



Section: Provider Network Management	Policy Name: Home and Community Based Service (HCBS) Compliance Monitoring	Policy Number: 02.20
Owner: Chief Clinical Officer	Reviewed By: Alena Lacey, MA, LPC	Total Pages: 3
Required By: ☐ BBA ☒ MDHHS ☐ NCQA ☐ Other (please specify): 	Final Approval By: <i>Alena Lacey</i>	Date Approved: Jul 23, 2026
Application: ☒ SWMBH Staff/Ops ☒ Participant CMHSPs ☐ SUD Providers ☒ MH/IDD Providers ☐ Other (please specify):	Line of Business: ☒ Medicaid ☐ Other (please specify): ☒ Healthy Michigan ☐ SUD Block Grant ☐ SUD Medicaid ☐ MI Health Link	Effective Date: 3/29/2023

Policy: SWMBH will ensure that its member CMHSPs and their contractual providers of residential and nonresidential home and community-based services are compliant with the Federal HCBS Final Rule.

Purpose: To ensure that the Southwest Michigan Behavioral Health (SWMBH) conducts monitoring and coordination of oversight of the Provider Network with the Community Mental Health Services Program (CMHSP), specifically Home and Community Based Services (HCBS) Program Rule compliance with federal and state regulations through a collaborative, standardized procedure for conducting reviews.

Scope: SWMBH; Participant CMHSPs

Definitions:

Out of Compliance: the status of a provider who has answered the HCBS survey in such a way as to require a corrective action plan to the identified area.

Provider: A provider, internal or external to the SWMBH region, who has a current contractual agreement to provide Medicaid services to individuals the CMHSP supports.

**References:**

- The Medicaid Managed Specialty Supports and Services Concurrent 1915(i)/(c) Waiver Program(s)
- MSA Bulletin 17-31 Compliance with Federal Home and Community Based Services (HCBS) Final Rule by New Providers
SWMBH Policy 2.13 Provider Network Monitoring
- SWMBH Policy 2.19 Provisional Provider Approval for Home and Community Based Services (HCBS) Services

Attachments:

02.20A HCBS IPOS Monitoring Grid



Revision History

Revision #	Revision Date	Revision Location	Revision Summary	Revisor
0	3/24/2023	N/A	New Policy	Jen Strebs
1	2/26/25	References and policy attachment	Added compliance monitoring procedure for HCBS IPOS reviews and two references	Alena Lacey

02.20 HCBS Compliance Monitoring

Final Audit Report

2026-07-23

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