

OASIS · AT A GLANCE

HSW renewals and changes: what to watch for

The waiver funding your family's services gets renewed and amended on a schedule most families never learn exists, through a public comment window most families never notice is open.

BY JIM PALASTY · 10 MIN READ · THE QUIET PAPERWORK THAT CHANGES YOUR PLAN

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YEARS BETWEEN FULL RENEWALS

Amendments happen more often than that, and most families never see the public comment window that precedes them.

How it works

THREE STEPS

STEP 1

The waiver comes up for renewal

Or an amendment gets proposed mid-cycle to change a rate, definition, or eligibility rule.



STEP 2

A public comment period opens

Usually a short window, announced in places families rarely check.



STEP 3

Changes take effect either way

Whether or not any family submitted a comment, the new terms apply once approved.

What to track

Announcement	When a renewal or amendment is first proposed
Comment window	The exact open and close dates for public input
Proposed changes	The specific summary of what would change and why
Effective date	When approved changes actually take effect
Your comment	Whether you submitted one, and what it said

THE REDEFINITION NOBODY FLAGGED



Terrence found the proposed amendment by accident, in a public notice bulletin his supports coordinator happened to forward. The redefinition would have narrowed which CLS activities counted as billable. He submitted a written comment describing specifically how the change would affect his son's authorized hours. The final rule kept the broader definition intact.

NOBODY ANNOUNCED THE CHANGE LOUDLY. NOBODY WAS REQUIRED TO. THE COMMENT WINDOW WAS OPEN THE WHOLE TIME.

What matters, at a glance

MICHIGAN SPECIFIC

Renewal cycle

Federal HCBS waivers renew on a multi-year cycle, with amendments possible at any point in between.

Public comment period

A legally required window for public input before a renewal or amendment is finalized, often brief and easy to miss.

Silent amendments

Mid-cycle changes to service definitions or rates can move through without most families ever hearing about the proposal.

Rate changes

Reimbursement rate amendments affect which providers are willing to take on new clients under the waiver.

Eligibility redefinitions

A small wording change to a service definition can shift who qualifies without ever being framed as an eligibility change.

Service definition changes

What counts as "Community Living Supports" or "respite" can be redefined during an amendment cycle.

BRING THESE · CHECK AS YOU GO

- | | |
|---|--|
| ☐ A subscription to MDHHS and Regulations.gov waiver notices | ☐ The full text of any proposed amendment |
| ☐ Notes on how the change affects your specific plan | ☐ A drafted written comment before the deadline |
| ☐ A dated record of your submitted comment | |

YOUR MOVE

When a waiver renewal or amendment is proposed, here is how to respond

- 1 Subscribe to MDHHS waiver public notices directly.
- 2 Read the renewal or amendment summary in full.
- 3 Identify anything affecting your specific services.
- 4 Submit a specific written comment if concerned.
- 5 Ask your case manager how the change affects your plan.
- 6 Document any resulting change to your authorization.

A comment window that closes unnoticed still closes. Subscribing once means you never miss the next one by accident.

RESOURCES NAMED IN THIS POST

mimddc.org · <https://www.mimddc.org>

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ABOUT THE AUTHOR

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