

Status of/Updates to Illinois Statewide Transition Plan (STP) Posted on 2/5/2020

Updated Initial STP draft to be submitted to CMS by COB Friday 1/29/2020

General

- Activity timelines updated in HCBS Waiver System Remediation Grid Appendices, based on OA feedback re: further developments in aligning rules, policies, forms and training with federal person centered planning and settings requirements; corresponding changes made to Appendix that lists major rule, policy and form changes for each OA.
- Heightened Scrutiny Appendix updated to note sites which have either closed or withdrawn from their respective waiver program since 2/5/2020.
- New Appendix added - HFS public notice of webinar presentations for STP posted 2/5/2020
- Updates to year references, other minor changes made to Executive Summary narrative.
- Several historical appendices will be moved to the Illinois STP webpage. Hyperlinks to them will be sent to CMS when they become available, as well as added to the STP document.

Public Comments

- Total of 274 written and verbal (town hall, webinar) comment submissions received in response to the STP posted 2/5/2020 - **almost all related to services for individuals with I/DD.**
- Comments organized into 13 topic categories, with multiple themes (or sub-categories) under each category in order to further examine concerns from commenters. Also addresses CMS' previous feedback that Illinois' previous use of general categories was insufficient.
- Data tables developed based on commenter demographics and added to STP as new appendices, with references to data incorporated into Executive Summary.
 - Type of commenter- self-advocate, provider, parent, etc - **109 or 39.8%** are parents, **72 or 26.3%** are self-advocates, **31 or 11.3%** identified as supporters, **21 or 7.7%** are provider entities
 - Physical location (county) of commenter if noted – **87 or 31.8%** are unspecified
 - Type of consumer living type, if applicable – family home, CILA, etc. - **79 or 28.8%** are living in family homes, **48 or 17.5%** are living in CILAs
Organizations and commenters who did not indicate they have a family member with I/DD were noted as N/A (67 or 24.5%). Commenters who have a family member with I/DD but did not indicate where the member was living noted as Unspecified (64 or 23.4%).
 - Top 10 themes based on number of commenters
 - **#1 Theme from 116 or 42.3%**
4A - Supports Individuals being able to make choices for their own lives: where to live, with whom; Supports individuals' rights to having own bedroom/ apartment/home.
 - **#10 Theme from 56 or 20.4%**
9C - Need more funding for community integration services and inclusive community living: services; staffing levels sufficient to enable individualized choices and provide more individualized support; and increased reimbursement for transportation.

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A commenter recommended replacing the standard monthly maximum for transportation with a model that takes into account the hours of support being provided, the range of activities an individual is engaged in, etc.

DD Division Action Plan Updates

- Action Plan located towards end of Executive Summary narrative. “High level” revisions made to reflect six areas in State Responses to Public Comments where DDD noted modifications to the STP are required. Language from State Responses incorporated to reflect:
- Language was added to the DDD plan portion of the STP to reflect:
 - Guidehouse Rate Study Report now final, noted that it outlines new services and service rates and will inform necessary changes to both rates and policy.
 - DDD to further assess the system to understand ways in which it can support expansion of smaller settings and supportive living.
 - Information added regarding current status/activities for DDD’s employment expansion and supportive living initiatives.
 - DDD to issue an Information Bulletin directing all providers to implement leases and/or rental agreement for all provider-controlled sites.
 - Reference added from recent CMS guidance (per SMD #20-003) noting States may submit to CMS isolating settings that have not completed necessary remediation for a heightened scrutiny review no later than 10/31/2021.
 - DDD’s collaborative efforts with ICDD and DDAC in developing a self-advocate survey
 - DDD’s upcoming review of its Discovery Tool and Personal Planning Process, including a survey of ISCs and providers and creation of documentation processes for ISCs to ensure progress towards outcomes. ISCs and providers will receive training on the new, updated process.

Other Points of Reference

- HFS Waiver Unit staff met with CMS staff on 01/15/2021. CMS agreed with HFS’ proposal to submit to CMS by January 29, 2021 the initial STP with high level modifications based on state responses to public comments, with the understandings that:
 - The revised Initial STP would not be posted for public comment until after federal review and feedback;
 - Additional work will be done by HFS in conjunction with OAs to bring Illinois into compliance by March 17, 2023.
 - Additional updates are necessary and will be made prior to submission of the Final STP to CMS.

HFS staff also noted to CMS that Illinois would be requesting technical assistance in the future as it moves forward to make sure efforts are in sync with CMS expectations and requirements.