

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

Page 1 of 12

PIHP Name: Mid State Health Network	Date: July 14, 2020
--	----------------------------

	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>	<p>#1 Boysville dba Holy Cross (Treatment) #2 Peer 360 (Prevention) #3 Prevention Network (Prevention) #4 Randy's House (Recovery) #5 Cherry Street (Treatment)</p> <p style="text-align: center;">01- MDHHS Audit FY20 SUD Provider Contract List</p>	2=Full	All contracts executed and signed

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

PIHP Name: Mid State Health Network	Date: July 14,2020
--	---------------------------

	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
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	Copies of policies and procedures Monitoring tool Copies of reports findings Evidence of making reports available to public	Final MSHN 2019 Compliance Summary Report Posted to website https://midstatehealthnetwork.org/consumers-resources/quality-compliance/compliance-reports #1 <u>Boysville dba Holy Cross (Treatment)</u> #2 <u>Peer 360 (Prevention)</u> #3 <u>Prevention Network (Prevention)</u> #4 <u>Randy's House (Recovery)</u> #5 <u>Cherry Street (Treatment)</u> #6 <u>Delegated Managed Care Site Review</u> #7 <u>Policies and Procedures</u> <ul style="list-style-type: none"> • Quality Monitoring Oversight of SUD Providers Procedure • Quality Monitoring and Oversight MSHN_#2_(Recovery Self Assessment_Scale_FY19_Persons in Recovery) MSHN_#2_(Final MSHN Compliance Summary Report) 02- MSHN_#2(Web Calendar	2=Full	MSHN makes SUD evaluation a priority

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

PIHP Name: Mid State Health Network	Date: July 14,2020
--	---------------------------

	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
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	<ul style="list-style-type: none"> • Contract (Boysville dba Holy Cross FY20 SUD Treatment MSHN Executed 9.11.19) • 2019-2020 MSHN Income Eligibility Procedure • Fin_SUD Income Eligibility <p>03- FY20 SUD Provider Manual Final</p>	2=Full	

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

PIHP Name: Mid State Health Network	Date: July 14,2020
--	---------------------------

	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
3) Selected Specific Block Grant Requirements Applicable to PIHPs	4. Satisfy any requirement for the expenditure of non-Federal funds as a condition for the receipt of funds 5. Provide individuals with hypodermic needles or syringes so that such individuals may use illegal drugs 6. Enforce state laws regarding the sale of tobacco products to individuals under the age of 18 7. Pay the salary of an individual as a rate in excess of Level I of the Federal Executive Schedule, or approximately \$199,700 MDHHS/PIHP Contract Boilerplate, section 2.1 Selected Specific Block Grant Requirements Applicable to PIHPs, Page 70	Copies of policies and procedures	<ul style="list-style-type: none"> • Contract (Boysville dba Holy Cross FY20 SUD Treatment MSHN Executed 9.11.19) • 2019-2020 MSHN Income Eligibility Procedure • Fin_SUD Income Eligibility FY20 SUD Provider Manual Final	2=Full	

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

PIHP Name: Mid State Health Network	Date: July 14,2020
--	---------------------------

	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
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>	<p>MSHN 01 Licensure (Holy Cross Bay Recovery House MARR Certificate Level IV Exp. 12.2.20)</p> <p>MSHN 01 Licensure (Holy Cross Details- SA0090080)</p> <p>MSHN 01 Licensure (Holy Cross Details-SA0250383)</p> <p>MSHN 01 Licensure (Holy Cross Details SA0330349)</p> <p>MSHN 01 Licensure (Holy Cross Details-SA0330358)</p> <p>MSHN 01 Licensure (Holy Cross Details-SA0730229)</p> <p>MSHN 01 Licensure (Holy Cross Details SA0730230)</p> <p>MSHN 02 Licensure (Peer 360 SA0090081)</p> <p>MSHN 03 Licensure (Prevention Network Details SA0330167)</p> <p>MSHN 04 Licensure (Randy's House SA0410408)</p> <p>MSHN 05 Licensure (Cherry St. Details SA0410015)</p> <p>MSHN 05 Licensure (SA0410234)</p> <p>MSHN 05 Licensure (Cherry St. Details SA0590037)</p> <p>MSHN 05 Licensure (Cherry St. Details SA0610095)</p>	2= Full	

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

PIHP Name: Mid State Health Network	Date: July 14,2020
--	---------------------------

	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
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>Polices and Procedures</p>	<p>MSHN #1 Accreditation (Boysville dba Holy Cross Accreditation Letter</p> <p>MSHN #5 Accreditation (Cherry St. Services Accreditation Letter BH)</p> <p>MSHN #5 Accreditation (Cherry St. Services Accreditation MRC OTP)</p> <p>MSHN #5 Accreditation (Cherry St. SSHC OTP)</p> <p>06 Delegated Managed Care Site Review Tools</p>	2=Full	

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

PIHP Name: Mid State Health Network	Date: July 14,2020
--	---------------------------

	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
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	01 Provider Budget Explanation 02 Explanation 03 Fin Procurement 04 FY20 MSHN Rates 05 FY19 Cherry Health 06 FY19 Holy Cross 07 FY19 Peer 360 Base Contract 08 FY19 Peer 360 SOR Grant 09 FY19 Peer 360 STR Grant 10 FY19 Prevention Network 11 FY19 Randy's House	2=Full	Rate setting based on costing meets a requirement that others do not meet.

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

PIHP Name: Mid State Health Network	Date: July 14,2020
--	---------------------------

	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
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>	<p>MSHN #7 Boysville Activity</p> <p>MSHN #7 Cherry Street Activities</p> <p>MSHN #7 Contract Boysville dba Holy Cross FY20SUD Treatment</p> <p>MSHN #7 Peer 360</p> <p>MSHN #7 Prevention Network</p> <p>MSHN #7 7-12 month availability (2019-2020) Income Eligibility Procedure</p>	2=Full	Verified in BH TEDS monthly crosstab by month /service

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

PIHP Name: Mid State Health Network	Date: July 14,2020
--	---------------------------

	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
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>	<ul style="list-style-type: none"> • Boysille dba Holy Cross FY20SUD Treatment • FY20SUD Provider Manual • Holy Cross COC • Holy Cross Victory Clinic • Randy's House Coordination of Care A Lynn • Randys House Coordination of Care Fax • Randy's House Coordination of Care M Sanchez • Randys House Fax Confirmation • Cherry STree Health Sickler • Guide To Services 2019 May Service Philosophy policy 	2=Full	

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

PIHP Name: Mid State Health Network	Date: July 14,2020
--	---------------------------

	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
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 style="text-align: right;">MDHHS/PIHP Contract Boilerplate, section 19.6, Page 77</p>	<p>Copies of policies and procedures</p> <p>Copies of the model notice</p>	<ul style="list-style-type: none"> • Holy Cross HCS Agency Mission Values 201908 • Holy Cross Charitable Choice • Contract Boysville dba Holy Cross FY20 SUD Treatment MSHN <p>Charitable Choice Referral Report</p>	2=Full	Having the faith-based provider contact both the UM access center and the next provider (as note in policy) is a better approach than not involving the access center

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

PIHP Name: Mid State Health Network	Date: July 14,2020
--	---------------------------

	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
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 form the state-administered funds set aside for pregnant women and women with dependent children must provide of 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>	<ul style="list-style-type: none"> • Contract Boysville dba Holy Cross FY20SUD Treatment • FY20 SUD Provider Manual Final • Women's Specialty services Holy Cross FY21 Annual Plan document • Women's Specialty 2019 Consumer Chart Monitoring Tool • Women's Specialty Holy Cross 2019 Program Specific Tool • Women's Specialty Holy Cross 2020 Interim Review Tool <p>Women's Specialty Services</p>	2=Full	

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

PIHP Name: Mid State Health Network	Date: July 14,2020
--	---------------------------

	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
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>		<ul style="list-style-type: none"> • Contract Boysville dba Holy Cross FY20SUD Treatment • FY20 SUD Provider Manual Final • Women's Specialty services Holy Cross FY21 Annual Plan document • Women's Specialty 2019 Consumer Chart Monitoring Tool • Women's Specialty Holy Cross 2019 Program Specific Tool • Women's Specialty Holy Cross 2020 Interim Review Tool <p>Women's Specialty Services</p>	2=Full	

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

PIHP Name: Mid State Health Network	Date: July 14,2020
--	---------------------------

	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
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>	<ul style="list-style-type: none"> • Women's Specialty Services 2.0 • HCS Handbook pg 6 • Holy Cross Screenshot Priority Populations • Holy Cross Care Logic Mngt. Assessment • Holy Cross Bio Assess pg 8-10 • Holy Cross Referrals Policy • Holy Cross Follow Up appointments • Holy Cross OB after visit transportation • Holy Cross 2019 Program Specific Tool • Holy Cross WS Group Curriculum • Holy Cross Transportation Request • Holy Cross Copy of IGT and Focus Group Schedule • Holy Cross Logic WSI Children Assess. • Holy Cross Care Logic Tx Diagnosis • 2019 Consumer Chart Monitoring Tool • FY20 SUD Provider Manual • Contract Boyssville FY20 	2= Full	

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

PIHP Name: Mid State Health Network	Date: July 14,2020
--	---------------------------

	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
12) Fetal Alcohol Spectrum Disorders (FASD) Prevention Activities	<p>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)</p> <p>MDHHS/PIHP Contract Boilerplate, section 33.1, Page 93</p>	Copies of Policies and Procedures	<ul style="list-style-type: none"> • Cherry Street Health Admissions • Holy Cross FASD Prevention Cherry Health Group Schedule • Cherry Health FASAD Pamphlet • Cherry Health FASD handout • 2019 Consumer Chart Monitoring • Holy Cross IGT and Focus group schedule • FY20 SUD Provider Manual <p>Contract Boysville dba Holy Cross FY20 Treatment</p>	2=Full	

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

PIHP Name: Mid State Health Network	Date: July 14,2020
--	---------------------------

	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
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	<ul style="list-style-type: none"> • Cherry Health Sickler • Cherry Health FASD tracking • Holy Cross Bio Assess page 10 • Holy Cross Referral for additional services • FY20 Provider Manual Contract Boysville dba Holy Cross 	2=Full	