

Michigan Home and Community Based Services (HCBS) Transition Plan – Waiver for Children with Serious Emotional Disturbance (SEDW)

Section 1: Assessment					
<i>Action Item</i>	<i>Description</i>	<i>Start Date</i>	<i>End Date</i>	<i>Sources</i>	<i>Key Stakeholders</i>
Align all policies, standards, and requirements with HCBS settings requirements	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		DCH Federal Compliance Section, BHDDA
Submit SEDW Waiver Amendment	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	DCH Federal Compliance Section, BHDDA, Medical Services Administration (MSA)
Assess settings covered by the waiver	State of Michigan conducts preliminary assessment of the types of SEDW 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. HCPC code T2036.	DCH Federal Compliance Section, BHDDA
Develop provider self-assessment tool	State of Michigan 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	10/1/14	2/28/15	CMS exploratory tool, state developed assessment tools	DCH Federal Compliance and contracts Section, BHDDA, MSA, Provider network, Quality Improvement Council (QIC)

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	enrollment policy and contracts.				
Develop Community Mental Health (CMH)/ survey tool	State of Michigan develops tool, as guided by the CMS Exploratory Questions Tool and vetted by key stakeholders, for SEDW CMHSP 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 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.	10/1/14	2/28/15	CMS exploratory tool, state developed assessment tools	DCH Federal Compliance and contracts Section, BHDDA, MSA, SEDW PIHP coordinators
Survey tools will be administered and completed.	Provider, beneficiary, and CMH/ survey tools will be administered and completed.	3/1/15	3/31/15	State developed survey tools	DCH Federal Compliance and Performance Measurement Section

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Action Item	Description	Start Date	End Date	Sources	Key Stakeholders
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 appropriate.	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
Assessment data is compiled and analyzed	DCH compiles the data from providers, beneficiary, and CMHSP SEDW 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
Assessment results and report	DCH will present the results of the assessment data to stakeholders and post results.	6/1/15	6/30/15	Self-Assessment tool, SharePoint, data analysis	DCH Federal Compliance and contracts Section, BHDDA, MSA, Provider network, QIC
SEDW Transition Plan	Develop a modified 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

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					groups.
Section 2: Remediation					
Action Item	Description	Start Date	End Date	Sources	Key Stakeholders
Submit Waiver Plan Amendment to CMS	State 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
Design Remedial Strategy	State 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
Policy Development	State 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	3/1/15	DCH and DHS	DCH Federal Compliance and contracts Section, BHDDA, MSA, Provider network, QIC, advocacy groups.
DCH site review team will assess for ongoing compliance of HCBS settings in residential and non-residential settings	Amend DCH site review team protocols to include a review of HCBS characteristics in HSW 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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Section 3: Outreach and Engagement					
Action Item	Description	Start Date	End Date	Sources	Key Stakeholders
Initial Transition Plan Developed	Immediate Stakeholder input gathered	11/24/14	12/24/14	Advocates, General stakeholder meeting	DCH, PIHP, CMH, Advocates, enrollees
Public Notice-Assessment Plan Review	DCH makes public notice calling for comment on the HSW transition plan	11/24/14	12/24/14	HCBS Transition Plan	DCH, PIHP, CMH, Advocates, enrollees
Incorporate Public comments-Transition Plan	DCH will collect public comment through dedicated email address, in person, or via fax.	11/24/14	12/24/14	Dedicated email box	DCH
Public Comment-collection and plan revisions	DCH incorporates appropriate changes to Transition Plan based on public comments.	11/24/14	12/24/14	Transition Plan, Public Comments	DCH
Public Comment-Ongoing Input	DCH will utilize various stakeholder groups to regularly present and partner with to inform a comprehensive Transition Plan in preparation for Waiver Amendment/Renewal in 2015.	10/1/14	6/30/15	Transition Plan, Public Comments	DCH, PIHP, CMH, Advocates, enrollees
Provider Education	Design and implement training and education on HCBS rule	11/1/14	6/30/15	DCH	Provider entities