### Mid-State Health Network

SUDSP QAPI Review Process and Review Tool Changes for 2020

12/2019 Provider Meeting

# MSHN Quality Oversight Policy & Procedures

- MSHN QAPI team conducts full reviews every other year and partial reviews (corrective action follow up and any new standards) during the interim years. Additional reviews are conducted as necessary
- MSHN Review Tools are located on the MSHN website
- MSHN policy and procedures are available on the MSHN website
  - Quality Monitoring & Oversight Policy
    - Monitoring & Oversight of SUD Service Providers Procedure
  - Policy #611 Quality- Medicaid Event Verification
    - ▶ Medicaid Event Verification <u>Procedure</u>

### MSHN SUD Quality Assurance Review Tools

#### **SUD Treatment Provider Review Tools**

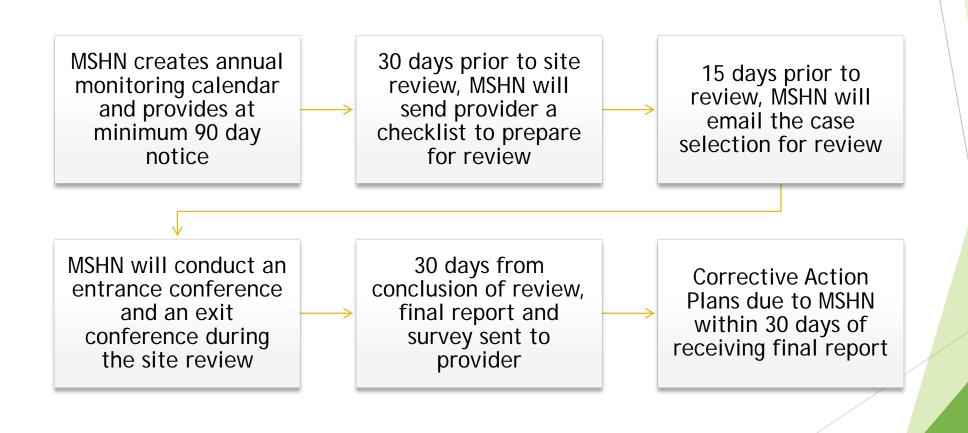
- 1. Program Specific Review of the Michigan Department of Health & Human Services (MDHHS) Program Specific Requirements, Department of Licensing and Regulatory Affairs (LARA) and Mid-State Health Network Contract
- 2. Delegated Functions Review of the delegated managed care functions and how those are implemented including policies and procedures
- 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 and documentation, primary staff qualifications and annual training
- 5. Performance Indicators- A selection of reported Performance indicators will be chosen and reviewed for accuracy.
- 6. Financial Review- Review of financial processes and documentation conducted by MSHN Financial Specialist

### Tips for Preparing for an Audit

- Upload all completed requested tools in the timeframe required
- Conduct a pre-review using the MSHN Review tools
- Have all documentation uploaded in advance in Box by the requested timeframe
- Have all documentation for the on-site review prepared and available for reviewers
- If you have an EMR, have username and password set up for reviewers prior to reviewers being on site.
- Utilize the checklists provided.
- Contact QAPI if there are any questions while preparing.



### **QA Review Timeline and Process**



# Delegated Managed Care Tool Changes

### Individualized Treatment & Recovery Planning

#### Overview of Changes:

- ► 6.1-6.8 revised standard language to align with source requirements. Updated sources.
- 6.9- Removed standard as determined no longer applicable.
  - Medical necessity for services is not required to be on treatment plan; however, mention of changes to be documented are.
  - ► FY19 Standard Language: Medical Necessity for services, and changes of, are documented and justified in the individualized treatment plan reviews.
- ▶ 6.11-6.14- renumbered standards as needed. Revised standard language to align with requirements for clarification.

### Coordination of Care

- Overview of Changes:
  - ▶ 7.3 Removed standard. Verified in Customer Service section
    - ► FY19 7.3 Standard Language: Program keeps a maintained list of resources available includes: names, location, types of services resource will provide, resources' criteria for determining eligibility.
  - ▶ 7.5 Revised source

## Program Specific Tool Changes

#### **ASAM**

- Overview of Changes:
- ▶ 1.1- Removed standard duplicative and reviewed in other areas (Charts, MEV)
  - ► FY19 Standard Language: Service hours are consistent with the requirements indicated by the approved LOC determination.
- 1.2- Added standard
  - ► FY20 Language: Access system provides appropriate responses based on presenting circumstances and/or referral requirements Priority population status. Reviewer will look for all components including guidelines for interim service(s).
- ▶ 1.3- Removed standard combined with 1.2 and reviewed in other tools
  - ► FY19 Standard Language: There is evidence provider has appropriate processes in place to ensure ASAM LOC Determinations are accurate, change when consumer's status changes, and ASAM is used to fidelity in all situations.

- Overview of Changes:
- ▶ 2.1- Removed standard. Standard has been reviewed for at least 2 review years and no longer relevant to review.
  - ► FY19 Standard Language: Provider has deleted any program materials that reference short/long-term programming & implemented into practice.
- 2.2- Removed standard as duplicative and verified in other areas of review.
  - ► FY19 Standard Language: Service hours are consistent with the requirements indicated by the approved LOC Determination.

- Overview of Changes: continued....
- ➤ 2.4-2.6- Removed standards. This is reviewed bi-annually by MDHHS as part of ASAM application/designation process.
  - ▶ 2.4 FY19 Standard Language: Provider has evidence of required supports in place. (Example: 3.1 Supports = 24/7 consultation ability with physician & emergency services.
  - ▶ 2.5 FY19 Standard Language: Provider has evidence that required staffing is in place.
  - 2.6 FY19 Standard Language: Provider has evidence that required Co-occurring programming elements are in place.

- Overview of Changes: continued...
- 2.7- Removed standard. Language included in ASAM Standard 1.2
  - ► FY19 Standard Language: Provider has clear protocols for documenting level of care service provisions based on individualized assessment, diagnosis, ASAM Placement Criteria.

### Case Management

- Overview of Changes:
- ▶ 3.1- Removed standard. Not necessary to review as identified in Provider Manual.
  - ► FY19 Standard Language: Provider can demonstrate policy/procedures are in place to inform clinical recommendation for case management as medically necessary & appropriate based on identified domain in community, relapse history, need for long-term care, and severity of diagnosis.
- 3.2- Moved to Chart Review Tool
  - ▶ FY19 Standard Language: Services occur in the home/community & not just office
- ▶ 3.3- Removed standard. Not necessary to review as identified in Provider Manual.
  - ► FY19 Standard Language: Provider has procedures in place to ensure coordination of care, planning and monitoring of recovery services.

### Women's Specialty Services Designated

- Overview of Changes:
- ▶ 5.3- Revised standard to align with language in Treatment Policy 12.
- 5.4- Removed standard. Combined with revised standard 5.3
  - ► FY19 Standard Language: Guidelines in place that ensure: Women receive primary medical care/prenatal care/pediatric care for children, Children receive therapeutic interventions, Sufficient case management, Childcare, Transportation

### Women's Specialty Services Enhanced

- Overview of Changes:
- ▶ 5.5-5.10- Removed standards. Tx to include in annual plans.
  - ▶ 5.5 FY19 Standard Language: Provider has mechanism for determining eligibility for enhanced women's services which includes: Pregnant, Post-partum (up to 12months)
  - ▶ 5.6 FY19 Standard Language: Consumers receive information about the program that includes: Engagement & Reengagement Practices, Focus on Effective Contraceptive(s), Focus on access & use of community-based services(include transportation), Services occur in the home/community & not just office
  - ▶ 5.7 FY19 Standard Language: Maintain engaged & consistent contact for at least 18 to 24 months in a home visitation/community based services model, expandable up to three years.\*Or demonstration of consistent attempts to engage.
  - ▶ 5.8 FY19 Standard Language: Supervision is provided at least 2 times per month.
  - 5.9 FY19 Standard Language: Require maximum case load of 15 per peer advocate.
  - ▶ 5.10 FY19 Standard Language: Develop referral agreement with community organization(s) to provide family planning options & instruction.

## Chart Review Tool Changes

### Individualized Treatment/Recovery Planning & Documentation

- Overview of Changes:
- 2.1- Revised standard for clarification.
- 2.2- Updated Source
- 2.3- Moved to Delegated Functions Tool
- ▶ 2.3- Revised standard for clarification and updated source
- 2.4- Added Gambling to standard
  - ► FY20 Standard Language: Plan(s) address needs/issues identified in assessment(s) (or clear documentation of why issue is not being addressed) including but not limited to:
    - Substance Use Disorder(s)
    - Medical/Physical Wellness
    - ► Co-Occurring D/O
    - History/Risk/Present Trauma
    - Gambling

### Individualized Treatment/Recovery Planning & Documentation

- Overview of Changes:
- ▶ 2.5- Revised language in standard to align with source language
- ▶ 2.6- Removed standard as included in 2.5
  - ► FY19 Standard Language: Goals & Objectives are: Specific Individualized, Concise, Clear; Measurable; Attainable; Realistic/Relevant; Timely
- ▶ 2.7- Removed standard. Unable to confirm source or requirement.
  - ► FY19 Standard Language: Services/supports/interventions identified in the individualized treatment plan assist the individual in pursuing outcomes consistent with their preferences and goals and; Provider utilizes evidence-based practices & programming to fidelity.
- ▶ 2.8- Added language to standard for clarification and to align with language in source. Updated source.

### Individualized Treatment/Recovery Planning & Documentation

- Overview of Changes:
- ▶ 2.9- Revised language to align with language in source for clarification
- ▶ 2.10- Removed standard. Reviewed in other areas of review tools.
  - ▶ FY19 Standard Language: If Gambling disorder is identified, then Goal for Gambling Disorder is included on the treatment plan. OR There is documentation that consumer refused a gambling disorder goal and if so, the record includes evidence that provider made a referral to the Gambling Helpline. (Only applicable if the person screened/assessed positively for GD).
- ▶ New Standard- Case Management moved from Program Specific Tool.
  - ▶ 2.8 FY20 Standard Language: Case Management Services occur in the home/community & not just office.

### Record Documentation & Progress Notes

- Overview of Changes:
- ▶ 3.1- Updated source
- ▶ 3.2- Removed standard. Included in standard in section
  - ► FY19 Standard Language: Adjustments are made to the treatment/service plan(s) based on additional/changing needs, goals, or objectives identified throughout the episode of care.
- 3.3- Removed standard- included in MEV review.
  - ► FY19 Standard Language: Documents include all required signature(s), qualifications and dates.
- 3.4- Removed standard- included in MEV review.
  - ► FY19 Standard Language: Documentation supports the billed service:
    - progress note completed for all billed services (non-Medicaid funded).
    - Documentation justifies payment(s)
    - Documentation includes both provider and consumer participation

### Coordination of Care

- Overview of Changes:
- ▶ 4.1- Revised standard to align with requirements. Updated source and evidence.
- ► 4.4- updated source

### Discharge/Continuity of Care

- Overview of Changes:
- ► 5.3- Removed standard as verified and reviewed in other areas of tool.
  - ► FY19 Standard Language: Ensure gambling disorder information is included as is applicable. If Gambling Disorder identified, discharge includes documentation that
    - ► GD goal was in TX plan
    - ▶ Referral was made to helpline

- Overview of Changes:
- ▶ 6.1- Revised language of standard to align with new admin rules. Updated source.
- ▶ 6.2- Revised standard and source for clarification and current requirements
- ▶ 6.3- Added language for clarification.

### Women's Specialty Services Designated & Enhanced

- Overview of Changes:
- ▶ 8.2- Removed standard. Duplicate standard. Covered in 8.4
  - ► FY19 Standard Language: Evidence consumer received supports for birth control/family planning, pregnancy, postpartum and/or parenting issues.
- ▶ 8.4- Added language for clarification

### Women's Specialty Services Designated & Enhanced

- Overview of Changes: continued....
- 8.5-8.8- Tx to add standards to annual plan review
  - ▶ 8.5 There is documentation of consistent attempts to engage client in services for a period of not less than 18 months.
  - ▶ 8.6 There is documentation that services focus on eliminating or reducing the use of alcohol or drugs by both the client and her children.
  - ▶ 8.7 There is documentation that effective use of contraceptive methods is promoted and addressed within treatment.
  - ▶ 8.8 There is documentation of action steps taken to teach client how to effectively use community-based service providers.

### **Recovery Housing**

- Overview of Changes:
- 9.1- Added Clarification to evidence column

9.1 Documentation of eligibility is evidenced by:  • File includes verification of REMI admission from the Outpatient Provider.  • Housing Need identified & documented in clinical records as necessary for best recovery outcomes  MSHN Technical Advisory on Housing, Treatment TA  #11, NARR guidelines  Outpatient provider verification of admission (OPT provider REMI admission), Verification on TECC form of date of admission to Outpatient provider as provided by OPT	#	Standard/Elements	Source/Basis	Evidence May Include
	9.1	<ul> <li>File includes verification of REMI admission from the Outpatient Provider.</li> <li>Housing Need identified &amp; documented in clinical</li> </ul>	on Housing, Treatment TA	charts Outpatient provider verification of admission (OPT provider REMI admission), Verification on TECC form of date of admission to Outpatient provider as

### Upcoming Opportunities for Training on Site Review Tools

- QAPI year end data, from provider site reviews, indicated some areas in need of further support/clarification to include:
  - Individualized Treatment & Recovery Planning
  - Coordination of Care
  - Discharge & Continuity Planning
  - Case Management
  - Peer Recovery Supports
  - Women's Specialty Services
- MSHN Clinical Teams planning to support webinar trainings in FY20 on these topics on a monthly/bi-monthly basis
  - ▶ First topic planned for FY20: Coordination of Care & Discharge/Continuity of Care
  - ▶ Targeting February 2020; will release info in Constant Contact when finalized.
- MSHN Financial Specialist will conduct webinar training on the financial review tools for providers early 2020