

POLICIES AND PROCEDURE MANUAL

Chapter:	Quality		
Title:	Monitoring & Oversight of SUD Service Providers Procedure		
Policy: <input type="checkbox"/> Procedure: <input checked="" type="checkbox"/> Page: 1 of 3	Review Cycle: Annually Author: Director of Provider Network Management Systems	Adopted Date: 01.2016 Review Date: 1.2021 Revision Eff. Date:	Related Policies: Monitoring & Oversight Policy

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Purpose

The purpose of this procedure is to guide Mid-State Health Network (MSHN) in the process for conducting monitoring and oversight of the Substance Use Disorder Service Program (SUDSP) Provider Network to ensure compliance with federal and state regulations.

Procedure

In accordance with the MSHN Monitoring and Oversight Policy, MSHN will conduct an on-site review of the SUDSP Provider Network.

- A. The SUDSP monitoring schedule will be developed annually and distributed to the SUDSP’s according to the Monitoring and Oversight Policy.
- B. At least 30 days prior to the site review, MSHN will send out a review checklist to allow the SUDSP Provider Network sufficient time to prepare and to submit information prior to the site visit. The checklist will include at a minimum the following:
 - 1. List of agency contacts assigned to applicable site review areas
 - 2. List of current contracts grouped by contract type (e.g. Independent Clinicians, Prevention Providers, Subcontracts, etc.)
 - 3. Description of Critical Incident and/or Sentinel Event Review and Submission Process including root cause analysis as applicable.
 - 4. Agency Policy Regarding subcontracts (if applicable)
 - 5. Copy of Compliance Plan (if different than the MSHN Compliance Plan)
 - 6. List of Adverse Benefit Determination Notices, Grievance and Appeal case files to ensure compliance.
 - 7. List of Policies & Procedures
 - 8. List of MOU’s (e.g. Referral Agreements)
 - 9. Operations Manual (e.g. program mission/vision, treatment philosophies, and other information submitted to LARA for when applying for SA license)

- C. At least 15 business days prior to the review, MSHN will send a draft agenda for review and the following:

List of cases selected for review per facility/SUD license that include (treatment providers only):

1. Michigan Mission Based Performance Indicator System (MMBPIS) Selection –Performance Indicators (min.2-max.8) *Note:* Selection will include a review of two records for all indicators; however, one record may be applicable for more than one indicator.
2. Critical Incidents Selection (Residential only) – Critical Incidents (min.2- max.8)
3. Adverse Benefit Determination (ABD) Notice Selection – ABD (min.2-max.8)
4. Grievance & Appeal Selection – G&A (min.2-max.8)
5. Chart Review – Selection based on charts selected above. Additional charts may be selected to ensure a sufficient sample of all programs and chart areas will be reviewed. (e.g. MAT, WSS, Case Management, Peer Supports, Detox, Residential)

The site review will consist of utilizing the following review tools:

Treatment Programs

1. Program Specific – Review of the Michigan Department of Health & Human Services (MDHHS) Program Specific Requirements, Department of Licensing and Regulatory Affairs (LARA) and Mid-State Health Network Contract
2. Delegated Managed Care Functions – Review of the delegated managed care functions
3. Chart Review – Review of screening, assessment, individualized treatment plan, enrollee rights and clinical documentation;
4. Staff Training & Credentialing– Review of the credentialing and re-credentialing process, primary source verification, staff qualifications, and annual training
5. Adverse Benefit Determination, Grievance and Appeal– Tool
6. SUDSP Corrective Action Plan
7. Critical Incident Reporting System Review Tool
8. MMBPIS Sample Review Tool
9. Review of reporting requirements (as applicable)
10. Fiscal Monitoring Oversight

Prevention Programs

1. Prevention Program Tool:
 - a. Review of needs assessment data used to develop prevention priorities.
 - b. Review of activity sign-in sheets and any other evaluation data collected (i.e. pre/post-test, consumer satisfaction surveys, follow-up surveys)
 - c. Review of minutes for community meetings.
 - d. Review of Research you are basing your prevention activities on, and how you are providing programming based on fidelity.
 - e. Required units of service review
 - f. Review that services match the annual plan
 - g. Review of accuracy and timeliness of MPDS entry.
 - h. Review of any materials produced paid in full or part with Mid-State Health Network funding.
 - i. Staff Training & Credentialing – Review of the primary staff qualifications and annual training
2. SUDSP Corrective Action Plan
3. Group and Coalition Observation Review
4. Fiscal Monitoring Oversight

Note: Evidence listed on tools are examples of possible evidence – other evidence may be acceptable.

An entrance conference will be scheduled at the beginning of the review. The entrance conference will consist of a review of the agenda and materials that will be reviewed.

An exit conference will be scheduled at the end of the review to discuss a summary of the results of the review.

In accordance with the Monitoring and Oversight Policy, MSHN will provide the SUDSP a written report that includes the results of the review within 30 days of the conclusion.

A survey will be sent to the SUDSP within 30 days of completion to allow feedback regarding the site visit and to ensure MSHN provides an opportunity for continuous quality improvement.

Applies to

- All Mid-State Health Network Staff
- Selected MSHN Staff, as follows:
 - MSHN CMHSP Participants: Policy Only Policy and Procedure
- Other: Substance Use Disorder Sub-Contracted Providers

Definitions

LARA: Licensing and Regulatory Affairs
MDHHS: Michigan Department of Health & Human Service
MMBPIS: Michigan Mission-Based Performance Indicator System
MOU: Memorandum of Understanding
MPDS: Michigan Prevention Data System
MSHN: Mid-State Health Network
SUD: Substance Use Disorder
SUDSP: Substance Use Disorder Service Program
CIRS: Critical Incident Reporting System

Other Related Materials

- Prevention Program Monitoring Tool
- Treatment Program Specific Monitoring Tool
- Chart Review Monitoring Tool
- Delegated Managed Care Functions Monitoring Tool
- Staff Training Chart Review Tool
- Credentialing Chart Review Tool
- MMBPIS Review Tool
- Adverse Benefit Determination Tool
- Grievance and Appeal Review Tool
- Financial Review Tool
- CIRS Tool

References/Legal Authority

- The Code of Federal Regulations (CFRs),
- PIHP managed care administrative delegations made to the SUDSP
- PIHP/SUDSP contract
- PIHP policies, standards, and protocols, including both MDHHS and PIHP ‘practice guidelines.
- Medicaid Provider Manual
- Medicaid Managed Specialty Supports and Services Program
- Federal Procurement Guidelines (The Office of Federal Procurement Policy (OFPP) – Office of Management and Budget
- MSHN SUD Provider Manual
- LARA SUD Program Rules

Change Log:

Date of Change	Description of Change	Responsible Party
01.2016	New Procedure for SUDSP Site Reviews	Director of Provider Network Mgmt. Systems
03.20.17	Annual Review	Director of Provider Network Mgmt. Systems
03.2018	Annual Review	Director of Compliance, Customer Services & Quality
03.2019	Annual Review-Added financial monitoring language	Quality Manager
04.2020	Inclusion of required documentation for oversight	Quality Manager