

Audit Checklist w/ Refs

Audit Name: Wraparound

Chart Review

Ability to Pay Assessment	There is evidence of Ability to Pay Assessment determination. The ATP is current (within 12 months)	MHC 330.1802-330.1812; SCCMHA Provider Manual Procedure 11.03.01 (Ability to Pay)
Advance Notice of Adverse Action	There is evidence of Advance Notice when consumer services are going to be reduced or discontinued. Services are continued for at least 10 days to allow consumer right to appeal and are continued if consumer chooses to appeal.	Medicaid Manual, Mental Health and Substance Abuse; PIHP Review Protocols D.3.7. / MDCH Site Review Report & Plan of Correction 2003
Authorization Requests	Authorizations for consumer needed services are requested prior to services provided. Check to see if services listed in the plan are currently authorized. Check to see that services with authorizations are also listed in the plan.	MDHHS/PIHP contract, section 3.0; SCCMHA Provider Manual, Policy 05.04.01; MDHHS SED Waiver Site Review
Consent to Treatment	There is a copy of the Informed Consent to Treatment in consumer records. (this will be located on the signature page if staff have marked on the form as notifying consumer)	SCCMHA Provider Manual Policy Recipient Rights Consent to Treatment 02.02.08
Consumer Face Sheet	The consumer face sheet or demographics contains current information. Auditor will be looking for current information in the consumer demographic area of the medical record and that items match what is found in other parts of the chart. Such as consumer residential living arrangement, primary care physician, employment status, medical conditions, DD proxy measures, etc.	Medicaid Manual, Mental Health and Substance Abuse, Recordkeeping
Coordination of Benefits	Program ensures coordination of benefits for all persons served. Primary providers are expected to assist individuals served in obtaining and maintaining benefit eligibility, including facilitation of capitated fund applications, associated renewals and spend down/deductible management and ability to pay renewals.	SCCMHA Provider Manual Policy 11.02.01 (COB); SCCMHA Policy 05.06.01 Network Management and Development.
Crisis Service Coordination	There is evidence of crisis service coordination where appropriate.	SCCMHA Provider Participation Agreement Attachment A, section (2), (a) and (b)
Disclosure Documentation	There is documentation of disclosures made from the record as required. Does the chart reflect information being shared with entities such as DHHS, Court System, Schools, Family members other than guardian/parent, etc.	HIPAA , Waiver Site Review Report
Documents Complete	Documents are complete by the appropriate parties (assessments, progress notes, discharge documents).	Provider Medicaid Manual
Documents in File Identify Consumer	All forms placed in consumer records identify consumer with name and medical record number.	PHP Review Protocols 6.2.3./ MDCH Sit Review Report & Plan of Correction 2002.
Face to Face Contacts Follow Plan	The consumer plan notes the frequency of face to face contacts by each service provider. The consumer record has proof of face to face contacts that match what is noted in the consumer plan.	Medicaid Manual, Mental Health and Substance Abuse, Autism Benefit.

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Guardianship Papers	Guardianship papers are in the file and match stated consumer status. Check to see if consumer has a DHHS worker (Ward of the State) as a guardian. If so, a copy of the guardianship documentation should be in the electronic health record.	MDHHS PIHP Review Protocols
Health and Safety Issues Monitored	The record demonstrates that health and safety issues for the specific consumer are being consistently and continually monitored and addressed.	Medicaid Manual, Mental Health and Substance Abuse 3.24 and 13.3
Laboratory Procedures	There is evidence of appropriate laboratory procedures relative to medication management.	MDCH PIHP Review Protocols, G.3.1, G.3.2, G.3.3; Medicaid Manual, Recordkeeping
Medicaid Denial	There is proof that Medicaid benefits were denied for non-Medicaid consumers.	MHC 330.1814
Medication Consent	There is evidence of psychotropic medication consent in the file. The informed consents are updated yearly.	Mental Health Code 330.1719; SCCMHA Provider Manual Policy 02.02.16 and 02.02.08; PIHP Review Protocols G.3.4.
Medication Monitoring	There is evidence of appropriate medication monitoring by the physician in the file (such as documentation of progress, side effects, lab tests, etc.)	Medicaid Manual, Mental Health and Substance Abuse 3.15
Monitoring by Other Providers	There is evidence that the Wraparound Coordinator monitors the implementation of the plan by other providers. This can be through the regular meetings with the family.	MDCH/CMH Contract, Attachment 6.5.1.1
Parent Advocate Identified in the Plan	The role of the parent advocate is identified in the consumer/family plan by amount, duration, frequency. The plan clearly identifies the purpose and expected outcomes for the service. The billings are consistent with the plan.	Medicaid Provider Manual 17.3.N Wraparound Services for Children and Adolescents; SED Waiver Site Review Protocol Report 2009.
Physical Health Care and Nutritional Screening	Providers are completing a Physical Health Care and Nutritional Screening on each consumer at intake and again yearly if the consumer does not have involvement with psychiatrist or nurse	SCCMHA Policy 03.02.01 Healthcare Integration
Primary Healthcare Coordination	There is evidence of primary health care coordination as appropriate (PHCP). Health Care Coordination Notice is completed per SCCMHA Policy and Primary Care Physician is notified of Psychiatric Hospitalizations, change of class of medication, and adverse reactions to medications as well as abnormal laboratory tests.	SCCMHA Provider Participation Agreement Section 3.17; SCCMHA Policy 03.02.01; PIHP Review Protocols E.3. and E.3.1.; Coordinating Agency Site Visit Protocol L.1.; SCCMHA Policy 03.02.01 Health Care Integration; B.B.A. 438.208
Recipient Rights Reporting	There is evidence of rights reporting by staff as appropriate.	SCCMHA Provider Manual Tab 8 - Summary of Abuse and Neglect Reporting Requirements; MHC (P.A 258) MCL 330.1776; SCCMHA Policy 02.02.10 Recipient Rights Reporting Unusual or Unexpected Incidents
Staff Visitation to Schools/Coordination with Schools	Staff routinely visit schools to gather information about how the child is doing in the school environment as well as in the home.	NO REFERENCE IN SYSTEM
Strength and Cultural Discovery	A Strengths, Needs and Cultural Discovery is completed for each member of the family, and for the family as a whole.	SED Waiver Site Review, Wraparound fidelity to the model.

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Strength and Cultural Discovery as Part of the Plan	Results of the Strengths, Needs and Cultural Discovery are incorporated into the Plan of Service. The plan should include planned interventions and strategies and incorporate individual and family strengths and culture.	SED Waiver Site Review, Wraparound Fidelity to the Model.
Strength and Cultural Discovery Life Domains	The Strengths Needs and Cultural Discovery is holistic and crosses life domain areas. The documentation should address skills, abilities, values, traditions, interests, preferences and all life domains. A needs assessment across life domain areas is completed as part of this process. Needs are prioritized by the family and the chart clearly identifies the family priorities. The team has developed an action plan that identifies alternative strategies to meet identified needs and these are noted in the plan.	SED Waiver Site Review, Wraparound Fidelity to the Model.
<u>Consumers</u>		
Consumer Eligibility	Consumers served meet eligibility criteria for service area, including primary and secondary diagnoses and co-occurring disorders, symptomology, and level of care/acuity of need criteria (includes residency, hospital history, DX, CAFAS) (SED Waiver consumers CAFAS of 90 or greater is needed for children age 12 or younger or 120 or greater for children age 13 to 18).	DHHS/PIHP Contract; SCCMHA Policy 03.01.01; MDHHS SED Waiver Site Review
<u>Documentation</u>		
CAFAS/PECFAS	The CAFAS is completed on all eligible children (between the ages of 7 and 17) and PECFAS (age prior to 7) at the time of assessment, quarterly, and at the time of closing.	SCCMHA Provider Manual, Policy 03.01.01 and Policy 05..04.01
Claims/Service Activity Logs	Claims/Service Activity Logs (services provided) match services in the plan. Billings reflect only those services and frequencies of services that are identified in the plan.	Medicaid Manual, Recordkeeping, MDHHS SED Waiver Site Review
Coordination with Other Services	There is appropriate coordination with other team members (PT, OT, Nursing, psychiatrist, supported employment specialists, Housing Resource Staff, Schools, DHHS, Court System, etc.)	SCCMHA Policy and Procedures.
Emergency Procedures	Provider has emergency procedures that are reviewed with new employees and annually and proof that these procedures are followed by staff. The telephone number for poison control center is readily available to staff or consumers. Procedures should include: Bomb Threat, Power Outage, Tornados, Fire, Missing persons, Water Shortage, how to deal with a threat from a consumer, etc. (For residential, there is provision for evacuation and alternate housing if needed for a few hours or if needed for overnight or longer, with a written agreement with hotel/motel.)	SCCMHA Provider Manual, BHRMC Policy, Page 3, Licensing Rules R400.14318 Licensing sm. Group; R400.15318 Licensing lg. Group; R4001438 Licensing Family Home
Family Choice Assurance	Parent is informed of available options and chooses waiver services instead of psychiatric hospitalization; parent is aware of choices between / among qualified service providers.	SED Waiver Site Review Protocols.

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Family Therapy	Therapy for client and family or other persons significant to the client for the purpose of improving the client/family function--not including individual psychotherapy or family planning counseling.	Medicaid Manual, Mental Health and Substance Abuse, Covered Services
Monthly Contacts	The consumer is in need of, and receives, at least one SED waiver service per month.	SED Waiver Site Review Protocol
Privacy Notices	Consumer and/or parent/guardian were given privacy notices at intake and/or orientation.	HIPAA
Proof of Evidence Based Practices	Provider delivers evidence based practices and provider has proof of staff training in evidence based practices.	SCCMHA Evidence Based Practices Policy
Supervisory Review of Wraparound Team	Wraparound Supervisor will provide individualized clinical supervision and coaching to the Wraparound staff weekly based on their individual needs and experience, and maintain a supervision log. Supervision logs will be available at site reviews and re-enrollment.	Medicaid Manual
Wraparound Team	The child, youth, or family chooses who participates on the wraparound team. This is evidenced by plan paperwork, meeting minutes, case file notes. Attendance at the team meetings is documented and evidence is in the consumer chart.	SED Waiver Site Review, Wraparound Fidelity to the Model.
<u>PCP Review</u>		
Community Team	The Community Team reviews the plan and the budget regularly. The Community Team reviews the budget initially, every 6 months and at graduation. Crisis and safety plans are reviewed more frequently as appropriate to the family needs. Auditors will look for signatures and dates on the budget and the plan.	SED Waiver, Wraparound Fidelity to the Model.
Consumer Goals and Objectives	The consumer or family goals and objectives reflect dreams and desires of the consumer and/or family and are written in the consumer's and/or family's own words when possible. Consumer and/or family participates on an ongoing basis in discussions of his/her plans, goals, and status.	PIHP Review Protocols C.2.10.; Medicaid Manual, Mental Health and Substance Abuse, 13.3
Family Mission Statement	A mission statement is developed or articulated for each wraparound team. Evidence should be noted in the consumer plan as well as in the meeting minutes.	SED Waiver Wraparound Fidelity to the Model.
Frequency of Wraparound Plan Review	The frequency of plan review for the individual consumer is specified. Wraparound Coordinators determine on an ongoing basis, if the services specified in the plan have been delivered, and if they are adequate to meet the needs/wants of the consumer. Frequency and Scope (Face to Face and Telephone) of Wraparound Coordinators monitoring activities must reflect the intensity of the Consumers Health and Welfare needs identified in the plan.	Mental Health Code 330.1714; Medicaid Manual, MDHHS SED Waiver Site Review

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Graduation Summary	A graduation summary identifies overall progress on outcomes and transition to other services / supports. The child / youth and his/her family have identifiable connection to the community as part of the graduation summary. The Community Team agreed with or to the graduation plan. Auditor will be looking for a graduation summary and signature of the community team members on the graduation plan.	SED Waiver, Wraparound Fidelity to the Model.
Health and Safety Issues	The plan reflects the identification of and attention to consumer health and safety issues. Including coordination with primary care physician.	Medicaid Manual; MDHHS SED Waiver Site Review
Level of Care Change	Documentation in chart reflects changes in consumer need and the plan is adjusted to reflect those changes in needs and/or conditions.	SCCMHA Provider Manual, Service selection guidelines; MDHHS SED Waiver Site Review
Natural Supports in Wraparound Plan	The wraparound plan contains strategies for interventions that pertain to natural supports and other community resources in addition to billable services. People that support the child and family across various areas of their lives are identified such as family, friends, neighbors, professionals, school personnel, etc. Along with names the plan should show who these persons are in relation to the family.	SED Waiver, Wraparound Fidelity to the Model.
Outcomes are Measurable	Outcomes are measurable and method of measurement is identified for each outcome. Auditor will be looking for how the family agreed to measure the outcomes in the plan as well as proof of measurement.	SED Waiver, Wraparound Fidelity to the Model.
Outcomes are Monitored	Outcomes are monitored and evaluated at least monthly by the Child and Family TEam and by the Community Team at least every 6 months. Auditor will be looking for team meeting minutes, and Community Team 6 month review format.	SED Waiver, Wraparound Fidelity to the Model.
Plan Scope	Type, amount, durations, scope, duration, and frequency of services are supported by the plan. (What services, how often, and how long).	Medicaid Manual; MDHHS SED Waiver Site Review; SCCMHA Provider Manual; Consumerism Best Practice Guideline
Services Requiring Physician Prescription	Services requiring physician signed prescription follow Medicaid Provider Manual requirements. (Evidence: Physician-signed prescriptions for OT, PT, and Private Duty Nursing (PDN) services are in the file and include a date, diagnosis, specific service or item description, start date and the amount or length of time the service is needed).	Medicaid Manual, MDHHS SED Waiver Site Review
Signatures	Appropriate signatures and titles are evident on file documents. (Consumer/guardian, SC/CM/Therapist and supervisor signed plan. Supervisor signed assessment.)	Medicaid Manual, General Information for Providers, Recordkeeping
Transition Planning	A transition plan is developed and it outlines how the family will continue to get their needs met after the child / youth is off the SED waiver.	SED Waiver, Wraparound Fidelity to the Model.

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Updates to Plan and Budget	The Plan and budget are updated to reflect new interventions and services. Flexible funds are used as a last resort and community outreach is done to meet some needs of the child and family. Auditor will review progress notes, meeting minutes, plan, budget, and Community Team authorization of the budget (should occur at least annually).	MDHHS SED Waiver Site Review; Wraparound Fidelity to the Model.
Wraparound Crisis / Safety Plan	Worries, concerns and potential crisis / safety areas are identified and planned. The plan identifies both proactive and reactive steps or interventions. The interventions are culturally relevant and strength-based. All team members have a defined role in implementing the crisis / safety plan. Auditor will look for evidence on the crisis / safety plan document.	SED Waiver, Wraparound Fidelity to the Model.
<u>Policies and Procedures</u>		
Code of Conduct	Provider has a code of conduct for staff. This code of conduct includes standards of work conduct regarding being under the influence of illegal drugs or alcohol.	MDHHS(previously MDCH) App for Participation page 42; 2.10 ; SCCMHA Policy 05.06.03 Competency Requirements for the SCCMHA Provider Network.
Competency Policy: Orientation Training	Provider has human resource procedures that address SCCMHA competencies for Orientation/training.	SCCMHA Provider Manual, Competency Requirements for the SCCMHA Provider Network 05.06.03; SCCMHA Provider Manual Residential Services Policy 03.02.07
Competency Policy: Performance Monitoring	Provider has human resource procedures that address SCCMHA competencies for Performance Monitoring (evaluations). Provider will conduct routine performance evaluations on an annual basis at minimum.	Medicaid Manual, Admin Record Keeping; SCCMHA Provider Manual Competency Requirements for the SCCMHA Provider Network 05.06.03
Pre Hire Screening	Provider completes a pre hire screening which includes, background check, driving record check, recipient rights check, reference checks, and any health screening that is required prior employment. Provider also includes a pre-employment declaration regarding being under the influence of illegal drugs or alcohol.	SCCMHA Provider Manual, Competency Requirements for the SCCMHA Provider Network 05.06.03
<u>Pre-Audit Review</u>		
Audit Findings--previous year	Auditor will review audit findings from past year and make sure these areas are reviewed during current audit review.	SCCMHA Provider Manual, Policy 05.06.01
Training Records	Minimum training standard for service type is met based upon SCCMHA Training Grid (Review Training Grid Report from DB)	SCCMHA Provider Manual, Competency Requirements for the SCCMHA Provider Network 05.06.03
<u>Staff File Review</u>		
CAFAS or PECFAS Training	All staff have training in CAFAS if dealing with children age 7-17 or PECFAS if dealing with children younger. Training to be renewed every 2 years.	SCCMHA Provider Manual, Policy 03.01.01 and Policy 05..04.01
Children's Diagnostic and Treatment Services Certification	Each staff person has the minimum of 24 hours of training in Childrens Services to meet the Childrens Diagnostic criteria.	MDCH Childrens Diagnostic and Treatment Services Certification Interpretive Guidelines; SCCMHA Provider Manual Tab 3

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DHS Central Registry Checks	All persons working with children of SCCMHA services will have a background check that includes DHS Central Registry for any substantiated abuse or neglect charges against children.	SCCMHA policy 05.06.03 Competency Requirements for the SCCMHA Provider Network.
Initial Wraparound Training	Wraparound Coordinators are required to have a Bachelors Degree, and be a Child Mental Health Professional (CMHP) or supervised by a CMHP according the MDHHS Michigan PIHP/CMHSP qualifications. Must complete three day Wraparound training completed within 90 days of hire.	MDHHS Michigan PIHP/CMHSP Provider Qualifications Per Medicaid Services & HCPCS/CPT Codes; MDHHS SED Waiver Site Review
Job Descriptions on file	Job Descriptions are on file	SCCMHA Provider Manual Policy 05.06.03 Competency Requirements for the SCCMHA Provider Network.
Ongoing Credential Checks	Provider will complete monthly sanction checks, which include minimally SAM, LEIE, MI MDHHS, OIG. Provider will also monitor staff licenses for currency and to assure proper license for services provided.	Medicaid Manual; MDHHS SED Waiver Site Review; PIHP Contract
Ongoing Wraparound Training	Wraparound Coordinators are required to complete a minimum of two MDHHS Wraparound trainings per calendar year. Wraparound Coordinators will demonstrate proficiency in facilitating the Wraparound process, as monitored b their supervisor and Community Team.	MDHHS Michigan PIHP/CMHSP Provider Qualifications Per Medicaid Services & HCPCS/CPT Codes; MDHHS SED Waiver Site Review
Training Minimum Standards	Minimum training standard for service type is met based upon SCCMHA Training Grid and is documented in staff file. Looking for 95% compliance overall with training for persons that have been employed over 60 days. (Refer to Pre-Audit review)	Medicaid Manual, General Info. Pg. 3; SCCMHA Provider Manual, Competency Requirements Policy 05.06.03; Specialized Certification Rules for AFC R330.1806(2)(a-b)
Wraparound Supervisor Training	The Supervisor for the wraparound staff meets criteria as a qualified mental health professional and has completed MDHHS required training. Documentation reviewed must reflect MDHHS three-day Wraparound new facilitator training within 90 days of hire, and one additional MDHHS supervisory training in their first year of supervision. Initial training must occur prior to reporting Medicaid encounters, if Supervisor will work directly with families and children. Supervisors must attend two MDHHS Wraparound trainings annually, one of which shall be a Wraparound Supervisor training.	MDHHS Michigan PIHP/CMHSP Provider Qualifications Per Medicaid Services & HCPCS/CPT Codes; MDHHS SED Waiver Site Review
Wraparound Training	Wraparound Facilitators meet QMHP requirements; all staff performing Wraparound services meet MDCH's education and training requirements which includes the required 3 day wraparound training.	Medicaid Provider Manual; SED Waiver Site Review Protocol Report May 2009.