## HCBS Rules Compliance Monitoring

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<th>Macro-Level AHCCCS Monitoring</th>
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| Systemic Surveys Reference page 37 | Disseminate provider self-assessments and member experience surveys | All | Statistically significant number of providers and members for each setting type, stratified by GSAs | Submit report to CMS as part of the milestone reporting process. Report will be shared with the workgroups. Report will be posted online. | **Phase One** – June 2019  
**Phase Three** – June 2020  
**Phase Five** – March 2022 | Continue to disseminate surveys periodically, at a minimum on a biennial basis (January and June). |

| Site-Specific Compliance Reference page 45 | • Aggregate the site-specific compliance data from the MCOs to review the State’s compliance for all site-specific settings  
• AHCCCS will review quarterly deliverable reporting by MCOs of provider monitoring, technical assistance provided and required corrective action plans. | All | All settings types and all site-specific settings | Submit report to CMS as part of the quarterly and milestone reporting process. Aggregated report will be shared with the workgroups. Aggregated Report will be posted online. | **Phase Three** – June 2020  
**Phase Four** – June 2021  
**Phase Five** – March 2022 | Continue to require the MCOs to submit on a quarterly basis. October January April July |
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| Public Input Reference pages 24, 37 and 44 | ✓ AHCCCS will host forums at the onset of each transition phase for public input. The public can submit input at any time to be considered outside of the forums via telephone, email or mail. The public can report individual or community concerns about the compliance of a particular site-specific setting. | All | N/A | Public input through forums and correspondence will be shared with the workgroups. Concerns about site-specific settings will be reported to the MCO and a response strategy will be required to ensure member satisfaction and provider compliance. For example, the response strategy may include an onsite monitoring visit for new settings identified the need to comply with the HCBS Rules. | Phase One – June 2019  
Phase Two – June 2019  
Phase Three – June 2020  
Phase Four – June 2021  
Phase Five – March 2022 | Continue to offer opportunities for public input on state compliance and individual reporting options for site-specific concerns. |
<p>| MCO Operational Reviews Reference page 41 | ✓ AHCCCS will review a sample of monitoring reports for each setting type. AHCCCS will conduct member interviews for the sampled settings | All | Statistically significant sample review of setting type provider audits. Statistically significant sample of members receiving services from the sampled providers. | Submit report to CMS as part of the quarterly reporting process or upon request. | N/A | Implement ongoing focused and triennial audits. The first triennial audit after the completion of the Transition Plan will be in January 2022. |</p>
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<td><strong>Micro-Level MCO Monitoring</strong></td>
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| Site-Specific Compliance by MCO Quality Management Reference pages 45, 46 and 49 | MCOs will employ new standardized monitoring tools and use the tools for the annual monitoring of each site. The monitoring tools will incorporate a sample of member interviews. The new monitoring tool package will include the following tools:  
  - Provider self-assessment  
  - Member interview  
  - Member file review  
  - Observation  
  - Community Interviews | All | All providers will be monitored for compliance. A statistically significant sample of members for each site-specific setting will have a member experience interview | MCOs will report site-specific monitoring findings to AHCCCS through contract required deliverables. | **Phase Three** – June 2020  
**Phase Four** – June 2021  
**Phase Five**- March 2022 | Annual monitoring visits |
| Member Experience by MCO Case Management Reference page 43 | MCO Case Managers will use standardized tools during 90-day reviews to access compliance from the member perspective. | All | All members | Documentation in the person-centered plan. | **Phase Four** – June 2021  
**Phase Five**- March 2022 | 90-day service plan monitoring visits |