

Michigan Home and Community-Based (HCB) Settings Transition Plan – MI Choice Waiver

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>
Identify all provider controlled and owned residential and non-residential settings and any individuals who will be affected by changes.	MDCH will work with MI Choice waiver agencies (PAHPs) to compile a list of all settings currently used within the MI Choice waiver.	7/1/2014	11/30/2014	Waiver agency provider networks, waiver agency participant lists	MDCH Medicaid LTC Division: HCBSS Section (HCBSS) and LTC Policy section, MI Choice waiver agencies
Review state policies, procedures and standards	State will review current policies, procedures, standards and contracts to determine required revisions to adhere to new rule (including credentialing, licensing, training curricula, etc). Stakeholder review and input will also be included in this step.	9/1/2014	12/31/2014	Licensing standards of AFCs and HFAs, provider contracts, MI Choice and LOCD policies, provider monitoring protocols	HCBSS, LTC Policy, LARA, MI Choice waiver agencies, provider network, MI Choice participants, Quality Management Collaborative (including participant representatives from both the aging and disabled populations)
Submit MI Choice Waiver Amendment	Submit Waiver Amendment and modified transition plan to CMS following public comment period.	9/30/2014	9/30/2014	CMS Waiver Document, HCB Settings Transition Plan	HCBSS, LTC Policy, MI Choice waiver agencies, provider network, Quality Management Collaborative, MI Choice participants
Develop statewide assessment tool	MDCH will develop a tool as guided by the CMS Exploratory Questions Tool and vetted by key stakeholders	10/1/2014	11/30/2014	CMS Exploratory tool, state developed	HCBSS, LTC Policy, MI Choice waiver agencies, Quality

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	for MI Choice waiver agencies to evaluate conformity to and compliance with HCBS rules.			assessment tools	Management Collaborative
Have all HCBS settings assessed by MI Choice 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. MDCH will oversee the process. Waiver agencies will report this data to MDCH.	10/1/2014	9/30/2015	Assessment tool, Input from providers	MI Choice waiver agencies, provider network, HCBSS

Section 2: Remediation					
<i>Action Item</i>	<i>Description</i>	<i>Start Date</i>	<i>End Date</i>	<i>Sources</i>	<i>Key Stakeholders</i>
Update state policies, procedures, standards, contracts as necessary	State 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.	1/1/2015	6/30/2015	MDCH staff, MI Choice policy, MI Choice contracts, Monitoring tool	LARA, MI Choice waiver agencies, provider network, LTC Policy, HCBSS
Incorporate Education Compliance Understanding into Provider Enrollment	Require waiver agencies, in contract, to ensure that all new providers are assessed for HCB settings prior to providing services. When agencies enroll to provide HCBS, they will be provided technical assistance on HCB setting requirements.	1/1/2015	6/30/2015	Provider monitoring tool and instructions	HCBSS, MI Choice waiver agencies, provider network
Ongoing monitoring of compliance	MDCH will incorporate HCB settings requirements into quality reviews,	1/1/2015	6/30/2015	Administrative Quality Assurance	HCBSS, MI Choice waiver agencies,

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	provider monitoring, and consumer satisfaction surveys to identify areas of non-compliance.			Reviews, Provider Monitoring Tool, Participant Satisfaction Survey	provider network, participants
Compile and analyze assessment data	MDCH will work with MI Choice waiver agencies to compile a list of all assessment findings to determine providers who meet, do not meet, and could come into compliance with HCB Settings rules.	5/1/2015	12/31/2015	Assessment tool responses, MI Choice waiver agencies	HCBSS, MI Choice waiver agencies, provider network
Notify providers who do not and cannot meet the Federal requirements. Notify any effected participants of these providers.	Notify providers who are found to not meet and are unable to meet the Federal requirements. These providers will be removed from the program. Participants will also be notified that their provider cannot meet requirements.	5/1/2015	12/31/2015	Assessment tool responses	HCBSS, MI Choice waiver agencies, provider network, MI Choice participants
Notify CMS of any presumptively non-home and community-based settings that do have qualities of home and community-based settings for heightened scrutiny	MDCH will provide justification/evidence to CMS to show that these settings do not have the characteristics of an institution and do have the qualities of home and community-based settings.	5/1/2015	12/31/2015	Assessment tool responses	HCBSS, MI Choice waiver agencies, provider network, CMS
Provider Individual Remediation	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.	5/1/2015	12/31/2015	Revised policies and procedures, remediation plans	HCBSS, MI Choice waiver agencies, provider network, CMS

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	Providers will be required to submit periodic status updates on remediation progress to MI Choice waiver agencies who will forward information to the MDCH. The state 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.				
Submit revised Transition Plan to CMS including assessment/remediation results.	Submit revised Transition Plan to CMS including details on results of the assessment and remediation steps of the timeline.	1/1/2016	1/31/2016	HCB Settings Transition Plan, Assessment data, Remediation data	HCBS, LTC Policy, MI Choice waiver agencies, provider network, Quality Management Collaborative, MI Choice participants
Provide choice to participants to ensure they use settings that meet HCB settings requirements.	Provide choice to participants in provider controlled and owned residential settings to transition to a non-HCBS program or find a new residential or non-residential setting that meets requirements.	1/1/2016	12/31/2016	Provider network listings, Assessment data,	MI Choice waiver agencies, Participants

Section 3: Outreach and Engagement					
<i>Action Item</i>	<i>Description</i>	<i>Start Date</i>	<i>End Date</i>	<i>Sources</i>	<i>Key Stakeholders</i>
Initial Stakeholder Meeting to begin development of statewide plans	Initial meeting to share information across programs and gather initial concerns.	8/12/2014	8/12/2014	CMS written guidance, MDCH staff, data analysis	MI Choice waiver agencies, HCBS providers, MI Choice

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					participants, HCBSS, LTC Policy
Public Notice – 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 website posting, newspaper and mailings.	8/26/2014	9/26/2014	Draft transition plan, waiver amendment document, MDCH website, policy L-letter, newspaper	MI Choice waiver agencies, HCBS providers, MI Choice participants, MSA policy and publications, HCBSS, LTC Policy
Public Comment – Transition Plan	MDCH will collect public comments on the draft transition plan through multiple methods including email, US mail and stakeholder meetings. MDCH will make appropriate changes to the plan and will post comments and responses on the MDCH website >> Health Care Coverage >> Home and Community-Based Services Program Transition.	8/26/2014	9/26/2014	Email comments, US mail comments, meeting minutes, MDCH website.	MI Choice waiver agencies, HCBS providers, MI Choice participants, MSA policy and publications, HCBSS, LTC Policy
Revise Transition Plan and post	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 >> Health Care Coverage >> Home and Community-Based Services Program Transition.	9/26/2014	9/30/2014	Draft transition plan, modified transition plan, public comments notes and responses, MDCH website.	HCBSS, LTC Policy
Public Notice – Assessment results/report	MDCH will present the results of the assessment data to stakeholders and post results, including providers who meet, do not meet, and could come into compliance with HCB	6/1/2015	7/31/2015	Assessment tool, data analysis, MDCH website, policy L-letter, newspaper	MI Choice waiver agencies, HCBS providers, MI Choice participants, MSA

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	Settings rules.				policy and publications, HCBSS, LTC Policy
Assessment Results and Report Presentation	MDCH will formally present the results of the assessment data (including providers who meet, do not meet, and could come into compliance with HCB Settings rules) to stakeholders and post on relevant websites, including MDCH website >> Health Care Coverage >> Home and Community-Based Services Program Transition.	7/1/2015	8/31/2015	Assessment tool, data analysis, MDCH website	HCBSS, LTC Policy, MI Choice waiver agencies, provider network, Quality Management Collaborative