

DDRS recently hosted a [training session](#) for approved BDDS providers of Non-Residential Home and Community Based Services on the release of HCBS Non-Residential Site Assessments and the remediation process. This document clarifies some frequently asked questions that have been received and includes some additional helpful tips. While these may not cover every situation, you are encouraged to review the responses for guidance:

### **Non-Residential Remediation Process FAQ's**

How do we know which areas require remediation? Some questions are answered "yes" while others are "no" but they do not seem to align with remediation.

A crosswalk has been developed to assist providers in identification of areas of remediation. The crosswalk identifies answers to questions which will require a response and is posted on the Home and Community-Based Services Final Rule Statewide Transition Plan [web page](#) with other helpful resources.

How should we write our remediation with what is in the assessment?

It's important to note remediation may look different for each provider and setting identified. If an item has been identified as requiring compliance, yet it is felt the information does not paint a complete picture, additional information and explanation clarifying the response and notes pertaining to the assessment should be included within the remediation tool.

Other items may require an update to provider specific policies and procedures to address the non-compliant item and ensure that practices are person-centered, as well as ensuring any individual-specific modifications are addressed and included in an individual's PCISP.

What do I remediate if all my answers are "yes"?

Please refer to the crosswalk to determine which answers require remediation. If a provider feels there are no items requiring remediation, it should be noted in the returned remediation tool through the same process of completion and submission for DDRS review and confirmation.

Did most providers have at least one area requiring remediation?

Yes. Each site visited had at least one area of potential remediation identified. Most can be easily addressed.

Can we submit one remediation tool for multiple sites?

Programmatic changes with multiple activities may be required to achieve compliance. DDRS will accept one provider remediation plan for multiple sites as long as all areas are addressed and it is clearly noted on the remediation tool which sites are included in the remediation plan. Some providers may find it easier to complete a separate remediation tool for each site.

Section 6 (Additional information) is not on the remediation tool. How do we remediate that area?

While section 6 is not listed as a federal requirement and is not addressed in the template, providers can still include these areas within the remediation tool.

I have a specific issue to address about my site assessment. Who do I contact?

All questions regarding the non-residential site assessment process can be sent to [FSSA.DDRShcbs@fssa.IN.gov](mailto:FSSA.DDRShcbs@fssa.IN.gov)

When is my remediation plan due?

Your detailed, proposed plan must be submitted between the dates of November 28th through December 19th, 2018.

When I complete my remediation plan and submit it, how will I know it's received?

When submitting your remediation plan in it may be helpful to use a request delivery receipt option when sending e-mail.

When should I expect to hear from BDDS regarding whether or not my proposed plan was approved?

The current anticipated timeline for responses is February 2019. This timeline is subject to change.

What will BDDS staff do if they have questions regarding my proposed plan?

If BDDS has any questions about the remediation plan, they will respond to the provider to clarify or request additional information. Additions or revisions to the remediation plan may be requested.

#### **Additional Tips:**

- We encourage providers to review the Bureau's two-part session on PCISPs for information and to assist in thinking through and planning potential remediation approaches.
  - Part 1: The HCBS Final Rule and PCISP – How It All Ties Together  
<https://indiana.adobeconnect.com/pnyd47uftvxu/>
  - Part 2: The BDDS Portal and the Development of the PCISP  
<https://indiana.adobeconnect.com/pyc5gu8e9aj1/>
- Ensure your remediation responses are framed in a person-centered perspective. For example, if there are restrictions or limitations in your prevocational setting regarding

lunchtime, do individuals who have special medical, dietary or other needs have accommodations based on their Person Centered Individualized Support Plan (PCISP) and identified risks?

- Use available data (state data, regional data, and your agency's data) to help describe your settings and explain your remediation approach. The provider remediation plan should be written for stakeholders and the public to understand. Remediation plans will be made available to the public.
- You will have opportunities to update or modify your remediation plan if needed – however, please ensure you engage in an adequate review of your remediation and ensure your remediation strategies are appropriately aligned to address the area of remediation. This will assist state staff in reviewing and approving your remediation plan more quickly.
- If a remediation plan area is addressed using policy/policies previously submitted to the state, please refer to the relevant policy/policies by name. Specifying the relevant policies will assist state staff in reviewing and approving your remediation plan more quickly as some providers submitted numerous policies and materials.