

**FY2018 Michigan Department of Health and Human Services
Behavioral Health and Developmental Disabilities Administration
Substance Use Disorder Administrative Monitoring Protocol**

6/6/18

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PIHP Name: Mid-State Health Network Staff: Kim Zimmerman	Date: July 11& 18, 2018 Reviewer Names: John Tyminski & Benita Koyton
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	Requirement (citation)	Evidence To Support Compliance Requirement	Evidence Document Name and Location in Document (Page Number)	Compliance Rating 2= Full 1 = Partial 0= None	Comments/Findings
1) Contracting	<p>PIHPs must make contracts necessary and incidental to the performance of the department-designated community mental health entity's and community mental health service program's functions. The contracts may be made with public or private agencies, organizations, associations, and individuals to provide for substance use disorder treatment and rehabilitation services and substance use disorder prevention services.</p> <p>MDHHS/PIHP Contract Boilerplate, 1.0 Statement of Work, Item 6, Page 68</p>	<p>List of all public or private agencies, organizations, associations, and individuals providing substance use disorder treatment and rehabilitation services and substance use disorder prevention services.</p> <p>Copy of provider contracts</p>	Reviewed most recent contract held by Mid-State.	2	<p>All contracts reviewed were fully executed.</p> <p>Arbor Circle Catholic Charities of West Michigan Cristo Rey Community Center Dawn Farm-No longer holds contract Eaton Behavioral Health List Psychological Services, Inc. McCullough, Vargas & Assoc. Our Hope Association (Women Only) Professional Psychological & Psychiatric Services (PPPS) Sacred Heart Rehabilitation Center Saginaw Odyssey House Salvation Army Turning Point Sisters of Sobriety Women of Colors</p>

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2) Annual Evaluation of SUD Services	The PIHP must annually evaluate and assess substance use disorder services in the department-designated community mental health entity in accordance with the guideline established by the Department. MDHHS/PIHP Contract Boilerplate, 1.0 Statement of Work, Item 7, Page 69	<p>Copies of policies and procedures</p> <p>Monitoring tool</p> <p>Copies of reports findings</p> <p>Evidence of making reports available to public</p>	<p>Evidence of making reports available to public on the website.</p> <p>Reviewed policies and procedures, monitoring tools</p>	2	<p>Arbor Circle 1-4-17 66% CAP 1-26-18</p> <p>Catholic Charities of West Michigan 6-7-17 87% CAP 2-16-18</p> <p>Cristo Rey Community Center 8-3-17 89% CAP 10-18-17</p> <p>Dawn Farm 2-16-18</p> <p>Eaton Behavioral Health9-5-15-18 95% CAP 12-6-17</p> <p>List Psychological Services, Inc. 10-26-17 78% CAP 1-12-17</p> <p>McCullough, Vargas & Assoc. 4-16-18 92% CAP 5-17-18</p> <p>Our Hope Association (Women Only) 4-13-17 Completed by Lakeshore 3-8-18 CAP not required</p> <p>Professional Psychological & Psychiatric Services (PPPS) 9-11-17 56% CAP 6/19/17</p> <p>Sacred Heart Rehabilitation Center 8-31-17 71% CAP 8/1/17</p> <p>Saginaw Odyssey House 6-27-18 76% CAP 8-1-17</p> <p>Salvation Army Turning Point 5-10-17 Completed by Lakeshore 3-8-18</p> <p>Sisters of Sobriety 3-28-18 83% CAP 5-21-18</p> <p>Women of Colors None</p>

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3) Selected Specific Block Grant Requirements Applicable to PIHPs	<p>The PIHP must ensure that Block Grant Funds shall not be used to:</p> <ol style="list-style-type: none"> 1. Pay for inpatient hospital services except under conditions specified in federal law 2. Make cash payments to intended recipients of services 3. Purchase or improve land, purchase, construct, or permanently improve and building or any other facility, or purchase major medical equipment <p>MDHHS/PIHP Contract Boilerplate, section 2.1 Selected Specific Block Grant Requirements Applicable to PIHPs, Page 70</p>	Copies of policies and procedures		2	<p>Arbor Circle Catholic Charities of West Michigan Cristo Rey Community Center Dawn Farm Eaton Behavioral Health List Psychological Services, Inc. McCullough, Vargas & Assoc. Our Hope Association (Women Only) Professional Psychological & Psychiatric Services (PPPS) Sacred Heart Rehabilitation Center Saginaw Odyssey House Salvation Army Turning Point Sisters of Sobriety Women of Colors</p>

Fiscal Year 2016 Site Visit Protocol – SUD/PIHP Compliance Protocol

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3) Selected Specific Block Grant Requirements Applicable to PIHPs	<p>4. Satisfy any requirement for the expenditure of non-Federal funds as a condition for the receipt of funds</p> <p>5. Provide individuals with hypodermic needles or syringes so that such individuals may use illegal drugs</p> <p>6. Enforce state laws regarding the sale of tobacco products to individuals under the age of 18</p> <p>7. Pay the salary of an individual as a rate in excess of Level I of the Federal Executive Schedule, or approximately \$199,700</p> <p>MDHHS/PIHP Contract Boilerplate, section 2.1 Selected Specific Block Grant Requirements Applicable to PIHPs, Page 70</p>	Copies of policies and procedures			

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4) Licensure of Subcontractors	<p>The PIHP shall enter into agreements for substance use disorder prevention, treatment, and recovery services only with providers appropriately licensed for the service provided as required by Section 6234 of P.A 501 of 2012, as amended</p> <p>MDHHS/PIHP Contract Boilerplate, section 2.5, Page 71</p>	<p>Copies of LARA Licenses</p> <p>Screenshots for LARA Health Professional Website</p>		2	<p>Arbor Circle 7-31-19</p> <p>Catholic Charities of West Michigan 7-31-18</p> <p>Cristo Rey Community Center 7-31-19</p> <p>Dawn Farm 7-31-19</p> <p>Eaton Behavioral Health 7-31-18</p> <p>List Psychological Services, Inc. 7-31=19</p> <p>McCullough, Vargas & Assoc. 7-31-18</p> <p>Our Hope Association (Women Only) 7-31-18</p> <p>Professional Psychological & Psychiatric Services (PPPS) 7-31-18</p> <p>Sacred Heart Rehabilitation Center 7-31-19</p> <p>Saginaw Odyssey House 7-31-18</p> <p>Salvation Army Turning Point 7-31-18</p> <p>Sisters of Sobriety 7-31-19</p> <p>Women of Colors 7-31-19</p>

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5) Accreditation of Subcontractors	<p>The PIHP shall enter into agreements for treatment services provided through outpatient, methadone, sub-acute detoxification, and residential providers only with providers accredited by the following bodies: TJC, CARF, AOA, COA, NCQA, AAAHC</p> <p>MDHHS/PIHP Contract Boilerplate, section 2.6, Page 71</p>	<p>Copies of original correspondence for accreditation bodies to providers</p> <p>Policies and Procedures</p>		2	<p>Arbor Circle JC 7-15-19 Catholic Charities of West Michigan COA 6-30-18 - Pending Cristo Rey Community Center CARF 11-4-19 Dawn Farm CARF 12-17- No longer has contract Eaton Behavioral Health CARF 11-30-19 List Psychological Services, Inc. COA 10-31-18 McCullough, Vargas & Assoc. CARF 1-31-21 Our Hope Association (Women Only) CARF 10-31-20 Professional Psychological & Psychiatric Services (PPPS) CARF 8-31-20 Sacred Heart Rehabilitation Center CARF 10-31-20 Saginaw Odyssey House CARF 10-31-18 Salvation Army Turning Point JC 2-16-20 Sisters of Sobriety-Prevention Women of Colors-Prevention</p>

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6) Subcontractor Information to Be Retained at the PIHP	<p>The PIHP shall retain the following:</p> <ol style="list-style-type: none"> 1. Budgeting information for each service 2. Documentation of how fixed unit rates were established (consistent with OMB Circular 2 CFR 200 Subpart E, and with the requirements of individual fund sources 3. Indirect cost documentation in accordance with OMB Circular 2 CFR 200 Subpart E, as applicable 4. Equipment inventories (tangible, non-expendable personal property having a useful life of more than 1 year and an acquisition cost of \$5,000 or more <p>MDHHS/PIHP Contract Boilerplate, section 11.0, Page 75</p>	Documentation of each, as applicable		2	Arbor Circle Catholic Charities of West Michigan Cristo Rey Community Center Dawn Farm Eaton Behavioral Health List Psychological Services, Inc. McCullough, Vargas & Assoc. Our Hope Association (Women Only) Professional Psychological & Psychiatric Services (PPPS) Sacred Heart Rehabilitation Center Saginaw Odyssey House Salvation Army Turning Point Sisters of Sobriety Women of Colors

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7) 12-Month Availability of Services	<p>The PIHP shall assure that, for any subcontracted treatment or prevention service, each subcontractor maintains service availability throughout the fiscal year for persons who do not have the ability to pay.</p> <p>MDHHS/PIHP Contract Boilerplate, section 19.1, Page 77</p>	<p>Copies of policies and procedures</p> <p>Encounter and TEDS reporting</p>		2	<p>Arbor Circle Catholic Charities of West Michigan Cristo Rey Community Center Dawn Farm Eaton Behavioral Health List Psychological Services, Inc. McCullough, Vargas & Assoc. Our Hope Association (Women Only) Professional Psychological & Psychiatric Services (PPPS) Sacred Heart Rehabilitation Center Saginaw Odyssey House Salvation Army Turning Point Sisters of Sobriety Women of Colors</p>

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8) Primary Care Coordination	<p>The PIHP must take all appropriate steps to assure that substance use disorder treatment services are coordinated with primary health care. Treatment case files must include, at minimum, the primary care physician's name and address, and a signed release of information for purposes of coordination, or a statement that the client has refused to sign a release</p> <p>MDHHS/PIHP Contract Boilerplate, section 19.5, Page 77</p>	<p>Copies of policies and procedures</p> <p>Evidence from case files</p>		2	<p>Arbor Circle 6/20 CF=Case File</p> <p>Catholic Charities of West Michigan 14/22 CF</p> <p>Cristo Rey Community Center 22/22 CF</p> <p>Dawn Farm CF</p> <p>Eaton Behavioral Health CF</p> <p>List Psychological Services, Inc.16/22 CF</p> <p>McCullough, Vargas & Assoc. 12/12 CF</p> <p>Our Hope Association (Women Only) CF</p> <p>Professional Psychological & Psychiatric Services (PPPS) Score 20/22 CF</p> <p>Sacred Heart Rehabilitation Center 0/22 CF</p> <p>Saginaw Odyssey House 22/22 CF</p> <p>Salvation Army Turning Point CF</p> <p>Sisters of Sobriety 0/24</p> <p>Women of Colors Lacks CF</p>

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9) Charitable Choice	<p>The PIHP is required to comply with all applicable requirements of the Charitable Choice regulations. The PIHP must ensure that treatment clients and prevention service recipients are notified of their right to request alternative services. Notice may be provided by the AMS or by providers that are faith-based. The PIHP must assign responsibility for providing the notice to the AMS, to providers, or both. Notification must be in the form of the model notice contained in the final regulations, or the PIHP may request written approval from MDHHS of an equivalent notice.</p> <p>MDHHS/PIHP Contract Boilerplate, section 19.6, Page 77</p>	<p>Copies of policies and procedures</p> <p>Copies of the model notice</p>		2	Catholic Charities of West Michigan Renewal Christian Counseling Center (Values are Christian Based) Wedgewood

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10) Women's Specialty Services Federal Requirements	<p>Federal requirements are contained in 45 CFR (Part 96), section 96.124, and may be summarized as:</p> <p>Providers receiving funding from the state-administered funds set aside for pregnant women and women with dependent children must provide or arrange for the 5 types of services, as listed below.</p> <ol style="list-style-type: none"> 1. Primary medical care for women, including referral for prenatal care if pregnant, and while the women are receiving such treatment, child care. 2. Primary pediatric care for their children, including immunizations 3. Gender specific substance use disorder treatment and other therapeutic interventions <p>MDHHS/PIHP Contract Boilerplate, section 25.1, Page 84</p>	<p>Copies of Policies and Procedures</p> <p>Evidence of the provision or arrangement of these services</p>	In the contract, polices, monitoring tool.	2	<p>Arbor Circle Eaton Behavioral Health List Psychological Services, Inc. McCullough, Vargas & Assoc. Our Hope Association (Women Only) Sacred Heart Rehabilitation Center Saginaw Odyssey House</p>

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10) Women's Specialty Services Federal Requirements (con't)	<p>4. Therapeutic interventions for children in custody of women in treatment, which may, among other things, address their developmental needs, issues of sexual and physical abuse, and neglect</p> <p>5. Sufficient case management and transportation to ensure that women and their dependent children have access to the above mentioned services</p> <p>MDHHS/PIHP Contract Boilerplate, section 25.1, Page 84</p>				

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11) Women's Specialty Services Requirements Regarding Providers	<p>Women's Specialty Services may only be provided by providers that are designated as gender-responsive by the Department or as gender-competent by the PIHP that meet standard panel eligibility requirements. The provider may be designated by the Department as Women's Specialty providers, but such designation is not required. The PIHP must continue to provide choice form a list of providers who offer gender-competent treatment and identify providers that provide the additional services specified in the federal requirements</p> <p>MDHHS/PIHP Contract Boilerplate, section 25.2, Page 84</p>	<p>Copies of Policies and Procedures</p> <p>List of gender –competent providers</p>		2	<p>Arbor Circle Eaton Behavioral Health List Psychological Services, Inc. McCullough, Vargas & Assoc. Our Hope Association (Women Only) Sacred Heart Rehabilitation Center Saginaw Odyssey House</p>

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12) Fetal Alcohol Spectrum Disorders (FASD) Prevention Activities	The PIHP shall ensure that FASD prevention activities are part of all substance use disorder treatment programs that serve women. MDHHS recommends using one of the FASD prevention curriculums for women in the selected or indicated group (IOM Committee to Study Fetal Alcohol Syndrome recommendation) MDHHS/PIHP Contract Boilerplate, section 33.1, Page 93	Copies of Policies and Procedures		2	Arbor Circle Eaton Behavioral Health List Psychological Services, Inc. McCullough, Vargas & Assoc. Our Hope Association (Women Only) Sacred Heart Rehabilitation Center Saginaw Odyssey House
13) Fetal Alcohol Spectrum Disorders (FASD) Screening	The PIHP shall ensure that any treatment program that serves women must complete the FASD prescreen for children that they interact with during the mother's treatment episode MDHHS/PIHP Contract Boilerplate, section 33.2, Page 93	Copies of Policies and Procedures Copy of Screening Tool		2	Arbor Circle Eaton Behavioral Health List Psychological Services, Inc. McCullough, Vargas & Assoc. Our Hope Association (Women Only) Sacred Heart Rehabilitation Center Saginaw Odyssey House