| Regional Monitoring of Autism Benefit – Applied Behavioral Analysis | | | |
|---|--|--|--|
| PROVIDER: | DATE OF REVIEW: Click or tap to enter a date. | | |
| NAMES OF REVIEWERS: | DATE REPORT SENT TO PROVIDER: Click or tap to enter a date. | | |
| CORRECTIVE ACTION REQUIRED: 🗌 Yes 🔲 No | CORRECTIVE ACTION DUE DATE: Click or tap to enter a date. | | |
| CORRECTIVE ACTION ACCEPTED: 🗌 Yes 🗌 No | DATE CORRECTIVE ACTION ACCEPTED: Click or tap to enter a date. | | |

| Standard | Source | Evidence may | Score | Evidence Found, |
|----------|--------|--------------|-------|-----------------|
| | | include | | Notes, Comments |

| AUTISM | A BENEFIT/APPLIED BEHAVIORAL ANALYSIS | | | |
|--------|---|---|---|---|
| 1.1 | Beneficiaries IPOS addresses the needs. A. As part of the IPOS, there is a comprehensive individualized ABA behavioral plan of care that includes specific targeted behaviors for improvement, along with measurable, achievable, and realistic goals for improvement. B. The IPOS must address risk factors identified for the child and family, specify how the risk factor may be minimized and describe the backup plan for each identified risk. | Medicaid Provider Manual MHSA Section 18 | Policy & Procedure Consumer Chart | □ Yes (2) □ No (0) □ Partial (1) □NA |
| 1.2 | Beneficiaries services and supports are provided as specified in the IPOS, including: A. Amount B. Scope C. Duration | Medicaid Provider Manual MHSA Section 18 | Policy/Procedure Consumer Chart | □ Yes (2) □ No (0) □ Partial (1) □NA |
| 1.3 | Beneficiaries BHT authorization was completed by Utilization Management (UM) staff who are free from conflict of interest as evidenced by documentation that the staff does not provide any other service to that beneficiary. | Medicaid Provider Manual MHSA Section 18 | Policy/Procedure Consumer Chart | □ Yes (2) □ No (0) □ Partial (1) □NA |
| 1.4 | Beneficiaries ongoing determination of level of service (every six months) has evidence of measurable and ongoing improvement in targeted behaviors as demonstrated with | Medicaid Provider Manual MHSA Section 18; DCH Site Review | Policy/Procedure Consumer Chart | □ Yes (2) □ No (0) □ Partial (1) |

CMHSP Program Specific Tool; QAPI, 12.5.18

| | Standard | Source | Evidence may include | Score | Evidence Found, Notes, Comments |
|------|---|--|--|--|------------------------------------|
| | | | | | |
| | ABLLS-R or VB-MAPP or other appropriate documentation of analysis (i.e. graphs, assessment reports, records of service, progress reports, etc.). | Protocol for Autism Beneficiaries; Contract SOW III.h | | | |
| 1.5 | Beneficiaries whose average hours of ABA services during a quarter were within the suggested range for the intensity of service plus or minus a variance of 25%. | Medicaid Provider Manual MHSA Section 18 | Policy/Procedure Consumer Chart | ☐ Yes (2) ☐ No (0) ☐ Partial (1) ☐ NA | |
| 1.6 | Evidence of Corrective Action in response to the MDHHS ASD Site Review. | | Most Recent MDHHS ASD Site Review, Corrective Action Plan, Evidence of Implementation | □ Yes (2) □ No (0) □ Partial (1) □NA | |
| 1.7 | Observation Ratio: Number of Hours of ABA observation during a quarter are \geq to 10% of the total service provided. | MSA 1559 Policy SOW III.b. | Policy/Procedure | ☐ Yes (2) ☐ No (0) ☐ Partial (1) ☐ NA | |
| PROV | DER QUALIFICATIONS/CREDENTIALING | | | | |
| 2.1 | Provider follows a documented process consistent with State requirements for credentialing and re-credentialing of providers. | Medicaid Provider Manual MHSA Section 18 <u>BHT Service</u> <u>Provider Qualifications</u> (See Behavior Technician, pgs. 8-9) 40-hour requirement documentation found: <u>http://www.michigan.gov/doc</u> <u>uments/autism/BHT-</u> <u>ABA Services Qualified Provi</u> <u>ders 510149 7.pdf</u> | Sample of employee credentialing records to confirm credentials and PSV. Staff at all levels (BCBA, BCaBA, QBHP, LP-LLP, QLP, BT, etc.) must meet the standards for to mark "yes" for each case sample. | ☐ Yes (2) ☐ No (0) ☐ Partial (1) ☐ NA | |
| 2.2 | Credentials are verified, by primary source, prior to employment. This includes criminal background and central registry checks (CR if working with minors/children) for any staff having direct access to consumers served. | Public Act 218 of 1979, MCL 400.734 (b) MSHN AFP response Section 2.4.5 PIHP Contract FY19 | Policy/Procedure Sample of records | □ Yes (2) □ No (0) □ Partial (1) □NA | |
| 2.3 | Prior to employment, the Provider verifies that the individual is not included in any excluded or sanctioned provider lists. The Provider shall search the OIG, GSA/SAM and Michigan | MDHHS Credentialing Policy | Policy/Procedure Sample of records | □ Yes (2) □ No (0) □ Partial (1) | |

| | Standard | Source | Evidence may include | Score | Evidence Found, Notes, Comments |
|-------|---|---|---|--|------------------------------------|
| | Sanction Provider database monthly to capture exclusions and reinstatements that have occurred since the last search | MSHN Background Check and PSV Policy | | □ NA | |
| | | <u>Michigan Sanctioned</u> Provider Site | | | |
| 2.4 | Minimum training standards are met based on the MSHN regional training requirements and is documented in the staff file. | Contract section 18 – Staffing and Training Requirements | Training logs or transcripts; Sample of employee training records | ☐ Yes (2) ☐ No (0) ☐ Partial (1) ☐ NA | |
| 2.5 | Provider has a written system in place for credentialing and recredentialing licensed health care professionals in accordance with BHDDA credentialing and recredentialing processes | BHDDA P7.1.1 Contract Section 17.d. | Policy/Procedure | ☐ Yes (2) ☐ No (0) ☐ Partial (1) ☐ NA | |
| 2.6 | Individuals transporting consumers hold a valid driver's license appropriate to the class of vehicle being operated | Medicaid Provider Manual – NEMT; Michigan Vehicle Code Act 300 of 1949 | Policy/Procedure Personnel records – copy of driver's license | □ Yes (2) □ No (0) □ Partial (1) □NA | |
| Gener | al Administration | | | | |
| 3.1 | Provider maintains the following insurance policies: General Commercial Liability, with PAYOR listed as additionally insured Professional Liability insurance current Motor Vehicle Liability (if transporting consumers), with PAYOR listed as additionally insured Worker's Compensation | Contract (section 13) | Policy certificate – can be obtained from PAYOR Contract Manager | □ Yes (2) □ No (0) □ Partial (1) □NA | |
| 3.2 | Provider maintains a Compliance Plan which meets the following elements: Employee/contractor code of conduct Employee education program(s); training and education of the compliance officer and employees Communication processes between senior management and employees regarding compliance program; designation of compliance officer | Contract (section 22 – Compliance Program), 42 CFR 438.608 | Compliance Plan | □ Yes (2) □ No (0) □ Partial (1) □NA | |

| | Standard | Source | Evidence may include | Score | Evidence Found, Notes, Comments |
|--------|---|--|-------------------------|--|------------------------------------|
| | Guidance and reporting system Prompt investigation and complaint resolution processes Corrective action planning and implementation Data monitoring and evaluation | | | | |
| 3.3 | Provider has safeguards established that restrict the use or disclosure of information concerning Consumers. | Contract (section 21 – Consumer Medical Records) Mental Health Code, Section 748, 748a, and 750 | Policy/Procedure | □ Yes (2) □ No (0) □ Partial (1) □NA | |
| 3.4 | Provider has a provision for the disposal of consumer protected health information (PHI) that will render the documents unreadable, indecipherable, and otherwise cannot be reconstructed. | HITECH Act, Contract (Section 22 - HIPAA) | Policy/Procedure | □ Yes (2) □ No (0) □ Partial (1) □NA | |
| 3.5 | Provider maintains a comprehensive individual service record system. | Contract (section 21 – Consumer Medical Records), MDHHS Medical Services Administration (MSA) Policy Bulletin Chapter 1, the MDTMB Retention General Schedule #20 Community Mental Health Programs | Policy/Procedure | □ Yes (2) □ No (0) □ Partial (1) □NA | |
| 3.6 | Provider shall maintain a fully operational internal Quality Assessment and Performance Improvement Program | Contract section 24 – Quality Improvement Program, Site Reviews, Performance Monitoring | QAPIP | ☐ Yes (2) ☐ No (0) ☐ Partial (1) ☐ NA | |
| Recipi | ent Rights | | | | |
| 4.1 | Were rights books provided to consumers and readily available for review? | Contract, section 19 – Recipient Rights | | □ Yes (2) □ No (0) □ Partial (1) | |

| Standard | Source | Evidence may | Score | Evidence Found, |
|----------|--------|--------------|-------|-----------------|
| | | include | | Notes, Comments |

| 4.2 | Did the rights books provide the correct information for contacting the appropriate Rights Office? | Contract, section 19 – Recipient Rights | □ Yes (2) □ No (0) □ Partial (1) □NA |
|-----|--|--|--|
| 4.3 | Are posters providing contact information for the Rights Office conspicuously posted and visible to consumers and staff? (not applicable to SIP sites) | Contract, section 19 – Recipient Rights | □ Yes (2) □ No (0) □ Partial (1) □NA |
| 4.4 | Did the posters provide the correct information for contacting the appropriate Rights Office? | Contract, section 19 – Recipient Rights | □ Yes (2) □ No (0) □ Partial (1) □NA |
| 4.5 | The most current version of the Abuse and Neglect Reporting Posters are posted where staff can see them. | Contract, section 19 – Recipient Rights | □ Yes (2) □ No (0) □ Partial (1) □ NA |
| 4.6 | Were complaint forms readily available? | Contract, section 19 – Recipient Rights | ☐ Yes (2) ☐ No (0) ☐ Partial (1) ☐ NA |
| 4.7 | Were recipients aware of how to file a complaint? | Contract, section 19 – Recipient Rights | □ Yes (2) □ No (0) □ Partial (1) □ NA |
| 4.8 | Were staff aware of how to file a complaint? | Contract, section 19 – Recipient Rights | □ Yes (2) □ No (0) □ Partial (1) □NA |
| 4.9 | Were copies of Chapter 7 and 7A available? | Contract, section 19 – Recipient Rights | □ Yes (2) □ No (0) □ Partial (1) □NA |

| | Standard | Source | Evidence may | Score | Evidence Found, |
|--------|---|-------------------------|------------------|--------------------|-----------------|
| | | | include | | Notes, Comments |
| | | | • | | |
| 4.10 | Were any exclusions to items able to be brought into the site | Contract, section 19 – | | 🗆 Yes (2) | |
| | (contraband) posted and visible to consumers and visitors? | Recipient Rights | | 🗆 No (0) | |
| | | | | 🗆 Partial (1) | |
| | | | | □NA | |
| 4.11 | Were records and other confidential information secured and | Contract, section 19 – | | 🗆 Yes (2) | |
| | not open for public inspection? | Recipient Rights | | 🗆 No (0) | |
| | | | | \Box Partial (1) | |
| | | | | □NA | |
| 4.12 | Were any health or safety concerns identified during the visit? | Contract, section 19 – | | 🗆 Yes (2) | |
| | | Recipient Rights | | 🗆 No (0) | |
| | | | | \Box Partial (1) | |
| | | | | □NA | |
| 4.13 | Were appropriate accommodations made for persons with | Contract, section 19 – | | 🗆 Yes (2) | |
| | physical disabilities? | Recipient Rights | | 🗆 No (0) | |
| | | | | 🗆 Partial (1) | |
| | | | | □NA | |
| 4.14 | Documentation that staff received RR training within 30 days of | Contract Attachment G | Policy/Procedure | 🗆 Yes (2) | |
| | hire was reviewed? | | | 🗆 No (0) | |
| | | | | 🗆 Partial (1) | |
| | | | | □NA | |
| Limite | d English Proficiency & Cultural Competence | | | | |
| 5.1 | The provider has an administrative policy and procedure in | MDHHS Contract 3.4 | | □ Yes (2) | |
| | place for identifying and assessing the language needs of | MSHN LEP Policy | | 🗆 No (0) | |
| | individuals served, including: | , | | Partial (1) | |
| | | | | | |
| 5.2 | • The provider has a written policy and/or procedure on | MSHN LEP Policy | | □ Yes (2) | |
| | accessing oral interpretation services, free of charge to | 1 | | □ No (0) | |
| | consumers. | | | \Box Partial (1) | |
| | | | | | |
| 5.3 | The provider notifies the consumer that oral | MSHN LEP Policy | | □ Yes (2) | |
| _ | interpretation is available for any language, and written | | | \square No (0) | |
| | information is available in prevalent languages; and | | | \Box Partial (1) | |
| | how to access those services | | | | |
| | | | | | |

| | Standard | Source | Evidence may | Score | Evidence Found, |
|-------|--|--------------------------------------|------------------------|--|-----------------|
| | | | include | | Notes, Comments |
| | | | | | |
| 5.4 | • Written materials are available in alternative formats and in an appropriate manner that takes into consideration the special needs of those who are visually limited or have limited reading proficiency, as required by ADA | MSHN LEP Policy | | □ Yes (2) □ No (0) □ Partial (1) □NA | |
| 5.5 | • The provider has available for consumers, copies of PIHP developed written information in prevalent non- | MDHHS Contract 6.3.2 | | □ Yes (2) □ No (0) | |
| | English languages in its particular service area. | MSHN LEP Policy | | □ Partial (1) □NA | |
| 5.6 | Provider developed written material (if any) must use easily understood language and format available in | MDHHS Contract 3.6.2 | | □ Yes (2) □ No (0) | |
| | alternative formats and in an appropriate manner that takes into consideration the special needs of those who are visually limited or have limited reading proficiency | MSHN LEP Policy | | □ Partial (1) □NA | |
| 5.7 | The provider has a written policy or procedure on cultural diversity | MSHN Cultural Competency Policy | | □ Yes (2) □ No (0) □ Partial (1) □NA | |
| 5.8 | Services are delivered in a culturally diverse manner to all consumers including those with limited English proficiency and diverse cultural and ethnic backgrounds. The provider: Demonstrates an ongoing commitment to linguistic and cultural diversity that ensures access and meaningful participation for all people in the service area Includes acceptance and response for the cultural values, beliefs and practices of the community Applies an understanding of the relationships of language and culture to the delivery of supports and services. | MSHN Cultural Competency Policy | | ☐ Yes (2) ☐ No (0) ☐ Partial (1) ☐ NA | |
| Docun | nentation/Reporting Requirements | | | | |
| 6.1 | Transportation Logs include name of transporter and if ABA services were provided during transport. If ABA services are provided by BT, the name of the BT and name of transporter is included. | Contract; Statement of Work III.a | Transportation logs | □ Yes (2) □ No (0) □ Partial (1) □NA | |

| Standard | Source | Evidence may | Score | Evidence Found, |
|----------|--------|--------------|-------|-----------------|
| | | include | | Notes, Comments |

| 6.2 | Supervision Logs indicate date, duration, and content of supervision; supervision name and signature; staff name, client name | Contract; Statement of Work III.b | □ Yes (2) □ No (0) □ Partial (1) □ NA |
|-----|---|--------------------------------------|--|
| 6.3 | Family Training Progress Notes include date, content, duration, and signature of family member receiving training and staff providing training. | Contract; Statement of Work III.c | □ Yes (2) □ No (0) □ Partial (1) □NA |
| 6.4 | Social Skills Group Progress Notes indicate date, content, and duration of session, signature of BHT supervisors | Contract; Statement of Work III.d | □ Yes (2) □ No (0) □ Partial (1) □ NA |
| 6.5 | Group adaptive behavior progress note includes date, content, duration of session, and signature of technician providing the service. | Contract; Statement of Work III.e | □ Yes (2) □ No (0) □ Partial (1) □NA |
| 6.6 | Telepractice services are pre-authorized in the IPOS and with MDHHS prior to service being rendered. | Contract; Statement of Work III.f | ☐ Yes (2) ☐ No (0) ☐ Partial (1) ☐ NA |
| 6.7 | ABA exposure adaptive treatment - double staffing notes include dated, duration of session, and signature of both rendering providers. | Contract; Statement of Work III.g | □ Yes (2) □ No (0) □ Partial (1) □ NA |

| TRAINING | Days upon hire | Dates of Training |
|--|-------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|
| Recipient Rights - Basic Training | 30 | Initial Refresher |
| Healthy Insurance Portability and Accountability Act (HIPAA) | 30 | Initial |

| | Standard | Source | Evidence may | Score | Evidence Found, |
|--|----------|--------|--------------|-------|-----------------|
| | | | include | | Notes, Comments |

| | | Refresher |
|--|---------------------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|
| Person Centered Planning (BT – includes beneficiary IPOS) | Prior to serving | Initial |
| | client | Refresher |
| Cultural Competency/Diversity | 1 yr | Initial |
| | | Refresher |
| Limited English Proficiency | 90 | Initial |
| | | Refresher |
| CPR | 30 | Initial |
| | | Refresher |
| Health Management/Blood Borne Pathogens | 30 | Initial |
| | | Refresher |
| Environmental Safety | 1 yr | Initial |
| Corporate & Regulatory Compliance | 90 | Initial |
| | | Refresher |
| Medication Administration (if passing meds) | 90 | Initial |
| | | Refresher |
| Trauma Informed Care | 90 | Initial |
| Appeals and Grievances (BCaBA, BCBA, LLP, QBHP, QLP only) | 90 | Initial |
| | | Refresher |
| Non-Physical Intervention | 90 | Initial |

| Standard | Source | Evidence may | Score | Evidence Found, |
|----------|--------|--------------|-------|-----------------|
| | | include | | Notes, Comments |