

FISCAL INTERMEDIARY REGIONAL MONITORING SUMMARY

FY2018

Prepared by: MSHN Quality Assurance & Performance Improvement Department – September 2018

Approved by: FI Regional Monitoring Team – September 2018

# Overview

In 2017, the Mid-State Health Network (MSHN) Community Mental Health Service Providers (CMHSPs) agreed to the use of a regionally standardized contract and provider performance monitoring tools for fiscal intermediary (FI) services.

# Fiscal Intermediary Regional Monitoring Review Team

The monitoring team includes at least one representative from each CMHSP in the MSHN service area. The current review team includes:

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| Bay Arenac Behavioral Health | Sarah Holsinger |
| Community Mental Health Authority of Clinton, Eaton, and Ingham | Brittany Pazdan |
|  | Amber Covington |
|  | Brianne Haner |
|  | Mussa Maingu |
| Community Mental Health Central Michigan | Tonya Lawrence |
|  | Jennifer Dunlop |
|  | Arlene Faeth |
| Gratiot Integrated Healthcare Network | Pam Fachting |
| Huron Behavioral Health | Anthony Ferzo |
| LifeWays | Shannan Clevenger |
|  | Michael Cupp |
| Mid-State Health Network | Amy Dillon |
| Montcalm Care Network | Tammy Curtis |
| Newaygo County Mental Health | Christi Tank |
| Saginaw County Community Mental Health Authority | Monique Taylor-Whitson |
|  | Jennifer Keilitz |
| Shiawassee Health and Wellness | David Jenks |
|  | Dirk Love |
| The Right Door for Hope, Recovery, and Wellness | Linda McNett |
|  | Susan Richards |
| Tuscola Behavioral Health Systems | Syndi Neeb |

# Fiscal Intermediary Providers

CMHSPs within the MSHN region contracted with four FI’s in FY18. Onsite reviews were conducted at all four provider locations.

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| **Fiscal Intermediary Provider** | **CMHSP Contract** |
| BHT&D Gusco (Saranac, MI) | MCN |
| Community Living Network (Ypsilanti, MI) | CEI, LifeWays |
| Guardian Trac (Sturgis, MI) | CMHCM, HBH, TRD-HRW, TBHS |
| Stuart Wilson CPA PC (Midland, MI) | BABH, GIHN, CMHCM, NCMH, SCCMHA, SHW |

# Fiscal Intermediary Regional Monitoring Process

The FI Regional Monitoring team established FI specific review teams to plan, implement, and conduct monitoring for each FI. MSHN QAPI staff scheduled site visits, sent preparation emails, and held phone conferences and online meetings to assist the FIs in the review process.

Each review team member reviewed assigned sections of the review. QAPI combined the review documents and sent the final report draft for team approval. Once approved, the final report was sent to the FI with requests for Corrective Action Plans, as applicable.

Upon submission of Corrective Action Plans from FIs, the FI specific teams reviewed and approved the corrective action plans.

# Fiscal Intermediary Regional Monitoring Results

Of the 4 FIs reviewed, corrective action plans were requested and approved from each provider.

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| **Sections** | **Stuart Wilson CPA, PC** | **BHT&D Gusco** | **GT Independence** | **Community Living Network** | **Regional Compliance** |
| Pre-Audit-General | 100% | 100% | 95.83% | 100% | ***98.95%*** |
| Pre-Audit Staff Training | 57.52% | NA | 44.57% | 64.15% | ***55.41%*** |
| Participant File Review | 89.33% | 0% | 100% | 100% | ***72.33%*** |
| Staff File Review | 68.51% | NA | 90.91% | 93.68% | ***84.37%*** |
| QI and Performance Improvement | 50% | 75% | 100% | 100% | ***81.25%*** |
| Policies and Procedure | 100% | 100% | 96.67% | 100% | ***99.17%*** |
| Financial | 80% | 0% | 100% | 100% | ***70%*** |
| **Overall Compliance Score** | **71.77%** | **59.55%** | **75.71%** | **85.71%** |  |

## Notable Strengths

* All FIs maintain electronic documentation systems that allowed all staff to easily access files.
* BHT&D Gusco has recently implemented stronger Quality Improvement methods to ensure that customer feedback is utilized to improve processes.
* Community Living Network provided evidence of utilizing customer feedback to continuously improve processes.
* Guardian Trac recently transitioned to an electronic documentation system to improve efficiency and centralize documentation.
* Stuart Wilson staff regularly attends ongoing trainings for staff development opportunities to ensure the quality service for those they provide services.
* Review teams were asked to provide feedback related to the regional monitoring experience and indicated that it seemed to be more efficient for CMHSP staff and for Fiscal Intermediary staff.
* Fiscal Intermediary staff noted that the process of streamlining requirements and monitoring regionally is significantly helpful to their day to day tasks and support the regional efforts.

## Opportunities for Improvement

* Many of the FIs provide services for CMHSPs outside of the MSHN service area and it was found that all CMHSPs have different processes and procedures for FIs. The review team recommended to all FIs that they should work with CMHSPs and ensure that the regional contract requirements are in place and compliant.
* It was not always clear in the employee files if the employee provided transportation services and therefore reviewers found it difficult to determine compliance with automobile insurance documentation requirements.
* Required trainings for employees outlined on regional contract MSHN Training Grid attachment was not always evident in files reviewed.
* Some FIs did not have a clear process or knowledge of informing CMHSP staff when budgets were over or under 10%.
* While many CMHSPs maintain the function of providing training to staff of participants, FIs are responsible for tracking training to ensure compliance. This has not been fully implemented in FY18. However, corrective action plans indicate that FIs will work to improve tracking efforts to meet contract requirements.

# Fiscal Intermediary Satisfaction Survey Feedback

To ensure continuous quality improvement in the regional monitoring process, a customer service/satisfaction survey was created for FI providers to complete. A survey link was included in the final report email to the FI. Additionally, a reminder email was sent to FI providers requesting that they complete the survey link. Unfortunately, none of the FI providers completed the survey.

To encourage feedback from the FIs, the survey will be included in the Exit Conference allowing discussion and encouraging completion of the link when the FI staff receive it. Additionally, QAPI staff will send the survey link separate from the Final Report email.

Onsite discussion and email follow-up with FI staff included the following comments:

* Appreciate the regional review process as it saves staff time preparing for several reviews.
* Reviewers were helpful in explaining things.
* The preparation documents and online meeting before the review (to go over Box and the review tools) was helpful in preparing.
* Will work with contracted CMHSPs to implement processes that align with contract requirements.
* It was a smooth audit process for us.

# Fiscal Intermediary Review Team Feedback

QAPI asked for feedback from the review team regarding strengths of the process and areas for improvement.

## Strengths of Regional Monitoring Process

* Overall process was good.
* Appreciate hyperlinks to documents within Box- helpful and appreciated
* Desk and Site reviews have been positive experience
* Regional monitoring makes sense as we are eliminating several CMHSPs in the region monitoring the same provider

## Opportunities for Improvement within Regional Monitoring Process

* Box was challenging sometimes navigating the subfolders
* As a region, we should provide more clarification to FIs regarding the regional contract purpose and the requirements. It appears some FIs and CMHSPs were not following the requirements as outlined in the contract. Since this was the first year of the regional contract it may just be a period of adjustment.
* It doesn’t seem necessary to go onsite now that we have learned most have electronic systems that are accessible or can provide the information in Box for review. Maybe consider desk reviews for future reviews?

FY19 Regional FI Monitoring

## Planning

The FI review team held a meeting on September 19th, 2018 to discuss pros and cons of the regional monitoring as it relates to a CMHSP/reviewer perspective. Additionally, discussion included a review of FY19 contract changes and review tool changes/updates, along with review of the FY19 schedule for reviews.

The full FI Review team will meet February 12, 2019 to go over the specifics of the review process and roles/responsibilities as it relates to the interim desk reviews and full review of the new provider.

## FY19 Tool Changes

Tool changes were made based on feedback from reviewers throughout FY18. The changes included an update to sources and references, revised location/format of the tool to align with flow of review, added staff training revisions based on MSHN Training Grid, removed standards found to be not applicable, and updates to standard language for clarification.

## FY19 Review Schedule

Interim reviews will be held via desk audit. As outlined in the MSHN Regional Provider Monitoring and Oversight policy, the review will ensure that any corrective action submitted and approved in 2018 was implemented by the FI in 2019 in addition to a review of any identified new standards.

In addition to the four (4) interim reviews, one (1) full review will be conducted for Consumer Direct. Consumer Direct is a newly contracted FI. The date on the schedule is tentative based on consumers served at the time. Consumer Direct does not have a Michigan office, but has a Michigan employee. The Consumer Direct review will take place via desk review which will allow reviewers the opportunity to provide feedback to the team about the pros and cons of desk review experience as it relates to a full desk review vs full site review.

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| **Fiscal Intermediary** | **Type of Review** | **Monitoring Date(s)** |
| **Stuart T. Wilson CPA PC** | Interim | Wednesday, May 8, 2019 |
| **Guardian Trac** | Interim | Tuesday, June 4, 2019 |
| **Community Living Network/Community Alliance** | Interim | Monday, June 24, 2019 |
| **BHT&D Gusco** | Interim | Tuesday, May 21, 2019 |
| **Consumer Direct Michigan** | Full | Tuesday, June 25, 2019 |