

## CMS Finalizes Major Regulatory Changes to Medicaid Access Standards and HCBS

The table below is provided as a summary of the compliance dates.

Policy	Compliance Date
MAC and BAC	July 9, 2025
Phase-in crossover membership	Immediately, but fully phased-in over three years
Annual Reporting	July 9, 2026
<b>FFS State Plan Access Reviews</b>	
Rate reduction and restructuring SPA procedures and access review	July 9, 2024
<b>FFS Payment Rate Transparency and Comparative Rate Analyses</b>	
Post and maintain publicly accessible Medicaid fee schedules	July 1, 2026, then updated within 30 days of a payment rate change
Comparative rate analysis for primary care, OB/GYN, and outpatient behavioral health services	July 1, 2026, then every two years
Publish the average hourly rate paid for personal care, home health aide, homemaker, and habilitation services, and publish the disclosure every two years	July 1, 2026, then every two years
Establish an advisory group on payment rates for direct care workers for personal care, home health aide, homemaker, and habilitation services	First meeting must occur by July 9, 2026 and then at least every two years
<b>HCBS and MLTSS</b>	
Strengthened person-centered planning	July 9, 2027; for MLTSS, the first rating period following this date
Nationwide electronic incident management system standards	July 9, 2029; for MLTSS, the first rating period following this date
HCBS FFS Grievance System	July 9, 2026
State readiness and reporting on compensation for personal care, home health care, homemaker services, and habilitation services	July 9, 2027; for MLTSS, the first rating period following this date
Payment rate adequacy reporting requirements for compensation for personal care, home health care, homemaker services, and habilitation services	July 9, 2028; for MLTSS, the first rating period following this date
80% rule for direct care worker compensation (not including habilitation services)	July 9, 2030; for MLTSS, the first rating period following this date
HCBS Access to Services, including waiver waiting list reporting	July 9, 2027; for MLTSS, the first rating period following this date
Requirement for states to report on nationally standardized HCBS quality measures and progress towards meeting goals	July 9, 2027; for MLTSS, the first rating period following this date