

## Michigan Home and Community Based Services (HCBS) Transition Plan – Habilitation Supports Waiver (HSW)

<b>Section 1: Assessment</b>					
<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 settings requirements and identify target dates for necessary revisions.	9/1/14	3/1/15	Licensing standards of Adult Foster Care's (AFC), Provider contract, site review protocols	Department of Human Services (DHS), Licensing and Regulatory Affairs (LARA), Office of Recipient Rights (ORR)
Obtain active list of residential settings	Behavioral Health and Developmental Disabilities Administration (BHDDA) conducts preliminary assessment of the types of HSW residential settings that Michigan Department of Community Health (MDCH) - Behavioral Health and Developmental Disabilities Administration (BHDDA) can assume complies with CMS HCBS settings requirements and those settings which are provider owned or controlled.  During the preliminary assessment, DCH draws a random proportionate sample that is statistically significant to the 95% confidence level from the participants who live in provider owned and controlled settings. The sample will be used for disseminating the PIHP, provider and beneficiary surveys that are described in item 5-7 of the Assessment section of the transition plan.	8/1/14	8/30/14	Waiver Support Application (WSA) and Data warehouse Residential Living Arrangement (RLA) codes	DCH Federal Compliance Section, BHDDA
Obtain active list of nonresidential service types	BHDDA conducts preliminary assessment of the types of HSW nonresidential services and the characteristics of the settings.  During the preliminary assessment, DCH draws a random proportionate sample that is statistically significant to the 95% confidence level from the participants who received non-residential services. The sample will be used for disseminating the PIHP, provider and beneficiary surveys that are described in item 5-7 of the Assessment	8/1/14	8/30/14	Healthcare Common Procedure Coding System (HCPCS) codes of out of home non vocational, pre vocational, and supported employment services billed to HSW	DCH Federal Compliance Section, BHDDA

## Michigan Home and Community Based Services (HCBS) Transition Plan – Habilitation Supports Waiver (HSW)

	section of the transition plan.				
Submit HSW Waiver Amendment	Submit Waiver amendment to Centers for Medicare and Medicaid Services (CMS) following public comment period on transition plan.	9/30/14	9/30/14	CMS Waiver document	DCH Federal Compliance Section, BHDDA, Medical Services Administration (MSA)
Develop provider self-assessment tool	Developmental Disabilities Institute (DDI), as an independent organization, develops tool as guided by the CMS Exploratory Questions Tool and vetted by key stakeholders, for providers to evaluate conformity to HCBS rules. The self-assessment tool will be sent to the providers of the HSW participants that were chosen in the random sample selection (the sampling methodology is described in item2 and item3 of the Assessment Section). DDI will validate the results of this survey by on site assessments conducted by trained reviewers. 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, Provider network, Quality Improvement Council (QIC), DDI
Develop beneficiary survey tool	DDI, as an independent organization, develops tool as guided by the CMS Exploratory Questions Tool and vetted by key stakeholders, for HSW beneficiaries to evaluate conformity to and compliance with HCBS rules and to represent their experience of the setting. The beneficiary survey tool will be sent to the HSW participants that were chosen in the random sample selection (the sampling methodology is described in item2 and item3 of the Assessment Section). DDI will validate the results of this survey by on site assessments conducted by trained reviewers. 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, HSW beneficiary, DDI.
Develop Community Mental Health (CMH)/ Prepaid Inpatient Health Plan (PIHP) survey tool	DDI, as an independent organization, 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. The CMH/PIHP survey tool will be sent to all PIHPs of the HSW	10/1/14	2/28/15	CMS exploratory tool, state developed assessment tools	DCH Federal Compliance and contracts Section, BHDDA, MSA, HSW PIHP coordinators, DDI.

## Michigan Home and Community Based Services (HCBS) Transition Plan – Habilitation Supports Waiver (HSW)

---

	<p>participants that were chosen in the random sample selection (the sampling methodology is described in item2 and item3 of the Assessment Section). DDI will validate the results of this survey by on site assessments conducted by trained reviewers. Incorporate assessment tool into provider enrollment policy and contracts.</p>				
<p>Survey tools will be administered and completed.</p>	<p>Provider, beneficiary, and CMHSP/PIHP survey tools will be administered and completed.</p>	<p>3/1/15</p>	<p>3/31/15</p>	<p>State developed survey tools</p>	<p>DCH Federal Compliance and Performance Measurement Section</p>

## Michigan Home and Community Based Services (HCBS) Transition Plan – Habilitation Supports Waiver (HSW)

Action Item	Description	Start Date	End Date	Sources	Key Stakeholders
Survey results are submitted to DCH	All active enrolled HCBS provider and HSW PIHP coordinators will submit the assessment tool to MDCH. HSW enrollees will be given the opportunity to submit the assessment tool, with assistance from their family and other natural supports, to MDCH 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	MDCH 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.	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	MDCH 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
HSW Transition Plan	BHDDA will 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 groups.

## Michigan Home and Community Based Services (HCBS) Transition Plan – Habilitation Supports Waiver (HSW)

<b>Section 2: Remediation</b>					
Action Item	Description	Start Date	End Date	Sources	Key Stakeholders
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.	6/30/15	6/30/15	CMS HCBS guidelines	BHDDA, MSA, PIHP, CMH, Advocates, DHS, LARA, ORR
Design Remedial Strategy	BHDDA will design a remedial strategy for settings found to be noncompliant. The remedial strategy steps will include:	10/1/15	12/31/17	CMS HCBS guidelines	BHDDA, MSA, Providers, beneficiaries, PIHP, CMH, Advocates, DHS, LARA, ORR
	<ul style="list-style-type: none"> <li>BHDDA will develop a list of those settings that are assumed compliance, out of compliance (but may), and presumed not to meet HCBS rules and submit to CMS.</li> </ul>	6/1/15	6/30/15		
	<ul style="list-style-type: none"> <li>The state will include in this process, modifications of relevant policies, laws, or regulations or assisting transfers to acceptable settings.</li> </ul>	10/1/15	3/1/16		
	<ul style="list-style-type: none"> <li>For those settings that are out of compliance (but may), remediation will be initiated which will include education and outreach in the form of site surveys, technical assistance and consultation, and corrective action plans.</li> </ul>	6/1/15	12/31/17		
	<ul style="list-style-type: none"> <li>For those settings that are presumed not to meet HCBS requirements, the state does not intend to submit a plan to provide evidence that these settings comport to the rule.                             <ul style="list-style-type: none"> <li>If an HSW participant already residing in the settings that are presumed not to meet HCBS requirements, the PIHP, the participant and his/her representative will develop a transition plan to move to a setting that is in compliance with the HCBS</li> </ul> </li> </ul>	6/1/15	12/31/15		

## Michigan Home and Community Based Services (HCBS) Transition Plan – Habilitation Supports Waiver (HSW)

---

	<p>requirements.</p> <ul style="list-style-type: none"> <li>- Any new HSW applicant living in a setting that is presumed not to meet HCBS requirements must have a transition plan in place that assures the participant will move to a setting that is in compliance with the HCBS requirements. If there is no transition plan, the first step in the process is to pend the application and request additional information about a transition plan.</li> </ul>	6/1/15	12/31/15		
Policy Development	BHDDA will revise policies and procedures as needed to address ongoing monitoring and compliance, as well as transition plans for all settings that are not in compliance (but may) with the rules, including the self-assessment and survey tools as well as the site review protocols.	10/1/15	3/1/17	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 MDCH 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

## Michigan Home and Community Based Services (HCBS) Transition Plan – Habilitation Supports Waiver (HSW)

<b>Section 3: Outreach and Engagement</b>					
Action Item	Description	Start Date	End Date	Sources	Key Stakeholders
Initial Transition Plan Developed	Immediate Stakeholder input gathered by BHDDA	8/1/14	9/30/14	Advocates, General stakeholder meeting	DCH, PIHP, CMH, Advocates, enrollees
Public Notice-Assessment Plan Review	MDCH makes public notice calling for comment on the HSW transition plan. The amendment and transition plan were published in major newspapers, DCH website, twitter and Facebook. DCH also sent out L letters to all PIHPs.	8/25/14	9/25/14	HCBS Transition Plan	DCH, PIHP, CMH, Advocates, enrollees
Incorporate Public comments-Transition Plan	MDCH will collect public comment through dedicated email address, in person, or via fax.	8/25/14	9/25/14	Dedicated HSW email box	DCH
Public Comment-collection and plan revisions	MDCH incorporates appropriate changes to Transition Plan based on public comments.	9/26/14	9/28/14	Transition Plan, Public Comments	DCH
Public Comment-Ongoing Input	MDCH 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
Stakeholder education	BHDDA will conduct training for individual enrollees of HSW, their circle of support on HCBS rule and impact on their services. Ongoing education for new enrollees and their circle of support will be made available by the appropriate PIHP.	11/1/14	6/30/15	DCH	HSW enrollees and circle of support
Provider Education	BHDDA will design and implement training and education on HCBS rule	11/1/14	6/30/15	DCH	Provider entities