



QUALITY ASSESSMENT AND PERFORMANCE IMPROVEMENT PROGRAM (QAPIP)

Annual Plan FY2025

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I. OVERVIEW

Mid-State Health Network (MSHN) is a regional entity, which was formed pursuant to 1974 P.A. 258, as amended, MCL §330.1204b, as a public governmental entity separate from the CMHSP Participants that established it. The CMHSP Participants formed Mid-State Health Network to serve as the prepaid inpatient health plan (“PIHP”) for the twenty-one counties designated by the Michigan Department of Health and Human Services as Region 5.

Effective January 2014, MSHN entered into its first contract with the State of Michigan for Medicaid funding, and entered into subcontracts with the CMHSPs in its region for the provision of Mental Health, Substance Use Disorder, and Developmental Disabilities services. The contract was expanded in 2014 to include an expanded Medicaid benefit, the Healthy Michigan Plan. The CMHSP Participants include Bay-Arenac Behavioral Health Authority, Clinton-Eaton-Ingham Community Mental Health Authority, Community Mental Health for Central Michigan, Gratiot Integrated Health Network, Huron Behavioral Health, LifeWays Community Mental Health Authority, Montcalm Care Network, Newaygo County Community Mental Health Authority, Saginaw County Community Mental Health Authority, Shiawassee Health and Wellness, The Right Door and Tuscola Behavioral Health Systems. Effective October 1, 2015, MSHN took over the direct administration of all public funding for substance use disorder (SUD) prevention, treatment and intervention within the region and expanded the provider network to include SUD providers.

The mission of Mid State Health Network (MSHN) is to ensure access to high-quality, locally delivered, effective and accountable public behavioral health and substance use disorder services provided by its participating members. The vision of MSHN is to continually improve the health of our communities through the provision of premiere behavioral healthcare and leadership.

The Midstate Health Network utilizes the National Healthcare Reform Framework the “Quintuple Aim”. For MSHN, the quintuple aim includes five strategic priorities: “Better Health”, “Better Care”, “Better Value”, “Better Provider Systems”, and “Better Equity”. MSHN organizes and empowers a network of publicly funded community partnerships essential to ensure quality of life while efficiently and effectively addressing the complex needs of the most vulnerable citizens in our region.

The MSHN Quality Assessment and Performance Improvement Program (QAPIP) provides a comprehensive program and structure for quality improvement in alignment with the MSHN Strategic Plan through performance monitoring. Additionally, the MSHN QAPIP aligns with the quality assessment and performance improvement program interventions as identified in the Michigan Department of Health and Human Services (MDHHS) Comprehensive Quality Strategy (CQS). Responsibilities of the quality management program are outlined in the QAPIP Plan. (42 CFR 438.330(a)(1))

II. SCOPE OF PLAN

The scope of MSHN’s QAPIP includes services and programs provided by the CMHSP participants, substance use disorder providers and their respective provider networks including Certified Community Behavioral Health Clinics, Behavioral Health Home, and Opioid Health Home.

The performance monitoring through the QAPIP, covers all important organizational functions, aspects of care, and service delivery systems. Performance monitoring is accomplished through a combination of well-organized and documented retained, contracted, and delegated activities. Where performance monitoring activities are contracted or delegated, MSHN assures monitoring of reliability and compliance.

III. PHILOSOPHICAL FRAMEWORK

MSHN utilizes the Continuous Quality Improvement (CQI) model of Shewhart, Deming and Juran. The key principles of the CQI model, as recently updated by Richard C. Hermann ("Developing a Quality Management System for Behavioral Health Care: The Cambridge Health Alliance Experience", November 2002), are:

- Health care is a series of processes in a system leading to outcomes.
- Quality problems can be seen as the result of defects in processes.
- Quality improvement efforts should draw on the knowledge and efforts of individuals involved in these processes, working in teams.
- Quality improvement work is grounded in measurement, statistical analysis, and scientific methods.
- The focus of improvement efforts should be on the needs of the customer; and
- Improvement should concentrate on the highest priority problems.

MSHN employs the Plan-Do- Study-Act (PDSA) cycle, attributed to Walter Shewhart and promulgated by Dr. W. Edwards Deming, to guide its performance improvement tasks (Scholtes P. R., 1991).

Performance measurement is a critical component of the PDSA cycle. Measures widely used by MSHN for the ongoing evaluation of processes, and to identify how the region can improve the safety and quality of its operations, are as follows:

- A variety of qualitative and quantitative methods are used to collect data about performance.
 - Well-established measures supported by national or statewide databases are used where feasible and appropriate to benchmark desired performance levels; if external data is not available, then local benchmarks are established.
- Statistically reliable and valid sampling, data collection and data analysis principles are followed as much as possible; and
- If the nature of the data being collected for a measure limits the organization's ability to control variability or subjectivity, the conclusions drawn based upon the data are likewise limited.

Data is used for decision making throughout the PIHP and its provider network through monitoring treatment outcomes, ensuring timeliness of processes, optimizing efficiency, maximizing productivity, and utilizing key measures to manage risk, ensure safety, and track achievement of organizational strategies. MSHN's overall philosophy governing its local and regional quality management and performance improvement can be summarized as follows:

- Performance improvement is dynamic, system-wide and integrated.
- The input of a wide-range of stakeholders – board members, advisory councils, consumers, providers, employees, community agencies and other external entities, such as the Michigan Department of Health and Human Services, are critical to success.
- An organizational culture that supports reporting errors and system failures, as the means to improvement, and is important and encouraged.
- Improvements resulting from performance improvement must be communicated throughout the organization and sustained; and
- Leadership must establish priorities, be knowledgeable regarding system risk points, and act based upon sound data.

IV. ORGANIZATIONAL STRUCTURE AND LEADERSHIP

Governance

Board of Directors

The MSHN's Board of Directors set policy related to quality management and approves the overall QAPIP and QAPIP Plan. MSHN's Board of Directors receives quarterly progress reports of the QAPIP through the Balanced Score Card and MSHN Department Reports, which describe the performance improvement projects undertaken, the actions taken, and the results of those actions. Additionally, the Board of Directors receives an Annual Quality Assessment and Performance Improvement Program Report evaluating the effectiveness of the quality management program, which include recommendations for improvement initiatives in the upcoming year. After review and approval of the Annual Quality Assessment and Performance Improvement Program, the QAPIP Plan and Report, inclusive of a list of the Board of Directors' is submitted to the Michigan Department of Health and Human Services (MDHHS) as required by February 28 of the respective year.¹

Structure

Communication Of Process and Outcomes

The MSHN quality structure identifies clear linkages and reporting structures. The MSHN Quality Improvement Council (QIC), in coordination with the CMHSP Participants and SUD Providers through regional committees and councils, is responsible for monitoring and reviewing performance measurement activities including identification and monitoring of opportunities for process and outcome improvements. Consumers and stakeholders receive reports on key performance indicators, consumer satisfaction survey results, and performance improvement (PI) projects through the Operations Council, Consumer Advisory Council meetings. Final performance and quality reports are available to the stakeholders and the general public through the MSHN website, as requested. The Board of Directors receives periodic and an annual report on the status of organizational performance.²

Chief Executive Officer

The MSHN's Board of Directors employs the Chief Executive Officer (CEO). The MSHN CEO is the designated senior official with responsibility for the implementation of the QAPIP. The MSHN CEO is committed to the goals of the quality improvement plan and to creating an environment that is conducive to the success of quality improvement efforts, ensuring affiliation involvement, removing barriers to positive outcomes, and monitoring results of the quality improvement program across the PIHP. Additionally, the CEO allocates resources for the quality management program, links the strategic planning and operational functions of the organization with the quality management functions, and assures coordination occurs among members of the Operations Council to maintain quality and consumer safety.

The CEO is responsible for managing contractual relationships with the CMHSP Participants and Substance Use Disorder Providers and for issuing formal communications to the CMHSP Participants/SUD Providers regarding performance that does not meet contractual requirements or thresholds. Similarly, the CEO is responsible for ensuring ongoing monitoring and compliance with its MDHHS contract including provision of quality improvement plans as required.

The CEO has designated the Quality Manager as the chair of the MSHN Quality Improvement Council, and a member of the MDHHS Quality Improvement Council. The Quality Manager under the direction of the Chief Compliance and Quality Officer, and in collaboration with the MSHN Quality Improvement Council is

¹ Contract Schedule A-1(k)(20(a) QAPIP for Specialty PIHPs Section I

² Contract Schedule A—1(K)(2)(a) QAPIPs for Specialty PIHPs, Section I

responsible for the development, review, and evaluation of the Quality Assessment and Performance Improvement Plan.³

Medical Director

The MSHN Medical Director and MSHN Addictions Treatment Medical Director consults with MSHN staff regarding service utilization, eligibility decisions, performance improvement projects and is available to provide additional input as required for the regional QAPIP. The MSHN Medical Director leads the Regional Medicaid Directors Committee, is an ad hoc member of the MSHN Quality Improvement Council, demonstrating an ongoing commitment to quality improvement; participating on committees and work teams as needed, reviewing quality improvement reports, sentinel events, and critical incidents; and assisting in establishing clinical outcomes for the PIHP.

Stakeholders

MSHN and the CMHSP Participants/ SUD Providers strive to involve stakeholders including but not limited to providers, family members, community members, and other service agencies whenever possible and appropriate. Opportunities for stakeholder participation include the PIHP governing body membership; PIHP Quality Improvement Council; PIHP Customer Services Committee; Consumer Advisory activities at the local, regional, and state levels; completion of satisfaction surveys; participation on quality improvement work teams or monitoring committees; and focus group participation. Stakeholder input will be utilized in the planning, program development, and evaluation of services, policy development, and improvement in service delivery processes.

Recipients

MSHN continues the legacy of its founding CMHSP Participants by promoting and encouraging active consumer involvement and participation within the PIHP, the respective CMHSPs and their local communities. Recipients of services participate in the QAPIP through involvement in workgroups, process improvement teams, advisory boards, and Quality Improvement (QI) Councils at the local and regional level. Recipients provide input into policy and program development, performance indicator monitoring, affiliation activities/direction, self-determination efforts, QI projects, satisfaction findings, consumer advocacy, local access and service delivery, and consumer/family education, etc. In addition to the participation of recipients of services in quality improvement activities,

Provider Network

The structure of the QAPIP allows each contracted behavioral health network provider to establish and maintain its own unique arrangement for monitoring, evaluating, and improving quality. MSHN will provide oversight and monitoring of providers of its contracted behavioral health network in compliance with applicable regulatory guidance. For the purposes of the Quality Management functions germane to successful PIHP operations, the following core elements shall be delegated to the Community Mental Health Services Programs and SUD Providers within the region:

- Implementation of Compliance Monitoring activities as outlined in the MSHN Corporate Compliance Plan
- Develop and Implementation of Quality Improvement Program in accordance with PIHP Quality Assessment and Performance Improvement Plan
- Staff Oversight and Education
- Conducting Research (if applicable)

³ Contract Schedule A—1(K)(2)(a)QAPIPs for Specialty PIHPs, Section III

MSHN will retain responsibility for developing, maintaining, and evaluating an annual QAPIP plan and report in collaboration with its CMHSP Participants and Substance Use Disorder Providers. MSHN will comply with 42 CFR Program Integrity Requirements, including designating a PIHP Compliance Officer. Assurances for uniformity and reciprocity are as established in MSHN provider network policies and procedures.

The MSHN Provider Network staff have the opportunity to participate in and to support the QAPIP through the following activities:

- Participating in valid and reliable data collection related to performance measures/indicators at the organizational or provider level.
- Identifying organization-wide opportunities for improvement.
- Providing stakeholder feedback through surveys.
- Participation on organization-wide standing councils, committees, work groups.
- Reporting clinical care errors, informing consumers of risks, and making suggestions to improve the safety of consumers.
- Communication between the PIHP QIC and their local organization.

MSHN will provide guidance on standards, requirements, and regulations from the MDHHS, the External Quality Review, the Balanced Budget Act, and/or other authority that directly or indirectly affects MSHN PIHP operations. Communication related to standards and requirements will occur through policy and procedure development, constant contact, training, committees/councils, and the MSHN website. MSHN Councils and Committees are responsible for providing recommendations and reviewing regional policy regarding related managed care operational decisions.

Regional Committees and Councils

Each council/committee develops and annually reviews and approves a charter that identifies the following: Purpose, Decision Making Context and Scope, Defined Goals, Monitoring, Reporting and Accountability, Membership, Roles and Responsibilities Meeting Frequency, Member Conduct and Rules, and Upcoming Goals supporting the MSHN Strategic Plan. Among other duties, these councils/committees identify, receive, and respond on a regular basis to opportunities and recommendations for system improvements arising from the MSHN Quality Assessment and Performance Improvement Program and report annually on the progress of accomplishments and goals.

Operations Council (OC)

The OC was established to advise the Pre-paid Inpatient Health Plan's (PIHP) Chief Executive Officer (CEO) concerning the operations of the Entity. Respecting that the needs of individuals served, and communities vary across the region, it will inform, advise, and work with the MSHN CEO to bring local perspectives, local needs, and greater vision to the operations of the Entity so that effective and efficient service delivery systems are in place that are accountable to the entity board, funders and the citizens who make our work possible. The Operations Council approves all council/committee charters. Each council/committee guides the Operations Council, who advises the MSHN CEO. These recommendations are considered by the Operations Council on the basis of obtaining a consensus or simple majority vote of the twelve CMHSPs. Any issues remaining unresolved after Operations Council consideration will be subject to a vote with the minority position being communicated to the MSHN Board. The MSHN CEO retains authority for final decisions or for recommending action to the MSHN Board.

Regional Medical Directors

The Regional Medical Directors Committee, which includes membership of the MSHN Medical Director and the CMHSP participant Medical Directors, provide leadership related to clinical service quality and service utilization standards and trends. The RMDC was established to advise the MSHN Chief Medical Officer (CMO), the MSHN Chief Executive Officer (or designee), the MSHN Chief Behavioral Health Officer (CBHO), and the

OC concerning the behavioral health operations of MSHN and the region. Respecting that the needs of individuals served, and communities vary across the region, it will inform, advise, and work with the CMO, CEO (or designee), CBHO, and OC to bring local perspectives, local needs, and greater vision to the operations of MSHN so that effective and efficient service delivery systems are in place that represent best practice and result in good outcomes for the people served in the region.

SUD Oversight Policy Board

Pursuant to section 287 95) of Public Act 500 of 2012, MSHN established a Substance Use Disorder Oversight Policy Board (OPB) through a contractual agreement with and membership appointed by each of the twenty-one counties served. The SUD-OPB is responsible to approve an annual budget inclusive of local funds for treatment and prevention of substance use disorders; and serves to advise the MSHN Board on other areas of SUD strategic priority, local community needs, and performance improvement opportunities.

Quality Improvement Council

The MSHN Quality Improvement Council, under the direction of the Operations Council, is responsible for ensuring the effectiveness of the QAPIP. A quality representative from each CMHSP is appointed by the CMHSP CEO to participate in the MSHN Quality Improvement Council. Primary and/or secondary consumer representatives are appointed through an application process. Substance Use Disorder (SUD) Treatment Providers are represented on the Council by MSHN SUD Staff on an as needed basis. Process improvements will be assigned under the auspices of MSHN to an active PIHP council, committee, workgroup, or task specific Process Improvement Team.

Finance Council (FC)

The FC will make recommendations to the Mid-State Health Network (MSHN) Chief Finance Officer (CFO), Chief Executive Officer (CEO) and the Operations Council (OC) to establish all funding formulas not otherwise determined by law, allocation methods, and the Entity's budgets. The FC may advise and make recommendations on contracts for personnel, facility leases, audit services, retained functions, and software. The Finance Council may advise and make recommendations on policy, procedure, and provider network performance. The Council will also regularly study the practices of the Entity to determine economic efficiencies to be considered.

Information Technology Council (ITC)

The ITC was established to advise the Operations Council (OC) and the Chief Executive Officer (CEO) and will be comprised of the Chief Information Officer (CIO) and the CMHSP Participants information technology staff appointed by the respective CMHSP CEO/Executive Director. The IT Council will be chaired by the MSHN CIO.

Clinical Leadership Committee (CLC)

The CLC was established to advise the Prepaid Inpatient Health Plan's (PIHP) Chief Executive Officer (CEO) and the OC concerning the clinical operations of MSHN and the region. Respecting that the needs of individuals served, and communities vary across the region, it will inform, advise, and work with the CEO and OC to bring local perspectives, local needs, and greater vision to the operations of MSHN so that effective and efficient service delivery systems are in place that represent best practice and result in good outcomes for the people served in the region.

Utilization Management Committee (UMC)

The UMC was established to assure effective implementation of the Mid-State Health Network's UM Plan and to support compliance with requirements for MSHN policy, the Michigan Department of Health and Human Services Prepaid Inpatient Health Plan Contract and related Federal & State laws and regulations.

Compliance Committee (CC)

The CC was established to ensure compliance with requirements identified within MSHN policies, procedures, and compliance plan; the Michigan Department of Health and Human Services Prepaid Inpatient Health Plan Contract; and all related Federal and State laws and regulations, inclusive of the Office of Inspector General guidelines and the 42 CFR 438.608.

Customer Services Committee (CSC)

The CSC was established to draft the Consumer Handbook and to develop policies related to the handbook, the Regional Consumer Advisory Council (RCAC), and Customer Services (CS). The Customer Services Committee (CSC) will continue as a standing committee to assure the handbook is maintained in a compliant format, and to support the development and implementation of monitoring strategies to assure regional compliance with CS standards. This committee will be supported by the Director of Quality, Compliance, and Customer Service and will report through the Quality Improvement Council (QIC).

Provider Network Management Committee (PNMC)

PNMC was established to provide counsel and input to Mid-State Health Network (MSHN) staff and the Operations Council (OC) with respect to regional policy development and strategic direction. Counsel and input will typically include: 1) network development and procurement, 2) provider contract management (including oversight), 3) provider qualifications, credentialing, privileging and primary source verification of professional staff, 4) periodic assessment of network capacity, 5) developing inter- and intra-regional reciprocity systems, and 6) regional minimum training requirements for administrative, direct operated, and contracted provider staff. In fulfilling its charge, the PNMC understands that provider network management is a Prepaid Inpatient Health Plan function delegated to Community Mental Health Service Programs (CMHSP) Participants. Provider network management activities pertain to the CMHSP direct operated and contract functions.

SUD-Advisory Councils

The MSHN SUD provider network utilizes work groups to serve in an advisory capacity to MSHN to represent SUD providers and to offer input regarding SUD policies, procedures, strategic planning, quality improvement initiatives, monitoring and oversight processes, and to support MSHN's focus on evidence-based, best practice service and delivery to persons served. Each SUD provider work group is specific to a Level of Care (LOC) and functional area including, Women's Specialty Services, Medication Assisted Treatment, Residential, Recovery Housing, and Outpatient work groups.

Regional Consumer Advisory Council (RCAC)

The RCAC is charged with serving as the primary source of consumer input to the MSHN Board of Directors related to the development and implementation of Medicaid specialty services and supports requirements in the region.

Regional Equity Advisory Committee for Health (REACH)

To address MSHN's strategic priority of better equity, MSHN has established a Regional Equity Advisory Committee for Health (REACH), an advisory body comprised of Region 5 stakeholders and community partners from historically marginalized populations with lived experience. REACH goals are 1) to ensure attention to issues of equity, including reducing health disparities in access and delivery of quality behavioral health and substance use disorder (SUD) prevention, treatment and recovery programs; 2) to inform development and review of MSHN policies, procedures and practices through the lens of diversity, equity and inclusion (DEI); 3) to incorporate a trauma-informed perspective that accounts for historical and racialized trauma; 4) to address stigma and bias that may impact health outcomes.⁴

⁴ Contract Schedule A—1(K)(2)(a) QAPIs for Specialty PIHPs, Section IV

V. PERFORMANCE MANAGEMENT⁵

Performance Management is defined as “a forward-looking process used to set goals and regularly check progress toward achieving those goals. In practice, an organization sets goals, looks at the actual data from its performance measures, and acts on results to improve the performance toward its goals.”⁶ MSHN utilizes a Dashboard and Balanced Score Card (BSC) to provide a comprehensive view of the organizational performance.

a) Establishing Performance Measures

Performance Measures are chosen by MSHN leadership in collaboration with MSHN committees, councils, and work groups based on the needs of the organization, with consideration given to the following three factors:

Focus Area: Clinical, high volume or high-risk services; continuity and coordination of care, or Non-Clinical include but are not limited to appeals, grievance, trends, and patterns of substantiated member rights complaints as well as access to, and availability of services that can be expected to have a beneficial effect on health outcomes and individual satisfaction. Qualitative and quantitative assessment; internal performance.

Impact: The effect on a significant portion of consumers served with potentially significant effect on quality of care, services, or satisfaction.

Compliance: Adherence to law, regulatory, accreditation requirement and/or clinical standards of cares.

Performance measures align with the MDHHS Behavioral Health Quality Programⁱ, and MSHN strategic priorities of Better Health, Better Care, Better Value, Better Provider System, and Better Equity Attachment 2 MDHHS Standardized Performance Measures 2025

The PIHP quality management program uses, but is not limited to, the following means for identification of system issues and opportunities for improvement through performance measurement:

- growth areas identified from key performance indicators
- stakeholder feedback from providers and member experience of care assessments and surveys
- oversight and monitoring reviews from external and internal reviews and processes.

b) Data Collection, Analysis, and Reporting

The purpose of data collection is to monitor performance, identify growth areas, and monitor the effectiveness of interventions. Data must be systematically aggregated and analyzed to become actionable information. Data is used for clinical decision-making, organizational decision-making (e.g., strategic planning and day-to-day operations), and is the basis for identifying performance improvement projects. A description of the measure is written and may include, but is not limited to the following:

⁵ QAPIs for Specialty PIHPs, Section V, Section VI

⁶ (U.S. Department of Health & Human Services, Health Resources & Services Administration. Performance Measurement and Management, 2011)

- Baseline
- Standard/Target/Goal
- Data collection timeframe, and remeasurement periods
- Frequency of data analysis
- Population/sample
- Data source
- Consistent data collection techniques.
- Strategies to minimize inter-rater reliability concerns and maximize data validity.
- Measure Steward

Data is aggregated at a frequency appropriate to the process or activity being studied. Statistical testing and analysis are used as appropriate to analyze and display the aggregated data. PIHP data is analyzed over time to identify patterns and trends and are compared to established performance targets and/or externally derived benchmarks when available. Performance targets are set through established contract requirements and/or externally derived benchmarks. If there is no set performance target, baseline data should be considered prior to setting a target.

Baseline data is data that is collected for a period of time, typically up to one year, prior to establishing a performance target. Historical data, when available may be used for baseline. When collecting baseline data, it is important to establish a well- documented, standardized, and accurate method of collecting the data and set ongoing frequencies to review the data (monthly, quarterly, etc.).

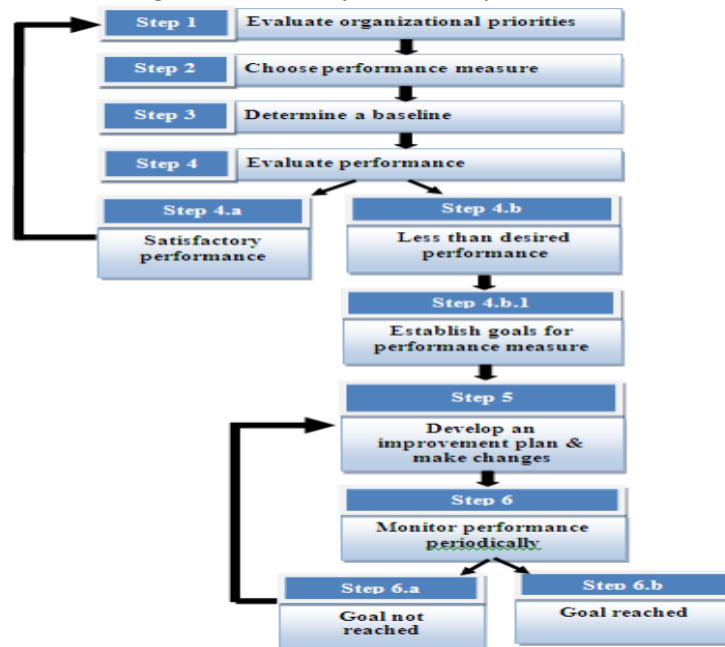
Once the baseline has been collected for a measure, it can be determined if a performance target should be established or not. If the baseline data is at or above the state and national benchmarks when available, and deemed to be within acceptable standards, it is up to the monitoring committee or team to determine if a performance measure should be established or if the measure should continue to be monitored for variances in the baseline data. If the baseline data is below the state and national benchmarks when available, a performance target should be established that is at, or greater than, the state and national average.

Targets may be defined by a set percentage for achievement to meet the outcome being measured or a percentage increase/decrease change to be achieved. When establishing performance targets, the following should be considered (as defined in the Health Resources and Service Administration (HRSA) Quality Tool Kit):

- *Minimum or Acceptable Level:* Performance standards can be considered "minimum" or "acceptable" levels of success.
- *Challenge Level:* This level defines a goal toward which efforts are aimed. Performance results below this level are acceptable because the level is a challenge that is not expected to be achieved right away.
- *Better Than Before:* The performance measurement process is comparative from measurement period to measurement period. Success is defined as performance better than the last period of measurement. This definition comes from the continuous quality improvement (CQI) perspective.

The data is reviewed at the established intervals by the appropriate council, committee, or workgroup, in collaboration with QIC. The data is analyzed for undesirable patterns, trends, or variations in performance. In some instances, it may be necessary to complete further data collection and analysis to isolate the causes of poor performance or excessive variability, proceeding with performance improvement action steps until the performance target is met.

Process Map of Performance Management Pathway (defined by HRSA)



Additionally, if a sampling method is used, the population from which a sample is pulled, and appropriate sampling techniques to achieve a statistically reliable confidence level are included in the project/study description. The default confidence level for MSHN performance measurement activity is a 95% confidence level with a 5% margin of error.

c) Quality Improvement

When the established minimum performance targets or requirements are not met, CMHSP Participants/SUD Providers may need to submit a quality improvement plan that includes the following:

- Goal Statement-What do we hope to achieve
- Causal factors that caused the variance (directly and/or indirectly)
- Interventions with dates of implementation to correct the variance.
- Review of effectiveness of the intervention. Any other actions that will be taken to correct undesirable variation

The plan will be reviewed by the designated MSHN content expert to ensure sufficient action planning. Regional trends are identified and discussed at the relevant committee/council for regional planning efforts and coordination.

In some instances, in lieu of provider level improvement plans, region wide quality improvement efforts may be developed based on the patterns and trends identified through data analysis, Region-wide efforts will follow the process established above and be reviewed for effectiveness at established intervals within the assigned MSHN council, committees, workgroups.

Improvements are achieved by taking action based on data collected and analyzed through performance measurement activities. Actions taken are implemented systematically to ensure any improvements achieved are truly associated with the action. Adhering to the Plan Do Study Act (PDSA) promotes process integrity:

- Plan-Develop a step-by-step action plan, limiting the number of variables impacted.
- Do-Implement the action plan, preferably on a small or pilot scale initially, and

- Study-Analyze the data to check for expected results.
- Act-Modify or develop interventions to obtain expected result.



The PDSA cycle is repeated until the desired level of performance/improvement is achieved. Sustained improvement is sought for a reasonable period (such as one year) before the measure is discontinued. When sustained improvement is achieved, measures move into a maintenance modality, with a periodic (1 year) reassessment of performance to ensure the desired level of quality is being maintained, as appropriate, unless the measure(s) mandated by external entities such as the MDHHS require further measurement and analysis.

VI. PERFORMANCE MEASUREMENT⁷

An effective performance measurement system allows an organization to evaluate the safety, accessibility, quality and appropriateness, effectiveness, clinical outcomes and an evaluation of member experience of the services in which an individual receives. MSHN utilizes a balanced score card to monitor organizational performance. Organizational performance includes but are not limited to MDHHS required metrics. Areas that perform below the standard are included in the annual QAPIP Work Plan.

a) Michigan Mission Based Performance Indicator System (MMBPIS)⁸

The Michigan Department of Health and Human Services (MDHHS), in compliance with Federal mandates, establishes measures in access, efficiency, and outcomes. Pursuant to its contract with MDHHS, MSHN is responsible for ensuring that it's CMHSP Participants and Substance Use Disorder Providers are measuring performance using standardized performance indicators and participate in the MDHHS Behavioral Health Quality Program which includes the Michigan Mission Based Performance Improvement System (MMBPIS).

b) Performance Improvement Projects⁹

MDHHS requires the PIHP to complete a minimum of two performance improvement projects (PIP) per waiver renewal period. The QIC chooses performance improvement projects based on the methodology described

⁷ 42 CFR §438.330(b)(2) 42 CFR §438.330(c).

Contract Schedule A—1(K)(2)(a) QAPIPs for Specialty PIHPs, Section V
Contract Schedule E—Reporting Requirements

⁸ [Quality-Michigan Mission Based Performance Indicator System](#)

⁹ [Quality-Performance Improvement](#)

in Section VI Performance Management of this document which includes but is not limited to the analysis of data, analysis of process, satisfaction, and/or outcome trends that may have an impact on the quality of service provided. Once chosen, a recommendation is made to the MSHN Operations Council for approval. The PIP is presented to relevant committees and councils for collaboration during the duration of the PIP. One of the two is chosen by the department based on Michigan’s Quality Improvement Council recommendations. This project is approved by MDHHS and subject to validation by the external quality review (EQR) organization, requiring the use of the EQR’s form. In alignment with the MDHHS Comprehensive Quality Strategy, MDHHS has elected the focus of the PIP topic for FY22-FY25 to include the reduction of existing racial or ethnic disparities in access to healthcare or health outcomes. Performance is reviewed as outlined in the performance improvement project description to ensure significant improvement is sustained over time. The summary is submitted to the external quality review organization for a validation review, and to MDHHS through the QAPIP Annual Report.

MSHN has approved the following Performance Improvement Projects to address access to services for the historically marginalized groups within the MSHN region.

PIP #1: Study Topic - Improving the rate of new persons who have received a medically necessary ongoing covered service within 14 days of completing a biopsychosocial assessment and reducing or eliminating the racial or ethnic disparities between the black/African American population and the white population.
Study Question - Do the targeted interventions reduce or eliminate the racial or ethnic disparities between the black/African American population and the white population who have received a medically necessary ongoing service within 14 days of completing a biopsychosocial assessment?

PIP #2: Study Topic - The racial or ethnic disparities between the black/African American penetration rate and the index (white) penetration rate will be reduced or eliminated.
Study Questions - Do the targeted interventions reduce or eliminate the racial or ethnic disparities in the penetration rate between the black/African American penetration rate and the index (white) penetration rate?

c) Performance Based Incentive Payment Measures¹⁰

The Performance Bonus Incentive Program has been established to support program initiatives as specified in the MDHHS Medicaid Quality Strategy. Awards will be made to Contractors according to criteria established by the State. Criteria for Performance Bonus awards will include, but is not limited to, assessment of performance in quality of care, access to care and administrative functions. Each year, the State will establish and communicate to the Contractor the criteria and standards to be used for the performance bonus awards.¹¹ Attachment 2. MDHHS Standardized Performance Measures

VII. STAKEHOLDER EXPERIENCE OF CARE ¹²

MSHN values the opinions of consumers, their families, and other stakeholders as essential to identify ways to improve processes and outcomes. Surveys and focus groups are an effective means to obtain input on both qualitative and quantitative experiences. Consumers receiving services funded by the PIHP, and organizations providing services to consumers are surveyed by MSHN at least annually using a standardized survey or

¹⁰ https://www.michigan.gov/mdhhs/-/media/Project/Websites/mdhhs/Keeping-Michigan-Healthy/Mental-Health/Reporting-Requirements/PBIP_FY25.pdf?rev=7e0a3d26492a47b4a9f8d4fe51092527&hash=D02E2D8EFB0BEFF53B3EBB9067EF016F

¹¹ MDHHS PIHP Medicaid Contract FY24 Section 8.D

¹² [Quality-Consumer Satisfaction Survey Policy](#)

assessment tool. The tools vary in accordance with service population needs, address quality, availability, and accessibility of care. Focus groups are conducted as needed to obtain input on specific issues. Consumers may also be queried by the CMHSP participants/SUD providers regarding the degree of satisfaction via periodic reviews of the status of their person-centered plans, as well as during discharge planning for the cessation or transition of services.

Surveys used to assess stakeholder and member experiences include but are not limited to the following:

- Mental Health Statistics Improvement Program (MHSIP)-Adults with a Mental Illness, Substance Use Diagnosis, and/or receiving Long Term Supports and Services (LTSS).
- Youth Satisfaction Survey (YSS)- Youth with a Severe Emotional Disturbance and/or receiving Long Term Supports and Services (LTSS)
- Provider Network Survey-Organizations who contract with MSHN
- Committee/Council Survey-Provider representatives on MSHN committees/ councils
- National Core Indicator Survey-Individuals receiving LTSS

The aggregated results of the surveys and/or assessments are collected, analyzed, and reported by MSHN to the QI Council, Regional Consumer Advisory Council, Substance Use Disorder Providers and other relevant committees/councils. Regional benchmarks and/or national benchmarks are used for comparison when available. The data is used to identify best practices, demonstrate improvements, or identify growth areas. The QI Council outlines systemic actions steps to follow up on the findings. The findings are incorporated into program improvement action plans as appropriate. The CMHSP participants/SUD providers take action on individual cases, as appropriate, identifying and investigating sources of dissatisfaction and determining appropriate follow-up.

An evaluation of the regional activities to improve satisfaction is included in the annual PIHP QAPIP Report and presented to the MSHN governing body, the Operations Council, Regional Consumer Advisory Council, CMHSP Participants, SUD Providers and is accessible on the MSHN website. Findings are shared with stakeholders on a local level through advisory councils, staff/provider meetings and printed materials.¹³

VIII. ADVERSE EVENTS

Adverse Events include any event that is inconsistent with or contrary to the expected outcomes of the organization's functions that warrant a PIHP review. These include MDHHS defined Immediately reportable events, sentinel events, critical incidents, and risk events. A subset of the adverse events will qualify as "reportable events" according to the MDHHS Critical Event Reporting System.

MSHN ensures that the MSHN Provider Network has a system in place to prevent, detect, remediate these events and utilize staff with appropriate credentials for the scope of care, for review and/or follow up within the required timeframes. The following bullets outline the responsibilities of both the MSHN region and the MSHN Provider Network.

- MSHN submits and/or reports required events to MDHHS including events requiring immediate notification as specified in the MDHHS PIHP FY25 contract and the Critical Incident Reporting and Event Notification Policy. Beginning in FY23 the reporting system transitioned to the Behavioral Health (BH) Customer Relationship Management System (CRM) from the MPHI PIHP Warehouse.
- MSHN delegates the responsibility for reporting, reviewing and the follow-up of critical incidents and sentinel events to the MSHN Provider Network.

¹³ Contract Schedule A—1(K)(2)(a)QAPIPs for Specialty PIHPs, Section X(A-D)

- MSHN delegates the responsibility for reporting, reviewing and the follow-up of other events that put people at risk of harm to the CMHSP Participants.
- The MSHN Provider Network is responsible for reviewing critical incidents to determine if the incident is sentinel. A determination of a sentinel event must be made within three days of the discovery of the critical incident, by an appropriately qualified and credentialed staff.
- The MSHN Provider Network is responsible to commence a root cause analysis within 2 business days of the identification of the sentinel event.
- The MSHN Provider Network, based on the root cause analysis/ investigation, will develop and implement either a plan of action to address immediate safety issues, an intervention to prevent further occurrence or recurrence of the adverse event, or documentation of the rationale for not pursuing an intervention. The plan shall address the staff and/or program/committee responsible for implementation and oversight, timelines, and strategies for measuring the effectiveness of the action.¹⁴
- The MSHN Provider Network is responsible to report immediately reportable events (IRE).
- The CMHSP Participants monitor risk events and include actions taken by individuals receiving services as defined by MDHHS, that may cause harm to self or others and have had two or more unscheduled admissions to a medical hospital within 12 months.
- MSHN is responsible for reporting immediately reportable events to MDHHS within 48 hours of notification/discovery of the event.
- MSHN provides oversight and monitoring of the MSHN Provider Network processes for reporting sentinel events, critical events, events requiring immediate notification to MDHHS, and monitoring of risk events. In addition, a quarterly analysis of the events, identified patterns or trends, the completion of identified actions, and recommended prevention strategies for future risk reduction is reviewed with the relevant committees and councils.
 - Risk Events required to be reviewed include the following: Harm to self, harm to others, and two or more unscheduled admissions to a medical hospital (not due to planned surgery or natural course of a chronic illness) within a 12 month period.
 - Critical Events required to be reviewed and reported include the following: suicide deaths, non-suicide deaths, arrests, emergency medical treatment and/or hospitalization for injuries, illness, medication errors, and serious challenging behaviors, 911 calls made by staff for assistance with a behavioral crisis, and physical management for required populations as defined by MDHHS.¹⁵ Additionally, subcategories reported for deaths include accidental/unexpected and homicide. Subcategories for emergency medical treatment and hospitalizations include those injuries from the use of physical management and/or falls.
 - Immediately Reportable Events (IRE) are required to be reported within 48 hours to MDHHS and include the following: any death that occurs as a result of staff action or inaction, subject to a recipient rights, licensing, or police investigation within 48 hours of the death or receipt of the notification of the death and/or investigation to the PIHP.
 - Sentinel Events include but are not limited to incidents that result in the following: Unexpected deaths, permanent harm, severe temporary harm and intervention required to sustain life. (The Joint Commission 2022)

¹⁴ Quality-Sentinel Events

¹⁵ [Quality-Critical Incidents](#)

IX. BEHAVIOR TREATMENT¹⁶

MSHN delegates the responsibility for the collection and evaluation of data, and the evaluation of the effectiveness of the Behavior Treatment Committee by stakeholders to each local CMHSP Behavior Treatment Review Committee. Behavior treatment data is reviewed as part of each CMHSP Quality Program. Only those (restrictive and/or intrusive) techniques that are permitted by the Behavior Treatment Technical Requirements and have been approved during the person-centered planning process may be used with individuals receiving services. Data is collected, reviewed, and reported to MSHN quarterly by the CMHSP where intrusive and restrictive techniques have been approved for use with individuals, and where physical management or 911 calls to law enforcement have been used in an emergency behavioral situation. Data shall include numbers of interventions and the length of time the interventions were used per person. By asking the behavior treatment committees to track this data, it provides important oversight to the protection and safeguard of vulnerable individuals including those receiving long term supports and services.

MSHN provides oversight through analysis of the data on a quarterly basis to address any trends and/or opportunities for quality improvements. MSHN also uses this data during the delegated managed care site reviews to ensure accurate reporting and adherence to the Behavioral Treatment Standards by each CMHSP. MSHN conducts clinical chart reviews for those with recommended restrictive and/or intrusive interventions, in addition to the annual review of BTPRC policy and procedures. The clinical chart reviews address each of the behavior treatment standards and overall compliance is determined based on implementation of those standards. This data is available to MDHHS upon request.¹⁷

X. CLINICAL QUALITY STANDARDS

a) Utilization Management¹⁸

MSHN ensures access to publicly funded behavioral health services in accordance with the Michigan Department of Health and Human Services contracts and relevant Medicaid Provider Manual and Mental Health Code requirements.

MSHN directly or through delegation of function to the CMHSP Participants/SUD Providers acting on its behalf, is responsible for the overall network's utilization management (UM) system. Each CMHSP Participant/SUD Provider is accountable for carrying out delegated UM functions and/or activity relative to the people they serve through directly operated or contracted services.

Initial approval or denial of requested services is delegated to CMHSP Participants/SUD Providers, including the initial screening and authorization of psychiatric inpatient services, partial hospitalization, and initial and ongoing authorization of services for individuals receiving community services. All service authorizations are based on medical necessity decisions that establish the appropriate eligibility relative to the identified services to be delivered.

Communication with individuals regarding UM decisions, including adverse benefit determination notice, right to second opinion, and grievance and appeals will be included in this delegated function.

Utilization review functions are delegated to CMHSP Participants in accordance with MSHN policies, protocols, and standards. This includes local-level prospective, concurrent and retrospective reviews of authorization and utilization decisions and/or activities regarding level of need and level and/or amount of services, consistent with PIHP policy, standards, and protocols. A Regional Utilization Management

¹⁶ Quality-Behavior Treatment Plan Review Committee

¹⁷ Contract Schedule A—1(K)(2)(a)QAPIs for Specialty PIHPs, Section IX

¹⁸ Utilization Management Plan

Committee comprised of each CMHSP Participant assists in the development of standards and reviews/analyzes region-wide utilization activity and trends.

MSHN retains utilization review functions for substance use disorder (SUD) services in accordance with MSHN policies, protocols, and standards. This includes local-level prospective, concurrent, and retrospective reviews of authorization and utilization decisions and/or activities regarding level of need and level and/or amount of services, consistent with PIHP policy, standards, and protocols. Initial service eligibility decisions for SUD services are delegated to SUD providers through the use of screening and assessment tools.

MSHN ensures that screening tools and admission criteria are based on eligibility criteria established in contract and policy and are reliably and uniformly administered. MSHN policies are designed to integrate system review components that include PIHP contract requirements and the CMHSP Participant's/SUD Provider roles and responsibilities concerning utilization management, quality assurance, and improvement issues.

MSHN has established criteria for determining medical necessity, and the information sources and processes that are used to review and approve provision of services. MSHN and its CMHSP Participants/SUD Providers use standardized population-specific assessments or level of care determination tools as required by MDHHS. Assessment and level of care tools guide decision making regarding medical necessity, level of care, and amount, scope, and duration of services. No one assessment shall be used to determine the care an individual receives, rather it is part of a set of assessments, clinical judgment, and individual input that determine level of care relative to the needs of the person served.

MSHN has mechanisms to identify and correct under-and over-utilization of services as well as procedures for conducting prospective, concurrent, and retrospective reviews. MSHN ensures through policy and monitoring of the CMHSP Participants/SUD Providers that qualified health professionals supervise review decisions and any decisions to deny or reduce services are made by health care professionals who have appropriate clinical licensure and expertise in treating the beneficiary's condition. Through policy and monitoring of CMHSP Participants/SUD Providers, MSHN shall ensure that reasons for treatment decisions are clearly documented and available to persons served; information regarding all available appeals processes and assistance through customer services is communicated to the consumer; and notification requirements are adhered to in accordance with the Medicaid Managed Specialty Supports and Services contract with the Michigan Department of Health and Human Services.

b) Integrated Care

MSHN has developed a population health and integrated care plan to establish regional guidance and best practices related to population health and integrated care strategies. Integrated care initiatives are used to improve the health of individuals within the MSHN region. The integrated care initiatives are monitored through population health analysis and a core set of performance measures designed to measure the health outcomes of individuals and the effectiveness of services requirements within various models of care. A continuous quality improvement (CQI) plan is implemented in accordance with each integrated care program requirement. Currently MSHN participates in the following initiatives:

- Certified Behavioral Health Clinics (CCBHC)
- Behavioral Health Homes (BHH)
- Substance Use Disorder Health Homes (SUDHH)
- Complex Care Management

c) Value Based Purchasing

MSHN utilizes a value-based purchasing model in coordination with the CMHSP participants and SUD Providers to provide cost effective, and high-quality care. This is completed through incentivizing positive clinical outcomes utilizing the most effective service model.

d) Practice Guidelines¹⁹

MSHN supports and requires the use of nationally accepted and mutually agreed upon clinical practice guidelines including Evidenced Based Practices (EBP) to ensure the use of research -validated methods for the best possible outcomes for service recipients as well as best value in the purchase of services and supports. Practice guidelines include clinical standards, evidenced-based practices, practice-based evidence, and promising practices that are relevant to the individuals served.

The process for adoption, development, and implementation is based on key concepts of recovery, and resilience, wellness, person centered planning/individual treatment planning and choice, self-determination, and cultural competency. Practices will appropriately match the presenting clinical and/or community needs as well as demographic and diagnostic characteristics of individuals served. Practice guidelines utilized are a locally driven process in collaboration with the MSHN Councils and Committees. Practice guidelines are chosen to meet the needs of persons served in the local community and to ensure that everyone receives the most efficacious services. Clinical programs will ensure the presence of documented practice skills including motivational interviewing, trauma informed and focused care, positive behavioral supports, and appropriate behavior treatment planning principles and processes.

Practice guidelines will be monitored and evaluated through data analysis and MSHN's site review process to ensure CMHSP participants and SUD providers, at a minimum, are incorporating mutually agreed upon practice guidelines within the organization. Additionally, information regarding evidenced based practices are reported through the annual assessment of network adequacy. Fidelity reviews shall be conducted and reviewed as part of the local quality improvement program or as required by MDHHS.²⁰

The use of practice guidelines and the expectation of use are included in provider contracts. Practice guidelines are reviewed and updated annually or as needed and are disseminated to appropriate providers through relevant committees/councils/workgroups. All MDHHS and Regional practice guidelines adopted for use are available on the MSHN website: [Practice Guidelines - Mid-State Health Network](#).

e) Long Term Supports and Services/ Home and Community Based Standards

MSHN ensures that individuals needs are assessed and long term supports and services are included in the individual's plan of service and provided in a manner that considers the health, safety, and welfare of consumers, family, providers, and other stakeholders. When health and safety, and/or welfare concerns are identified, those concerns are acknowledged, and actions taken as appropriate. As indicated in the 1115 Waiver, LTSS include the following services: Respite, CLS (Community Living Supports), PDN (Private Duty Nursing), Supported/Integrated Employment, Out of Home Non-Vocational Habilitation, Good and Services, Environmental Modifications, Supports Coordination, Enhanced Pharmacy, PERS (Personal Emergency Response System), Community Transition Services, Enhanced Medical Equipment and Supplies, Family Training, Non-Family training, Specialty Therapies (Music, Art, Message), Children Therapeutic Foster Care, Therapeutic Overnight Camping, Transitional Services, Fiscal Intermediary Services, and Prevocational Services. MSHN assesses the quality and appropriateness of care furnished, assessment of care during the

¹⁹ Service Delivery-Clinical Practice Guidelines and Evidence Based Practices

²⁰ 42 CFR §438.236(b)(1-4). QAPIs for Specialty PIHPs, Section XI. 42 CFR §438.236(c) Contract Schedule A—1(K)(5)(a). Contract Schedule A—1(K)(2)©.42 CFR §438.330(b)(4)(5)(i)

transition between care settings, and community integration through coordinated specialized foster care home visits with CMH staff, documented individual review results in the MSHN EMR, aggregated reports on outcomes of site reviews, individual feedback on member experiences (satisfaction surveys, appeals and grievance data), adverse events (sentinel, critical, and risk), and clinical chart reviews to ensure opportunities for community integration are occurring, and services are being provided as indicated in the individual plan of service. MSHN monitors systemic patterns through population health using data analytics software to identify adverse utilization patterns and to reduce health disparities. ²¹

f) Cultural Competence

MSHN and its Provider Network shall demonstrate an ongoing commitment to linguistic and cultural competence that ensures access and meaningful participation for all people in the service area. Such commitment includes acceptance and respect for the cultural values, beliefs, and practices of the community, as well as the ability to apply an understanding of the relationships of language and culture to the delivery of supports and services.

Competence includes a general awareness of the cultural diversity of the service area including race, culture, religious beliefs, regional influences in addition to the more typical social factors such as gender, gender identification, sexual orientation, marital status, education, employment, and economic factors, etc.

With MSHN's added strategic priority of "better equity," MSHN is seeking to expand its scope of activity beyond cultural competence with an added focus on actively seeking to address implicit bias and to reduce health disparities.

XI. PROVIDER NETWORK OVERSIGHT

a) Provider Qualifications ^{22 23 24}

MSHN has established written policy and procedures, in accordance with MDHHS's Credentialing and Re-Credentialing Policy for ensuring appropriate credentialing and re-credentialing of the provider network. Whether directly implemented, delegated, or contracted, MSHN shall ensure that credentialing activities occur prior to providing services, and minimally every three (3) years thereafter. MSHN written policies and procedures also ensure that non-licensed providers of care or support are qualified to perform their jobs, in accordance with the Michigan PIHP/CMHSP Provider Qualifications per Medicaid Services & HCPCS/CPT Codes chart.

Credentialing, privileging, primary source verification and qualification of staff who are employees of MSHN, or under contract to the PIHP, are the responsibility of MSHN. Credentialing, primary source verification and qualification of CMHSP Participant/SUD Provider staff and their contractors is delegated to the CMHSP Participants/SUD Providers. MSHN monitors the CMHSP Participant and compliance with federal, state, local regulations and requirements through an established process including desk review, site review verification activities and/or other appropriate oversight and compliance enforcement strategies. In addition, MSHN has established an increased monitoring process that focuses on timeliness not decision making and recredentialing as reported bi-annually by the CMHSPs. Any CMHSP that does not meet 90% compliance is subject to increased monitoring.

MSHN policies and procedures are established to address the selection, orientation, and training of directly employed or contracted staff. PIHP employees receive annual reviews of performance and competency.

²¹ QAPIPs for Specialty PIHPs, Section XVI42 CFR §438.330(e)(2)Contract Schedule A—1(K)(3)(a)

²² Provider Network-Provider Network Credentialing/Re-Credentialing

²³ Provider Network-Non-licensed Provider Qualifications

²⁴ Contract Schedule A—1(K)(2)(a)QAPIPs for Specialty PIHPs, Section XII(A-B)

Individual competency issues are addressed through staff development plans. MSHN is responsible for ensuring that each provider, employed and contracted, meets all applicable licensing, scope of practice, contractual, and Medicaid Provider Manual requirements, including relevant work experience and education, and cultural competence. The CMHSP Participants/SUD Providers are likewise responsible for the selection, orientation, training and evaluation of the performance and competency of their own staff and subcontractors.

b) Medicaid Event Verification ²⁵

MSHN has established a written policy and procedure for conducting site reviews to provide monitoring and oversight of the Medicaid and Healthy Michigan funded claims/encounters submitted within the Provider Network. MSHN verifies the delivery of services billed to Medicaid and Healthy Michigan in accordance with federal regulations and the state technical requirement.

Data collected through the Medicaid Event Verification process is aggregated, analyzed, and reported for review. Opportunities for improvements at the local or regional level are identified. The findings from this process, and any follow up needed, are reported annually to MDHHS through the Medicaid Event Verification Service Methodology Report. ²⁶

c) Financial Oversight

MSHN has established written policies and procedures to ensure appropriate financial management. MSHN will conduct a financial oversight review of the SUD provider network. The review will be based on eight standards used to assure regulatory compliance by reviewing the following: Certified Public Accountant (CPA) Audit, compliance with previous corrective action; financial management policies and procedures; documents to ensure proper segregation of duties; evidence to support the Financial Status Report (FSR) billing; verification of board approved sample financial reports; and evaluation of Risk Management Plan. Information obtained from the review will be used to identify focus areas for improvement efforts, in accordance with the oversight monitoring corrective action process.

All CMHSP Participants and MSHN have implemented the generation of a summary of Explanations of Benefits in accordance with the MDHHS Specialty Mental Health Services Program contract. This will provide an additional step to ensure that consumers are aware of service activity billed to their insurance.

d) Provider Monitoring and Follow-Up²⁷²⁸

MSHN uses a standard written contract to define its relationship with CMHSP Participants/SUD Providers that stipulates required compliance with all federal and state requirements, including those defined in the Balance Budget Act (BBA), the Medicaid Provider Manual, and the master contract between the PIHP and MDHHS. Each CMHSP Participant/SUD Provider is contractually required to ensure that all eligible recipients have access to all services required by the master contract between the PIHP and MDHHS, by either direct service provision or the management of a qualified and competent provider panel. Each CMHSP Participant/SUD Provider is also contractually required to maintain written subcontracts with all organizations or practitioners on its provider panel. SUD Providers, however, must first obtain written authorization from MSHN in order to subcontract any portion of their agreement with MSHN. These subcontracts shall require compliance with all standards contained in the BBA, the Medicaid Provider Manual, and the Master Contract between the PIHP and the MDHHS.

Each CMHSP Participant/SUD Provider is required to document annual monitoring of each provider subcontractor as required by the BBA and MDHHS. The monitoring structure shall include provisions for

²⁵ Quality-Medicaid Event Verification

²⁶ Contract Schedule A—1(K)(2)(a). QAPIs for Specialty PIHPs, Section XII(A-B)

²⁷ Quality-CMHSP Participant Monitoring & Oversight

²⁸ Quality-Monitoring & Oversight of SUD Service Providers

requiring corrective action or imposing sanctions, up to and including contract termination if the contractor's performance is inadequate. MSHN continually works to ensure that the MSHN Provider Network supports reciprocity by developing regionally standardized contracts, provider performance protocols, maintain common policies, and evaluate common outcomes to avoid duplication of efforts and reduce the burden on shared contractors. MSHN monitors compliance with federal and state regulations annually through a process that includes any combination of desk review, site review verification activities, and/or other appropriate oversight and compliance enforcement strategies. CMHSPs Participants/SUD Providers that are unable to demonstrate acceptable performance may be required to provide corrective action, may be subject to additional PIHP oversight and interventions, and may be subject to sanctions imposed by MSHN, up to and including contract termination.²⁹

e) External Reviews³⁰

The PIHP is subject to external reviews through MDHHS and/or an external quality reviewer contracted by MDHHS to ensure quality and compliance with all regulatory requirements. MSHN collaborates with MDHHS and the external quality reviewer to provide relevant evidence to support compliance. In accordance with the MDHHS-PIHP, all findings that require improvement based on the results of the external reviews are incorporated into the QAPIP Priorities for the following year and submitted to MDHHS annually by February 28. An action plan will be completed that includes the following elements: improvement goals, objectives, activities, timelines, and measures of effectiveness in response to the findings.³¹

XII. ANNUAL REVIEW of EFFECTIVENESS³²

The MSHN Quality Assessment and Performance Improvement Program (QAPIP) is reviewed annually for effectiveness. The evaluation includes

- The performance on the measures on which it is required to report.
- The outcomes and trended results of each PIP.
- The results of any efforts to support community integration for members using LTSS.
- The annual effectiveness review must include analysis of whether there have been improvements in the quality of health care and services for members as a result of QAPI activities and interventions carried out by the PIHP.
- The analysis should take into consideration trends in service delivery and health outcomes over time and include monitoring progress on performance goals and objectives.

XIII. QAPIP PRIORITIES FY2025

The QAPIP priorities shall guide quality efforts for FY25. The QAPIP Priorities include improvement areas based on the QAPIP review of effectiveness which include key performance indicators that have not met the standard, findings from the External Quality Reviews, findings from the Federal Compliance Review, and recommendations from the annual compliance review for delegated functions. QAPIP activities are aligned with the MSHN Strategic Plan contributing to Better Health, Better Care, Better Provider Systems, and Better Equity for the individuals we serve.

²⁹ QAPIPs for Specialty PIHPs, Section XV

³⁰ Quality-External Quality Review

³¹ Contract Schedule A-K.2.b

³² 42 CFR §438.330(e)(2). Contract Schedule A—1(K)(3)(a)

Attachment 1 provides the QAPIP Priorities and Quality Work Plan for FY25.

Attachment 2 MSHN Governing Board

XIV. DEFINITIONS/ACRONYMS

BTPRC: Behavior Treatment Plan Review Committee reviews, approves, or disapproves any plans that propose to use restrictive or intrusive intervention, with as defined in the Technical Requirement for Behavior Treatment Plans.

Behavioral Health: An individual with a mental illness, intellectual developmental disability and/or substance use disorder or children with a serious emotional disturbance.

BHH: Behavioral Health Home

CCBHC: Certified Community Behavioral Health Clinic

CMHSP: CMHSP is a program that contracts with the State to provide comprehensive behavioral health services in specific geographic service areas, regardless of an individual's ability to pay. (Michigan Mental Health Code 330.1100a, 330.1206).

CMHSP Participant: Refers to one of the twelve-member Community Mental Health Services Program (CMHSP) participant in the Mid-State Health Network.

Contractual Provider: Refers to an individual or organization under contract with the MSHN Pre-Paid Inpatient Health Plan (PIHP) providing administrative type services including CMHSP participants who hold retained functions contracts.

Critical Incident: Critical Incidents are defined as the following events: Suicide; Non-suicide death; Arrest of Consumer; Emergency Medical Treatment due to injury or Medication Error: Type of injury will include a subcategory for reporting injuries that resulted from the use of physical management; Hospitalization due to Injury or Medication Error: Hospitalization due to injury related to the use of physical management.

CIRS: Critical Incident Reporting System includes a system for reporting required events to MDHHS. Currently the Behavioral Health Customer Relations Management includes the critical incident reporting system for MDHHS.

Customer: Includes all Medicaid eligible individuals (or their families) located in the defined service area who are receiving or may potentially receive covered services and supports. The following terms may be used within this definition: clients, recipients, enrollees, beneficiaries, consumers, primary consumer, secondary consumer, individuals, persons served, Medicaid Eligible.

Delegation: An agreement between Contractor and an individual, provider, CMHSP or other organization to perform certain functions that otherwise would be the responsibility of Contractor to perform. Contractor oversees and is accountable for any functions or responsibilities that are delegated to other entities whether the functions are provided by Contractor or other entities.

EQR: External Quality Review is conducted quarterly by CMS and MDHHS.

LTSS: Long Term Supports and Services are provided to older adults and people with disabilities who need support because of age; physical, cognitive, developmental, or chronic health conditions; or other functional limitations that restrict their abilities to care for themselves, and who receive care in home-community based settings, or facilities such as nursing homes.(42 CFR §438.208(c)(1)(2)) MDHHS identify the Home and Community Based Services Waiver. MI-Choice as recipients of LTSS.

CQS: Comprehensive Quality Strategy provides a summary of work done to assess and improve the quality of care and services provided and reimbursed by Michigan's Medicaid programs, in accordance with State and Federal laws and regulations. The CQS provides a framework to accomplish its overarching goals of designing and implementing a coordinated and comprehensive system to proactively drive quality across Michigan Medicaid managed care programs.

Limited English Proficiency (LEP): Means being limited in ability or unable to speak, read and/or write the English language well enough to understand and be understood without the aid of an interpreter

MEV: Medicaid Event Verification is a process which verifies services reimbursed by Medicaid.

MMBPIS: Michigan Mission Based Performance Indicator System includes domains for access to care, adequacy and appropriateness of services provide, efficiency (administrative cost vs. service costs), and outcomes (employment, housing inpatient readmission).

MDHHS CQS: Michigan Department of Health and Human Services Comprehensive Quality Strategy

MDHHS: Michigan Department of Health and Services

OHH-Opioid Health Home

PIP: Performance Improvement Projects must be conducted to address clinical and non-clinical services that can be expected to have a beneficial effect on health outcomes.

PIHP: Prepaid Inpatient Health Plan is a managed care organization responsible for administering specialty services for the treatment of mental health, intellectual and developmental disabilities and substance use disorders in accordance with the 42 CFR part 401 et al June 14, 2002, regarding Medicaid managed care, Medicaid regulations, Part 438, MHC 330.1204b.

Provider Network: Refers to a CMHSP Participant and all Behavioral Health Providers that are directly under contract with the MSHN PIHP to provide services and/or supports through direct operations or through the CMHSP subcontractors.

QAPI: Quality Assessment Performance Improvement

QM/QA/QI: Quality Manager/Assurance/Improvement

QAPIP: Quality Assessment and Performance Improvement Program includes standards in accordance with the Guidelines for Internal Quality Assurance Programs as distributed by the Health Care Financing Administration Medicaid Bureau guide to states in July of 1993, the Balanced Budget Act of 1997, Public Law 105-33, and 42 Code of Federal Regulations (CFR)438.358 of 2002.

Research: (as defined by 45 CFR, Part 46.102) means a systematic investigation, including research development, testing and evaluation, designed to develop or contribute to generalizable knowledge. Activities which meet this definition constitute research for purposes of this policy, whether they are conducted or supported under a program which is considered research for other purposes. For example, some demonstration and service programs may include research activities.

Root Cause Analysis (RCA): A root cause analysis (JCAHO) or investigation (per CMS approval and MDHHS contractual requirement) is "a process for identifying the basic or causal factors that underlie variation in performance, including the occurrence or possible occurrence of a sentinel event. A root cause analysis focuses primarily on systems and processes, not individual performance." (JCAHO, 1998)

Sentinel Event (SE): A sentinel event is an "unexpected occurrence" involving death (not due to the natural course of a health condition) or serious physical or psychological injury, or risk thereof. Serious injury specifically

includes permanent loss of limb or function. The phrase “or risk thereof” includes any process variation for which recurrence would carry a significant chance of a serious adverse outcome (JCAHO, 1998). Any injury or death that occurs from the use of any behavior intervention is considered a sentinel event. Include but are not limited to incidents that result in the following: Unexpected deaths, permanent harm, severe temporary harm and intervention required to sustain life. (The Joint Commission 2022)

Stakeholder: A person, group, or organization that has an interest in an organization, including consumer, family members, guardians, staff, community members, and advocates.

Subcontractors: Refers to an individual or organization that is directly under contract with CMHSP and/or SRE to provide services and/or supports.

SUD Providers: Refers to substance use disorder (SUD) providers directly contracted with MSHN to provide SUD treatment and prevention services.

Veteran Navigator (VN): The role of the Veteran Navigator is to listen, support, offer guidance, and help connect Veterans to services they need.

Vulnerable Person: An individual with a functional, mental, physical inability to care for themselves.

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