

| Phase ONE: Orientation | | Planned Date | Revised Date | Progress | Progress Updates |
|------------------------|---|--------------|--------------|--------------------|--|
| 1 | Establish the HCBS Rules Steering Committee | Nov-18 | Aug-19 | Complete | |
| 2 | Determine and establish workgroup types to include representatives from the MCOs, providers, stakeholders and members/families | Nov-18 | Aug-19 | Complete | |
| 3 | Disseminate and analyze the member and provider survey results | Feb-19 | N/A | N/A | Moved activity to Phase Two. |
| 4 | Facilitate tours of each setting type for the workgroup members | Dec-18 | N/A | N/A | Workgroups were established with providers, members, and MCO participants familiar with the HCBS settings. |
| 5 | Enhance current website with information for all stakeholders to prepare for the development and implementation of the communication plan | Dec-18 | Mar-22 | Initiated | A website update is currently being incrementally updated including plans for a timeline for members and providers, member right information, and a branding campaign to show that the HCBS Rules for Arizona means "Equality Through Choice (ETC)" |
| 6 | Develop and implement communication plan for members, family members, providers and community partners (i.e. Arizona Department of Health Services, Arizona Department of Education, long term care Ombudsman, etc.). | Feb-19 | Mar-22 | Initiated | AHCCCS is seeking guidance from the Steering Committee, workgroups, and other advisory councils on the best communication practices to provide information to members and providers on their roles and opportunities under the HCBS Rules. |
| 6a. | Develop and disseminate member and family member educational materials including establishing ongoing member and family member education and outreach strategies | Mar-19 | N/A | NA | Combined this activity with #8. |
| 7 | Develop and implement setting type provider training including establishing requirements for MCOs to replicate and/or conduct refresher training on an ongoing basis. | Jun-19 | Jul-23 | Partially Complete | Provider training was initiated in January 2020. The plan was to follow up the training by regular peer-to-peer technical assistance sessions; however, the COVID pandemic interrupted those plans. AHCCCS re-initiated provider training in March 2021 to begin the peer-to-peer sessions. Additionally, sessions are being planned to address specific topics raised in the March 2021 sessions. Recorded training sessions are available on the AHCCCS website for reference. |

| Phase ONE: Orientation Cont. | | Planned Date | Revised Date | Progress | Progress Updates |
|------------------------------|--|--------------|--------------|-----------|---|
| 7a. | Develop and implement Case Management training including establishing requirements for MCOs to replicate and/or conduct refresher training on an ongoing basis | Jun-19 | Jun-21 | Complete | Case Management training for the Person Centered Planning document pilot was held in June and July of 2019. Based on feedback, the training was revised and additional trainings were held in March of 2021 with the tool being required starting June 1, 2021. |
| 8 | Initiate the development of two toolkits, one for members/families and advocates and the other for the provider community, including outreach and educational materials. | Jun-19 | Jun-23 | Initiated | Member and family member education materials will be released via the website update and constant contact notification. |

| PHASE TWO: Monitoring Tools and Processes | | Planned Date | Revised Date | Progress | Comments |
|---|--|--------------|--------------|-----------|--|
| 1 | Institute HCBS Rule standards into the Operational Review tools for audits of the MCOs | Jun-19 | Nov-22 | Complete | AHCCCS has incorporated HCBS Rules quality review validation for the next review cycles January 2023. |
| 2 | Finalize the development of two toolkits, one for members/families and advocates and the other for the provider community. | Jun-19 | Jun-23 | Initiated | The toolkits which will include member specific guidance around rights and provider specific guidance around compliance are being created, edited by the workgroups and Steering committee, and will be finalized and released with the website update. |
| 3 | Revise current MCO monitoring tools for providers to incorporate HCBS Rules requirements and assess providers for compliance | Jun-19 | May-21 | Complete | The workgroups and Steering Committee have reviewed and provided feedback that is being taken into consideration to modify the tools and release a final version in December 2019. The final version was created; however, before we could implement, we needed to adjust the forms to be used with a desk audit in light of COVID. A final COVID-19 desk audit tool suite was released in May 2021. . . |

| PHASE TWO: Monitoring Tools and Processes Cont. | | Planned Date | Revised Date | Progress | Comments |
|--|---|---------------------|---------------------|-----------------|---|
| 4 | Develop reports and incorporate into existing reporting processes for MCOs to report site-specific setting compliance with the HCBS Rules | Jun-19 | Aug-21 | Complete | A quarterly reporting template was finalized in August 2021. MCOs are now required to submit quarterly reports. In addition to the report submissions, AHCCCS hosts monthly meetings with the Quality Management personnel at the MCO's to discuss progress, outcomes and themes of the assessments and opportunities for technical assistance. |
| 5 | Develop processes for disseminating and analyzing systemic member experience surveys | Jun-19 | Jan-24 | Initiated | Currently in process of finalizing plans to use the National Core Indicator for systemic member surveys. |
| 6 | Develop standardized tools MCO Case Managers will use during 90-day person centered plan reviews to ascertain member integration experience and progress with personal goals, including supports offered by the in-home care and non-residential providers. | Jan-19 | Jun-21 | Complete | Case Management training for the Person Centered Planning document pilot was held in June and July of 2019. Based on feedback, the training was revised and additional trainings were held in March of 2021 with the tool being required starting June 1, 2021. |

| PHASE THREE: Policy and Contract Revisions | | Planned Date | Revised Date | Progress | Comments |
|---|--|---------------------|---------------------|--------------------|--|
| 1 | Implement policy changes to AHCCCS policy outlined in the setting type transition plans including general language regarding the HCBS Rules as basic rights afforded to all members. | Jun-20 | Mar-23 | Complete | All policy changes have been made effective March 1, 2023. |
| 1a | Implement policy changes outlined in setting type transition plans | Jun-20 | N/A | N/A | Combined this activity with #1. |
| 1b | Develop and implement general language in policy regarding HCBS Rule compliance including adding the HCBS Rules as basic rights afforded to all members. | Jun-20 | N/A | N/A | Combined this activity with #1. |
| 2 | Implement changes to DES/DDD policy outlined in setting type transition plans | Jun-20 | Apr-23 | Partially Complete | DES/DDD's policy updates are out for public comment and will be finalized by mid-April 2023. |
| 3 | Amend the AHCCCS Provider Participation Agreements to include a requirement for providers to attest compliance with the HCBS Rules prior to onset of service delivery. | Oct-19 | Feb-23 | Complete | Changes to the Provider Participation Agreement to require all new providers to be in HCBS Rules compliance before the onset of service delivery were made on February 26, 2023. |

| PHASE THREE: Policy and Contract Revisions Cont. | | Planned Date | Revised Date | Progress | Comments |
|--|---|--------------------------------------|--------------------------------------|--------------------|--|
| 4 | Amend DES/DDD provider contracts per the contract revision remediation strategies outlined in the setting type transition plans | Jun-20 | Oct-22 | Partially Complete | DES/DDD's policy updates are out for public comment and will be finalized by mid-April 2023. |
| 5 | Amend MCO contracts and Tribal ALTCS Intergovernmental Agreements as applicable to incorporate the HCBS Rule and to institute a requirement that prior to contracting with (or reimbursing services for) an HCBS provider, the provider must be in compliance with the HCBS Rules | Oct-19 | Oct-22 | Complete | MCO Contracts were amended to require HCBS compliance prior to service delivery for HCBS providers. It was determined Tribal ALTCS Intergovernmental Agreement changes were not necessary. |
| 6 | MCOs assess and monitor all site-specific settings for all HCBS providers and provide technical assistance for noted deficiencies to HCBS Rule compliance noted in the Corrective Action Plans following the regularly scheduled annual monitoring cycles | Jun-20 | Mar-22 | Complete | MCOs have started the second round of complete assessments in April 2022. AHCCCS hosts monthly meetings with the Quality Management personnel at the MCO's to discuss progress, outcomes and themes of the assessments and opportunities for technical assistance. All settings will have had at least 2 assessments by the end of February 2023 to ensure all providers are compliance by March 17, 2023. |
| 7 | MCOs report quarterly site-specific setting compliance with the HCBS Rules | Oct-19 Jan-20 Apr-20 Jul-20 | Nov-21 Feb-22 May-22 Aug-22 | Complete | MCOs reported all setting assessments for the first and second year of compliance and continue to report on an ongoing basis. |
| 8 | Prepare Heightened Scrutiny evidentiary packets (January 2022), convene public comment period (February 2022) and submit package to CMS to review (March 2022). | May-20 Jun-20 Jul-20 | Jan-22 Feb-22 Mar-22 | Complete | Heightened scrutiny settings were identified and the summary forms were completed and submitted by the MCOs to AHCCCS. The AHCCCS HCBS website was updated in February 2022 to collect public comments to complete the evidentiary packet that was shared with CMS in March 2022. |

| PHASE Four | | Planned Date | Revised Date | Progress | Comments |
|------------|---|--------------|--------------|-----------|--|
| 1 | MCOs assess and monitor all site-specific settings for all HCBS providers and provide technical assistance for noted deficiencies to HCBS Rule compliance noted in the Corrective Action Plans following the regularly scheduled annual monitoring cycles | Jun-21 | Mar-23 | Complete | MCOs have completed site-specific monitoring for HCBS compliance and providing technical assistance as of April 2021. MCOs will continue assessments as part of ongoing monitoring. |
| 2 | MCOs report quarterly site-specific setting compliance with the HCBS Rules | Oct-21 | Nov-22 | Complete | MCOs reported all setting assessments for the second year of compliance. MCOs will continue assessments as part of ongoing monitoring. |
| | | Jan-21 | | | |
| | | Apr-21 | Mar-23 | | |
| | | Jul-21 | | | |
| | | | | | |
| 3 | Finalize any and all decisions requiring relocation of members to compliance least restrictive settings | Jun-21 | Jun -22 | Completed | After the first round of HCBS Assessments, it was determined that relocation of member's was not needed and all settings could come into compliance by March 2023. |
| 4 | Prepare Heightened Scrutiny evidentiary packets (May 2022), convene public comment period (June 2022) and submit package to CMS to review (July 2022). | May-21 | May-22 | Complete | Heightened scrutiny settings were identified and the summary forms were completed and submitted by the MCOs to AHCCCS. The AHCCCS HCBS website was updated in June 2022 to collect public comments to complete the evidentiary packet that was shared with CMS in July 2022. |
| | | Jun-21 | Jun-22 | | |
| | | Jul-21 | Jul-22 | | |