about consumer control and in a group home, I'm here to tell you, you don't get that. I don't care what the statistics say, you don't get that, and I hear that from a lot of other consumers and colleagues that I work with regarding group homes."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.

145	UIC	Oral	Participant	General Comment Regarding Statewide Transition Plan and Processes	14	"How many people who are disabled are going to help you write the Transition Plan? We would like to help you write it because we know better than the state how to write a plan"	I (a), paragraph 5	Illinois is required to meet the expectations of federal CMS in regards to the implementation of HCBS settings. Language in the Transition Plan has been added or modified to reflect these strategies.
146	UIC	Oral	Provider	Assurance of available service options to enable participant choice and integration in the greater community	1	"do not overlook the continuation of support services that are critical for those individuals who continue to live in the community in an integrated setting....To prevent hospitalization and institutionalization you need to provide the individual with supports."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
147	UIC	Oral	Participant	Assurance of available service options to enable participant choice and integration in the greater community	1	"Caseworkers... they are like brand new people each time I meet them because it's too short of a time for me to get to know them. And now I have so many people come into my house.....what I can't do without having to re-teach people all the time all my capabilities"	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
148	UIC	Oral	Family	General Comment Regarding Statewide Transition Plan and Processes	14	"People get their long term care services through the Manage Care organizations so that needs to be a part of the Transition Plan"	I (a), paragraph 5	Illinois is required to meet the expectations of federal CMS in regards to the implementation of HCBS settings. Language in the Transition Plan has been added or modified to reflect these strategies.
149	UIC	Oral	Agency	Assurance of available service options to enable participant choice and integration in the greater community	1	"find ways to develop a program that giving new funding and community access to deaf and blind people..... We have found some barriers because the plan doesn't recognize the issues of mobility and community access for their clients. It focuses on physical challenges"	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.

150	UIC	Oral	Participant	General Comment Regarding Statewide Transition Plan and Processes	14	"make sure employment is at the forefront"	I (a), paragraph 5	Illinois is required to meet the expectations of federal CMS in regards to the implementation of HCBS settings. Language in the Transition Plan has been added or modified to reflect these strategies.
				Assurance of available service options to enable participant choice and integration in the greater community	1	. My life happens outside of my home and what do I do when for the 12 hours I'm outside of my home? I'm out going to school, I'm out looking for a job but I still need assistance during the middle day and that is not being addressed because they are saying the services have to be in the home	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
151	UIC	Oral	Agency	Comments or questions in support of the HCBS Settings Rules	2	We support the overall direction of the Federal Rules on employment opportunity	N/A	No action to be taken.
				Assurance of available service options to enable participant choice and integration in the greater community	1	"Too often people with disabilities get treated as children instead of the adults they are with rights that they need to have respected..... Service plans and evaluations need to reflect the desires of consumers to live active lives in the community. Most people do not want to spend all their time at home. They need community and the community needs them"	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
				Comments or questions in support of the HCBS Settings Rules	2	"We hope that the state pays attention to the goals of a balanced system as described by CMS that is person driven, inclusive, effective, coordinated, transparent and culturally competent"	N/A	No action to be taken.
152	UIC	Oral	Advocate	Comments or questions in support of the HCBS Settings Rules	2	"we are very pleased to see the state plans to incorporate consumer and family feedback as part of the state site visit process to determine an HCBS program's compliance with the settings rule"	N/A	No action to be taken.

				General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	we support the State’s plan to deliver consistent training curriculum to ensure that waiver participants and families have accurate information about how these changes may affect them as well, to educate them on person-centered planning and how they can gain greater control on the direction of their Home and Community-Based waiver services.	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
153	UIC	Oral	Participant Self Advocate	Process needs to be strengthened in relationship to self-administered provider surveys and inclusion of participants and their Plans of Care	8	"Are you including people with disabilities in this plan to make these recommendations because it's about our lives? We should be at the table. When people are making plans for people's lives....Who better to know that people with disabilities themselves?"	441.304(d) - (f)	State intends to establish consumer focus groups during validation site visits and review a sample of the participant's Plans of Care. State plans to establish three levels of validation of provider survey results including visiting providers that demonstrated a high level of compliance. Validation site visits will be conducted by an independent third party. Review of Plans of Care will aid in current and future development of Participant Plans of Care, but also may influence state statutes, policies and procedures. Language in the Transition Plan has been added or modified to reflect these strategies.
				Process needs to be strengthened in State oversight of HCBS Providers to ensure compliance	9	"Is there any monitoring for people after they have this plan? Who is going to make sure that people are implementing this plan and making sure people really have choices?"	441.302	Over the next four years, all new and renewed waivers will be reviewed with a sensitivity to assure waiver assurances and performance measures comport with the HCBS rules. Language in the Transition Plan has been added or modified to reflect these strategies.
				Provider reimbursement rates may be barriers to compliance with portions of the CMS regulations	10	"They also needs to have some support people, some personal assistants have a good wage. Without that they can go and work somewhere else and make more money..."	42 CFR 430 Chapter VII, Section 202 of the Unfunded Mandates Reform Act of 1195 (March 22, 1995, Pub. L. 104-4) and Federal Register Vol. 79 No. 11 Part II, first column, second comment and CMS response.	The State recognizes the relationship between reimbursement and the provider’s willingness and ability to provide additional service options as envisioned by the regulations. The State intends to comply with the Transition Plan, recognizing reimbursement may need to be addressed on a separate track. State reimbursement for services is subject to the appropriations of our General Assembly.

154	UIC	Oral	Parent of a DD Participant	Process needs to be more defined regarding review of state statutes, policies and procedures to ensure compliance	7	"If we are moving towards a more person-centered life a more community based life, a more integrated life, we really need to change some of these rules and regulations	441.304(d) - (f)	State will utilize existing stakeholder groups to help review state statutes, policies and procedures to ensure compliance. Language in the Transition Plan has been added or modified to reflect these strategies.
				Provider reimbursement rates may be barriers to compliance with portions of the CMS regulations	10	"I can't get paid for all the work I do for my daughter and that's ok for me but for a professional personal assistant that is not going to be ok/ My daughter ironically needs more support in the community than she does at home."	42 CFR 430 Chapter VIII. Section 202 of the Unfunded Mandates Reform Act of 1195 (March 22, 1995, Pub, L. 104-4)	The State recognizes the relationship between reimbursement and the provider's willingness and ability to provide additional service options as envisioned by the regulations. The State intends to comply with the Transition Plan, recognizing reimbursement may need to be addressed on a separate track. State reimbursement for services is subject to the appropriations of our General Assembly.
155	UIC	Oral	Provider	General Comment Regarding Statewide Transition Plan and Processes	14	"I would hope that any transition planning and consideration of changes to the waiver program will really take into account the need to offer that funding to a larger number of people who really need it."	I (a), paragraph 5	Illinois is required to meet the expectations of federal CMS in regards to the implementation of HCBS settings. Language in the Transition Plan has been added or modified to reflect these strategies.
156	UIC	Oral	Parent of a DD Participant	Current Service Options/Definitions need to be reviewed and/or expanded under existing HCBS waivers and align with CMS regulations	4	"I am a consultant dietician and I go into these ICFs and I think you need to define what food is. Because in your best facilities, food will be at a table and no problem but at your work facilities maybe they'll put out some crackers and you really need to spell out what food is."	441.304(d) - (f)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
157	Webinar	Written	SLF Provider	General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	"Are all SLF facilities affected by this?"	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
158	Webinar	Written	Association	General Comment Regarding Statewide Transition Plan and Processes	3	Are we getting a copy of this presentation?	N/A	These represent questions or comments that do not appear to relate to HCBS settings rules and are not being addressed in the Transition Plan.

159	Webinar	Written	State Staff	General Comment Regarding Statewide Transition Plan and Processes	3	"Can I get a copy of the slides?"	N/A	These represent questions or comments that do not appear to relate to HCBS settings rules and are not being addressed in the Transition Plan.
160	Webinar	Written	DD Provider	General Comment Regarding Statewide Transition Plan and Processes	14	"How can you discuss/explain the statement that "person-centered planning needs to be conducted in a manner free of conflict of interest?" HCBS providers cannot also perform case management services?"	I (a), paragraph 5	Illinois is required to meet the expectations of federal CMS in regards to the implementation of HCBS settings. Language in the Transition Plan has been added or modified to reflect these strategies.
161	Webinar	Written	DD Provider	General Comment Regarding Statewide Transition Plan and Processes	3	"Can you post a link to the Transition Plan?"	N/A	Illinois is required to meet the expectations of federal CMS in regards to the implementation of HCBS settings. Language in the Transition Plan has been added or modified to reflect these strategies.
162	Webinar	Written	Aging Provider	General Comment Regarding Statewide Transition Plan and Processes	3	"Did we receive a copy of the PowerPoint? Or may we get a copy?"	N/A	These represent questions or comments that do not appear to relate to HCBS settings rules and are not being addressed in the Transition Plan.
163	Webinar	Written	Service Facilitator	General Comment Regarding Statewide Transition Plan and Processes	14	"Service Facilitators do not have access and need access to Community Based Settings/Person-Centered Homes as they become available."	I (a), paragraph 5	Illinois is required to meet the expectations of federal CMS in regards to the implementation of HCBS settings. Language in the Transition Plan has been added or modified to reflect these strategies.
164	Webinar	Written	Provider	General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	"Does this mean that ICP/DD's sixteen beds are not community-based settings"?	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
165	Webinar	Written	Service Facilitator	General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	"How do the new HCBS rules apply to Service Facilitators working in Home-based services?"	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.

166	Webinar	Written	DD Provider	General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	"How should the agency address situations (i.e. access to keys to room doors) in which an individual has a guardian"?	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
167	Webinar	Written	State Staff	Comments or questions regarding issues not related to Transition Plan	3	"I came on late, so I'm sorry if you have already addressed this. "Is the PowerPoint available to us"?"	N/A	These represent questions or comments that do not appear to relate to HCBS settings rules and are not being addressed in the Transition Plan.
168	Webinar	Written	Advocate Agency	Comments or questions regarding issues not related to Transition Plan	3	"I hear a Perkins Braille".	N/A	These represent questions or comments that do not appear to relate to HCBS settings rules and are not being addressed in the Transition Plan.
169	Webinar	Written	Advocacy Association	Current Service Options/Definitions need to be reviewed and/or expanded under existing HCBS waivers and align with CMS regulations	4	"I realize that we all mean slightly different nuances when we say Person-Centered Planning...I would like to hear more about what exactly we mean when we say PCP, to make sure we are all in alignment on the basics".	441.304(d) - (f)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and the definitions of these services comport with the rules. Language in the Transition Plan has been added or modified to reflect these strategies.
170	Webinar	Written	Healthcare Consulting Firm	Process needs to be more defined regarding review of state statutes, policies and procedures to ensure compliance	7	I understand that the 1915C waivers must reflect compliance with the rules when they are submitted or at renewal. Can you please explain what regulatory or legislative change must be in place"?	441.304(d) - (f)	State will utilize existing stakeholder groups to help review state statutes, policies and procedures to ensure compliance. Language in the Transition Plan has been added or modified to reflect these strategies.
171	Webinar	Written	Provider	General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	"Is a Supportive Living Facility (SLF) part of this"?	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.

172	Webinar	Written	Provider	General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	"Is the transition plan just required when someone is moving from one setting to another"?	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
173	Webinar	Written	Provider	General comment or question regarding HCBS settings rules and need to be addressed through continuing education	4	"Please Consider the current role of Service Facilitation in the DD/HBSS waivers as they are critical to the supports these individuals receive...Will the menu of services covered by the waiver change as part of this plan? I am specifically referring to the DD Waiver Program"	441.304(d) - (f)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and the definitions of these services comport with the rules. Language in the Transition Plan has been added or modified to reflect these strategies.
174	Webinar	Written	DD Provider	Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"Please define heightened scrutiny - what does that mean in terms of how frequently during a one year period can either the state or Feds come in and survey an agency".	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
175	Webinar	Written	Advocacy Agency	General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	"Will this transition plan affect ICF/DD housing? If so, how? Also, how will it affect Day Training Programs?"	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
176	Webinar	Written	Provider	General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	"What about Home Based Service Facilitation? How will it differ from BQM, DHS and IDPH site visits?"	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.

177	Webinar	Written	Provider	Comments or questions regarding issues not related to Transition Plan	3	Is this presentation a continuity of the 1115 waiver path to transformation? Where are we with the 1115 waiver process when it comes to the new administration?	N/A	These represent questions or comments that do not appear to relate to HCBS settings rules and are not being addressed in the Transition Plan.
178	Webinar	Written	Provider	General Comment Regarding Statewide Transition Plan and Processes	14	"Will these slides be E-mailed?"	I (a), paragraph 5	Illinois is required to meet the expectations of federal CMS in regards to the implementation of HCBS settings. Language in the Transition Plan has been added or modified to reflect these strategies.
179	Webinar	Written	Provider	General comment or question regarding HCBS settings rules and need to be addressed through continuing education	6	"Will this transition plan effect IC/DD housing? If so, how? Also will it affect Day Training?"	441.730(c)	Continued education is needed at all levels of Transition Plan implementation and will be a key component as we include stakeholders in review of state statutes, policies and procedures and at site visits. Language in the Transition Plan has been added or modified to reflect these strategies.
180	Webinar	Written	Provider	General Comment Regarding Statewide Transition Plan and Processes	14	"Will we get electronic copies of the PowerPoint?"	I (a), paragraph 5	Illinois is required to meet the expectations of federal CMS in regards to the implementation of HCBS settings. Language in the Transition Plan has been added or modified to reflect these strategies.
181	Webinar	Written	Pro	General Comment Regarding Statewide Transition Plan and Processes	14	"Will we get notification if and when our site will be visited?"	I (a), paragraph 5	Illinois is required to meet the expectations of federal CMS in regards to the implementation of HCBS settings. Language in the Transition Plan has been added or modified to reflect these strategies.
182	Webinar	Written	Provider	General Comment Regarding Statewide Transition Plan and Processes	14	"Will you be having additional webinar sessions to update providers on the process?"	I (a), paragraph 5	Illinois is required to meet the expectations of federal CMS in regards to the implementation of HCBS settings. Language in the Transition Plan has been added or modified to reflect these strategies.

183	E-mail	Written	Family of DD Participant	Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"I also want campus settings, like the one so many have worked so hard to achieve, at Misericordia to be considered to meet HCBS criteria that I believe further increase choice and opportunities for people with developmental disabilities."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
				Current Service Options/Definitions need to be reviewed and/or expanded under existing HCBS waivers and align with CMS regulations	4	"I do not want the State to become more restrictive in its definition of "home and community" approved settings that I believe has the impact of denying further choice for the residents."	441.304(d) - (f)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
184	E-mail	Written	Parent of a DD Participant	Rules may not recognize the value of a particular setting in terms of impact and support to specific populations	11	"Campus settings such as the one at Misericordia is appropriate to meet HCBS criteria for it increases choice for the developmentally disabled. Protected by the Americans with Disabilities Act, Developmental Disabilities Bill of Rights and the Olmstead Decision that the disabled have the human right and civil right to choose important aspects in their lives."	441.301(4)(i)	State plans to utilize an array of strategies which include focus groups with stakeholder groups as part of the site/setting validation visits and/or recommend a setting as part of the heightened scrutiny process. Language in the Transition Plan has been added or modified to reflect these strategies.
				Current Service Options/Definitions need to be reviewed and/or expanded under existing HCBS waivers and align with CMS regulations	4	"The definition of "home & community" approved settings must not become more restrictive. This will impact the residents power to choose; i.e. where they live, where they work, etc."	441.304(d) - (f)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.

185	E-mail	Written	Parent of a DD Participant	Assurance of available service options to enable participant choice and integration in the greater community	1	"I wanted to express concern about the new regulations for Home and Community Based Services; we feel that the regulations will increase costs and limit the opportunities that my daughter currently enjoys."	441.301(4)(i)	Over the next four years, all new and renewed waivers will be reviewed to ensure service options are available in integrated settings that support access to the greater community and Person Centered Planning (PCP) is assured; PCP will need to comport with federal setting expectations. Language in the Transition Plan has been added or modified to reflect these strategies.
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