

Dear Teresa Smith,

CMS has reviewed the revised Statewide Transition Plan (STP) that North Carolina sent on October 23, 2015, and appreciates the state's efforts in responding to CMS' feedback and in designing and implementing its transition plan. CMS has a few follow-up questions to clarify some aspects of the state's plan.

1. Please note that foster homes need to be assessed and found to be in compliance, and cannot be treated as family homes.
2. Please clarify who will be receiving the self-assessment data analysis on January 16, 2016 when the analysis "is due" (STP p. 16), and how this step relates to "acceptance of the self-assessment by the PIHP or DMA" (STP p. 12).
3. The state notes that it will monitor provider progress towards compliance at six months, one year, two years, and three years (STP p. 13). Please clarify whether the state will conduct any activities during the 12 months in between reviews to help ensure movement towards the March 2019 compliance deadline.
4. Please provide more information on the state's process for validating provider self-assessments. The STP currently indicates that the state will use the Monitoring Review Process, and e Review tool for validation (STP p. 14-15). However, it is not clear how the tool will be used to verify that the information and responses provided by the providers is accurate and based on an appropriate interpretation of the rules. Will the state use site visits, cross-reference the individual experience surveys to provider's sites and responses, or some other means to provide a secondary source of information to validate the provider-submitted information?
  - Similarly, please provide more information on how the state will ensure that it has identified all sites that may require heightened scrutiny beyond using provider-reported information. Other means of identifying these settings could include using geo-locators or looking at site addresses to see if settings are adjacent to or on the grounds of an institution or are in remote locations.
  - Please also provide more information regarding the web-based e Review tool and how it will be used for assessing services and monitoring compliance.
5. Please provide further clarification related to why the state will only be evaluating 10% of supported employment sites. Is the state already certain that all supported employment sites are fully integrated in the community (like the examples provided)? Does the state have a separate requirement in place which defines supported employment in a way that ensures compliance?
6. Please provide more information on the state's monitoring sample. For example, will the state monitor 10% of providers each year, and how will the 10% sample be determined?
7. Please provide assurances that all beneficiaries will receive at least 60 days' notice before being relocated. The state notes that relocations are expected to be completed by March 2018 (STP p. 14) but provider remediation is also expected to be ongoing until March 2018 (or longer, since the last remediation progress reviews will occur approximately 3 years after the self-assessment data is accepted, i.e. January 16, 2016) (STP p. 16).
8. Please provide a date for when the monitoring process will start, and more information on how the state will use the results from the "My Individual Experience Assessment" in the monitoring process.
9. CMS appreciates that the state clarified that individual survey information will provide insight on specific providers/sites and not merely be used at an aggregate level. However, please note that currently this information is only in the state's response to CMS, not in the revised STP. Please be sure to add this information to the revised STP.

10. Similarly, CMS also appreciates that the state clarified that supported employment services are provided at competitive job sites integrated in the community (for example, a coffee shop, a thrift store, a hospital). Please also clarify whether ALL supported employment sites are as fully integrated into the community as the examples provided are (coffee shop, thrift shop, hospital). Also please note that currently this information is only in the state's response to CMS, not in the revised STP. Please be sure to add this information to the revised STP.

CMS looks forward to reviewing the state's revised STP on March 1, 2016, which should include results of the provider assessment analysis and systemic assessment, after it has been posted for public comment (STP p. 15). In the meantime, please provide the additional information and clarifications in the 11 requests noted above in a response email to CMS (and then add all of the information to the revised STP). If the additional information is not yet available, please include a date for when it will be available and sent to CMS. CMS would also like to have a call to discuss this email and any questions that you may have related to the content.

In addition, CMS has identified the milestones in North Carolina's STP resubmitted on October 23, 2015. To ensure that CMS and the state agree on the milestones, please review the list attached for its accuracy and submit a response within 10 business days of receipt of this email.