

Michigan's Statewide Transition Plan for Home and Community Based Settings

Section 1: Assessment							
Row #	Applicable Waiver(s)	Action Item	Description	Start Date	End Date	Sources	Key Stakeholders
1	All waivers	Review state policies, procedures and standards	Michigan Department of Community Health (MDCH) will review current policies, procedures, standards, and contracts to determine required revisions to adhere to new rule (including credentialing, licensing, training curricula, etc.).	09/01/14	09/30/15	Licensing standards of Adult Foster Care's (AFCs) and Homes for the Aged (HFAs), provider contracts, MI Choice and LOCD policies, provider monitoring protocols	Medical Services Administration (MSA), Behavioral Health Developmental Disability Administration (BHDDA), Licensing and Regulatory Affairs (LARA), Department of Human Services (DHS), Office of Recipient Rights (ORR), waiver providers (includes provider networks), waiver participants, advocacy groups
2	Habilitation Supports Waiver (HSW) and MI Choice Waiver	Align all policies, standards, and requirements with HCBS settings requirements	MDCH will evaluate program policies, standards, and requirements to identify any needed changes for full alignment with HCB settings requirements and identify target dates for necessary revisions.	09/01/14	09/30/15	Licensing standards for residential settings, provider contracts, site review protocols, waiver policies, provider monitoring protocols	MSA, BHDDA, LARA, DHS, ORR, waiver providers, waiver participants, advocacy groups
3	Children with Serious Emotional Disturbances (SEDW) and the Children's Waiver Program (CWP)	Align all policies, standards, and requirements with HCBS settings requirements	MDCH will evaluate program policies, standards, and requirements to identify any needed changes for full alignment with HCBS setting requirements and identify target dates for necessary revisions.	12/1/14	3/1/15	Waiver policies	DCH Federal Compliance Section, BHDDA
4	Children with Serious Emotional Disturbances (SEDW)	Submit SEDW Waiver Amendment	MDCH will submit Waiver amendment to Centers for Medicare and Medicaid Services (CMS) following public comment period on transition plan.	12/30/14	12/30/14	CMS Waiver Document	MDCH Federal Compliance Section, BHDDA, Medical Services Administration (MSA)
5	MI Choice Waiver	Develop MI Choice/statewide assessment tool	MDCH will develop a tool as guided by the CMS Exploratory Questions Tool and vetted by key stakeholders for	01/01/15	03/31/15	CMS Exploratory tool, State developed	MSA, waiver providers, waiver participants, advocacy groups

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			waiver providers to evaluate conformity to and compliance with HCBS rules.				
6	Habilitation Supports Waiver (HSW), Children's Waiver Program (CWP), and the Children with Serious Emotional Disturbances Waiver (SEW)	Develop provider self-assessment tool	BHDDA develops tool, as guided by the CMS Exploratory Questions Tool and vetted by key stakeholders, for providers to evaluate conformity to HCBS rules. An independent organization will be used to validate the results of this survey by on site assessments conducted by trained reviewers. Sampling Methodology: a random proportionate sample of residential and nonresidential services providers, that is statistically significant to the 95% confidence interval. Incorporate assessment tool into provider enrollment policy and contracts. The tool will align with the MI Choice assessment tool.	10/01/14	02/28/15	CMS exploratory tool, state developed assessment tools	MDCH Federal Compliance & Contracts Section, BHDDA, MSA, provider networks, Quality Improvement Council (QIC), waiver participants, advocacy groups
7	Habilitation Supports Waiver (HSW)	Develop beneficiary survey tool	BHDDA with involvement from key stakeholders develops tool, as guided by the CMS Exploratory Questions Tool and vetted by key stakeholders, for HSW participants to evaluate conformity to and compliance with HCBS rules and to represent their experience of the setting. Incorporate assessment tool into provider enrollment policy and contracts.	10/01/14	02/28/15	CMS exploratory tool, state developed assessment tools	MDCH Federal Compliance & Contracts Section, BHDDA, MSA, HSW participants
8	Habilitation Supports Waiver (HSW), Children's Waiver Program (CWP), and	Develop Community Mental Health (CMH)/ Prepaid Inpatient Health Plan (PIHP) survey tool	BHDDA develops tool, as guided by the CMS Exploratory Questions Tool and vetted by key stakeholders, for HSW PIHP coordinators to evaluate conformity to and compliance with HCBS rules. An independent organization will be used to validate the results of this survey by on site	10/01/14	02/28/15	CMS exploratory tool, BHDDA developed assessment tools	MDCH Federal Compliance & Contracts Section, BHDDA, MSA, HSW PIHP coordinators

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Row #	Applicable Waiver(s)	Action Item	Description	Start Date	End Date	Sources	Key Stakeholders
	the Children with Severe Emotional Disturbances Waiver Program (SEDW)		assessments conducted by trained reviewers. Sampling Methodology: a random proportionate sample of residential and nonresidential services providers, that is statistically significant to the 95% confidence interval. Incorporate assessment tool into provider enrollment policy and contracts.				
9	Habilitation Supports Waiver (HSW)	Obtain active list of residential settings	BHDDA identified the types of HSW residential settings that BHDDA can assume complied with HCB settings requirements and those settings which are provider owned or controlled.	08/01/14	08/30/14	Waiver Support Application (WSA) and Data warehouse Residential Living Arrangement (RLA) codes	MDCH Federal Compliance Section, BHDDA, MSA
10	Habilitation Supports Waiver (HSW)	Obtain active list of nonresidential service types	BHDDA identified the types of HSW nonresidential services and the characteristics of the settings.	08/01/14	08/30/14	HCPCS codes of out of home non vocational, pre vocational, and supported employment services billed to HSW	MDCH Federal Compliance Section, BHDDA
11	MI Choice Waiver	Identify all provider controlled and owned residential and nonresidential settings and any individuals who will be affected by changes.	MSA will work with waiver agencies to compile a list of all settings currently used within the MI Choice Waiver.	07/01/14	12/15/14	Waiver agency provider networks	MDCH Medicaid LTC Division: HCBS Section (HCBSS) and LTC Policy section, waiver agencies
12	All waivers	Identify residential and non-residential	MDCH identifies the types of residential and nonresidential settings and the characteristics of the settings.	12/01/14	01/31/15	Waiver agencies, PIHPs, Community Mental Specialty	BHDDA, MSA, DHS, waiver participants, advocacy groups

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Row #	Applicable Waiver(s)	Action Item	Description	Start Date	End Date	Sources	Key Stakeholders
		settings for all (c) waivers	Statewide tool will be used for the assessment.			Health Programs (CMHSPs), and provider networks	
13	Habilitation Supports Waiver (HSW)	Self-assessment	Waiver providers will be required to conduct self- assessments of their settings to determine compliance to new rule or need for corrective action. This will include collecting feedback from participants. BHDDA will oversee the process.	04/01/15	04/30/15	Assessment tool, input from providers	BHDDA, waiver providers, waiver participants, advocacy groups
14	Habilitation Supports Waiver (HSW)	Perform Validity Check	An independent organization will be used to validate the results of this survey by on site assessments conducted by trained reviewers. Sampling Methodology: a random proportionate sample of residential and nonresidential services providers, that is statistically significant to the 95% confidence interval. Incorporate assessment tool into provider enrollment policy and contracts.	07/01/15	08/30/15	CMS exploratory tool and state developed assessment tools	MSA, BHDDA, waiver providers, independent organization
15	Children's Waiver Program (CWP) and the Children with Serious Emotional Disturbances Waiver (SEDW)	Assess settings covered by the waiver	MDCH conducts preliminary assessment of the types of SEDW and CWP residential and nonresidential services and the characteristics of the settings. Review Waiver Support Application demographics data to ensure that all children on the SEDW are living in either their family home, a family foster home or independently with supports. Family homes, including family foster homes, independent living settings (not provider owned or operated) have presumed compliance with the rule.	12/1/14	3/1/15	Review Waiver Support Application demographics data. HCPCS code T2036 for the SEDW	DCH Federal Compliance Section, BHDDA

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Row #	Applicable Waiver(s)	Action Item	Description	Start Date	End Date	Sources	Key Stakeholders
			Review Waiver Support Application demographics data to ensure that all children on the CWP are living in either their family home or with a guardian who is a relative. Family homes have presumed compliance with the rule.				
16	Habilitation Supports Waiver (HSW), Children's Waiver Program (CWP), and Children with Severe Emotional Disturbances Waiver Program (SEDW)	Administration and Completion of Survey tools	BHDDA will select a contractor that will administer and complete the provider, beneficiary, and CMH/PIHP survey tools.	03/01/15	03/31/15	BHDDA developed survey tools	MDCH Federal Compliance & Performance Measurement Section
17	MI Choice Waiver	Have all HCBS settings assessed by waiver agencies	MI Choice waiver agencies contract directly with providers. Waiver agencies will be required to conduct on-site assessments of each provider setting to determine compliance to new rule or need for corrective action. This will include collecting feedback from participants. MSA will oversee the process. Waiver agencies will report this data to MSA. Statewide tool will be used for the assessment.	04/01/15	12/31/2015	Assessment tool, Input from providers	MI Choice waiver agencies, provider network, HCBSS
18	MI Choice	Assessment data is compiled and analyzed	MDCH compiles the data from providers and beneficiaries to determine those HCBS services providers who meet, do not meet, and could come into compliance with	10/01/15	03/31/16	Self-Assessment tool, data analysis	MSA, Waiver Providers, waiver participants and advocacy groups

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Row #	Applicable Waiver(s)	Action Item	Description	Start Date	End Date	Sources	Key Stakeholders
			HCBS guidance.				
19	Habilitation Supports Waiver (HSW)	Assessment data is compiled and analyzed	BHDDA compiles the data from providers, beneficiary, and PIHP HSW coordinators to determine those HCBS services providers who meet, do not meet, and could come into compliance with HCBS guidance.	04/01/15	04/30/15	Self-Assessment tool, SharePoint, data analysis	MDCH Federal Compliance & Contracts Section, BHDDA, MSA, Provider network, QIC
20	Children with Serious Emotional Disturbances (SEDW) and the Children's Waiver Program (CWP)	Assessment data is compiled and analyzed	MDCH compiles the data from providers, beneficiary, and CMHSP SEDW and CWP coordinators to determine those HCBS services providers who meet, do not meet, and could come into compliance with HCBS guidance.	5/1/15	5/30/15	Self-Assessment tool, SharePoint, data analysis	DCH Federal Compliance and contracts Section, BHDDA, MSA, Provider network, QIC
21	Habilitation Supports Waiver (HSW)	Submission of survey results to BHDDA	All active enrolled HCBS provider and HSW PIHP coordinators will submit the assessment tool to BHDDA. HSW enrollees will be given the opportunity to submit the assessment tool, with assistance from their family and other natural supports, to BHDDA however will not be required to do so. Survey will include a prompt to indicate the relationship of the person assisting, as appropriate.	05/01/15	05/30/15	Assessment tool, Provider Network, PIHP HSW coordinators, beneficiary.	MDCH Federal Compliance & Contracts Section, BHDDA, MSA, Provider network, QIC
22	Children with Serious Emotional Disturbances (SEDW) and the Children's Waiver Program (CWP)	Survey results are submitted to DCH	All active enrolled HCBS provider and SEDW CMH coordinators will submit the assessment tool to DCH. SEDW enrollees will be given the opportunity to submit the assessment tool, with assistance from their family and other natural supports, to DCH however will not be required to do so. Survey will include a prompt to indicate the relationship of the person assisting, as	4/1/15	4/30/15	Assessment tool, Provider Network, PIHP HSW coordinators, beneficiary.	DCH Federal Compliance and contracts Section, BHDDA, MSA, Provider network, QIC

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Row #	Applicable Waiver(s)	Action Item	Description	Start Date	End Date	Sources	Key Stakeholders
			appropriate.				
23	All waivers	Review assessed results and report findings to stakeholders	MDCH will present the results of the assessment data to stakeholders and post results for 30 days.	01/01/16	04/30/16	Self-Assessment tool, SharePoint, data analysis	BHDDA, MSA, waiver providers, QIC, waiver participants, advocacy groups
24	Habilitation Supports Waiver (HSW), Children's Waiver Program (CWP), and the Children with Severe Emotional Disturbances Waiver Program (SEDW)	Review assessed results and report findings to stakeholders	BHDDA will present the results of the assessment data to stakeholders and post results on the MDCH website.	06/01/15	06/30/15	Self-Assessment tool, SharePoint, data analysis	MDCH Federal Compliance & Contracts Section, BHDDA, MSA, Provider networks, QIC, waiver participants, PIHPs, advocacy groups
25	All waivers	Revise statewide transition plan if necessary	MDCH will develop a modified statewide Transition Plan informed by the assessment and site survey data which establish a plan for addressing all components of compliance with the HCBS rule.	01/01/16	05/30/16	Assessment results, key stakeholder input results	BHDDA, MSA, Provider network, QIC, advocacy groups, waiver participants
26	Children with Serious Emotional Disturbances (SEDW)	Revise SEDW Transition Plan	MDCH will develop a modified individual Transition Plan informed by the assessment and site survey data which establish a plan for addressing all components of compliance with the HCBS rule.	6/1/15	6/30/15	Assessment results, key stakeholder input results	DCH Federal Compliance and contracts Section, BHDDA, MSA, Provider network, QIC, advocacy groups.

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Section 2: Remediation							
Row #	Applicable Waiver(s)	Action Item	Description	Start Date	End Date	Sources	Key Stakeholders
27	Children with Serious Emotional Disturbances (SEDW)	Submit Waiver Plan Amendment to CMS	MDCH will submit a waiver amendment that outlines settings which meet HCBS characteristics and settings which currently do not meet HCBS characteristics but may. The state will design remediation strategies for those HCBS providers not in compliance (but may) with HCBS rules. This amendment will include assessment results and will indicate significant milestones on remediation and a timeline. Settings presumed not to meet HCBS requirements will be identified however the state does not intend to submit a plan to provide evidence that these settings comport to the rule.	6/1/15	6/30/15	CMS HCBS guidelines	BHDDA, MSA, PIHP, CMH, Advocates, DHS, LARA, ORR
28	MI Choice Waiver and Habilitation Supports Waiver (HSW)	Design statewide remediation strategy	MDCH will design a remedial strategy for settings found to be noncompliant.	12/01/15	06/30/16	CMS HCBS guidelines	BHDDA, MSA, Waiver Providers, Advocates, DHS, LARA, ORR, Waiver participants, advocacy groups
29	Children with Serious Emotional Disturbances (SEDW) and the Children's Waiver Program (CWP)	Design Remedial Strategy	MDCH will design a remedial strategy for settings found to be noncompliant. The strategy will include the remediation process to include education and outreach in the form of site surveys, technical assistance and consultation, and corrective action plans. The state will include in this process, modifications of relevant policies, laws, or regulations or assisting transfers to acceptable settings.	10/1/15	3/1/19	CMS HCBS guidelines	BHDDA, MSA, Providers, beneficiaries, PIHP, CMH, Advocates, DHS, LARA, ORR
30	All waivers	Develop a list of	MDCH will develop a list of those	12/01/2014	05/31/2016	CMS HCBS	BHDDA, MSA, Waiver

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Section 2: Remediation							
Row #	Applicable Waiver(s)	Action Item	Description	Start Date	End Date	Sources	Key Stakeholders
		settings based upon current compliance status	settings that are: <ul style="list-style-type: none"> • assumed to be in compliance • out of compliance (but may come into compliance) 			guidelines	Providers, Advocates, DHS, LARA, ORR, Waiver participants, advocacy groups
31	MI Choice and Habilitation Supports Waiver (HSW)	Update MDCH policies, procedures, standards, contracts as necessary	MDCH will develop and adopt revised policies, procedures, standards, and contracts to address ongoing compliance and monitoring, including adding requirement of using assessment tool as part of provider monitoring, self-assessment, survey tools as well as the site review protocols. Includes legislation, administrative rules and contracting procedures.	10/01/15	03/01/17	MDCH staff, DHS, waiver policy, provider contracts, monitoring tool	MSA, BHDDA, LARA, MDCH Federal Compliance & Contracts Section, QIC, waiver providers, waiver participants, advocacy groups
32	Children with Serious Emotional Disturbances (SEDW) and the Children's Waiver Program (CWP)	Policy Development	MDCH will revise policies and procedures as needed to address ongoing monitoring and compliance including the self-assessment and survey tools as well as the site review protocols.	10/1/15	3/1/16	DCH and DHS	DCH Federal Compliance and contracts Section, BHDDA, MSA, Provider network, QIC, advocacy groups.
33	All waivers	Educate on HCB Settings providers	MDCH will include language in the contracts of waiver providers to ensure that all new providers are assessed for HCB settings prior to providing services. Upon enrollment in the waiver program, providers who provide HCBS will be provided technical assistance on HCB setting requirement by MDCH, PIHPs and waiver agencies.	01/01/15	03/17/19	Provider monitoring tool and instructions	MSA, BHDDA, waiver providers, provider networks, waiver participants, advocacy groups
34	All waivers	Notify providers who do not and	MDCH will notify providers who are found to not meet and are unable to	06/01/16	12/31/16	Assessment tool responses	MSA, BHDDA waiver providers, participants, advocacy groups

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Row #	Applicable Waiver(s)	Action Item	Description	Start Date	End Date	Sources	Key Stakeholders
		cannot meet the HCB setting requirements. Notify any affected participants of these providers.	meet the Federal requirements. These providers will be removed from the program. Participants will also be notified that their provider cannot meet requirements.				
35	All waivers	Develop corrective action plans for individual non-compliant settings	MDCH/BHDDA will design a remedial strategy for settings found to be noncompliant. The strategy includes education and outreach in the form of site surveys, technical assistance and consultation, and corrective action plans. MDCH will include in this process, modifications of relevant policies, laws, or regulations or assisting transfers to acceptable settings.	9/30/16	2/28/18	CMS HCBS guidelines	BHDDA, MSA, waiver providers, waiver participants, advocates, DHS, LARA, ORR
36	All waivers	Remediate Individual Provider Settings	Providers will be required to submit periodic status updates on remediation progress to MDCH. MDCH will allow reasonable timeframes for large infrastructure changes with the condition that the providers receive department approval and provide timely progress reports on a regular basis. Updates provided to CMS as needed.	10/01/15	03/17/19	Revised policies and procedures, remediation plans	MSA, BHDDA, waiver providers, CMS, waiver participants, advocacy groups
37	All waivers	Notify CMS of any presumptively non-home and community-based settings that do have qualities of home and community-based	MDCH will compile a list of presumptively non-home and community-based settings that do not have the characteristics of an institution and do have the qualities of home and community-based settings and submit to CMS.	06/01/16	12/31/16	Assessment tool responses	HCBS, waiver agencies, provider network, CMS

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Section 2: Remediation							
Row #	Applicable Waiver(s)	Action Item	Description	Start Date	End Date	Sources	Key Stakeholders
		settings for heightened scrutiny					
38	All waivers	Implement corrective action plans for Individual non-compliant Provider Settings	MDCH and its contractors will ensure Individual Provider Settings become compliant with new rule. For those providers who do not comply with the Federal requirements and will require modifications, providers will self-disclose remediation plans or state will preset remediation requirements for each organization's HCB settings.	9/30/16	2/28/18	Revised policies and procedures	MSA, BHDDA, waiver providers, CMS, waiver participants, advocacy groups
39	All waivers	Transition of participants in noncompliant settings	MDCH will provide choice to participants in provider controlled and owned residential settings to transition to a new residential or non-residential setting that meets requirement or disenroll from the waiver program.	01/01/16	9/30/18	Provider network listings, assessment data	MSA, BHDDA, Participants, advocacy groups
40	All waivers	Ongoing monitoring of compliance	MDCH will incorporate HCB settings requirements into quality reviews, provider monitoring, and consumer satisfaction surveys to identify areas of non-compliance.	10/01/15	03/17/19		MSA, BHDDA waiver providers, provider networks, participants, advocacy groups
41	Habilitation Supports Waiver (HSW)	BHDDA site review team will assess for ongoing compliance of HCBS settings in residential and nonresidential settings	Amend BHDDA site review team protocols to include a review of HCBS characteristics in HSW residential and non-residential settings.	10/01/15	03/01/19	Site Review protocols	MDCH Federal Compliance and contracts Section, BHDDA, MSA, Provider, QIC
42	Children with Serious Emotional Disturbances (SEDW) and	MDCH site review team will assess for ongoing compliance of	Amend MDCH site review team protocols to include a review of HCBS characteristics in residential and non-residential settings.	10/1/15	3/1/19	Site Review protocols	DCH Federal Compliance and contracts Section, BHDDA, MSA, Provider, QIC

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Row #	Applicable Waiver(s)	Action Item	Description	Start Date	End Date	Sources	Key Stakeholders
	the Children's Waiver Program (CWP)	HCBS settings in residential and non-residential settings					
43	All waivers	Develop statewide protocols for site specific reviews	MDCH will develop protocols to address ongoing monitoring and compliance.	10/01/15	09/30/16	MDCH and DHS	BHDDA, MSA, Provider network, QIC, advocacy groups, participants

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Section 3: Outreach and Engagement							
Row #	Applicable waivers	Action Item	Description	Start Date	End Date	Sources	Key Stakeholders
44	All waivers	Hold stakeholder meetings to develop and inform Statewide Transition Plan	MDCH hosted several meetings to share information across programs, gather stakeholder concerns, and incorporate them into our Statewide Transition Plan.	8/12/14	11/13/14	CMS written guidance, MDCH staff, data analysis	MSA, BHDDA, waiver providers, waiver participants, advocacy groups
45	All waivers	Create and distribute public notice for Statewide Transition Plan	MDCH will notify stakeholders that a draft transition plan has been developed to address new rule and will include links to the full plan and the waiver amendment document. Notices include MDCH website posting, newspapers, and mailings.	11/21/14	12/22/14	Draft transition plan, waiver amendment document, MDCH website, policy, stakeholder letter, newspaper	Waiver providers, MSA, BHDDA, waiver participants, advocacy groups
46	All waivers	Collect and distribute public comment to stakeholders	MDCH will collect public comments on the draft transition plan through multiple methods including e-mail, US mail and stakeholder meetings. MDCH will make appropriate changes to the plan and will post comments and responses on the MDCH website.	11/21/14	12/29/14	E-mail comments, US mail, meeting minutes, MDCH website.	Waiver providers, MSA, BHDDA, waiver participants, advocacy groups
47	All waivers	Revise Transition Plan and post on MDCH website	MDCH will incorporate appropriate changes to Transition Plan based on public comments and post rationale for substantive change to the plan. The plan and comments will be available on the MDCH website.	12/22/14	01/16/15	Draft transition plan, modified transition plan, public comments notes, and responses, MDCH website.	MSA, BHDDA, waiver providers, waiver participants, advocacy groups
48	All waivers	Submit initial Transition Plan for approval	MDCH will submit the initial Transition Plan and summary of comments to CMS for approval.	01/16/15	01/16/15	Draft Transition Plan and comments from public	MSA, BHDDA, and CMS