

Audit Checklist w/ Refs

Audit Name: Enhanced Health Services

Chart Review

Assessment Complete	Assessment is complete and documented for other disciplines (OT, PT, Speech, Psychologist, Dietician, Supported Employment Specialist). Assessment justifies the need for services and how these services will assist the consumer in reaching desired goals or outcomes.	SCCMHA Provider Manual: Performance Expectations for Enhanced Health Care Providers #5, #7; Medicaid Ch. III, Section 3.2
Assessment Timely	Assessment/reassessment for other disciplines (PT, OT, Speech, Psychologist, Dietician, Supported Employment Specialist) is timely and meets standards.	SCCMHA Provider Manual: Performance Expectations for Enhanced Health Care Providers #5
Authorized Assessment	When authorized, assures that assessment is completed in a timely manner.	Medicaid Ch. III, section 2.1; SCCMHA Provider Manual: Performance Guidelines for Enhanced Health Care Services #5, #7; Guidelines for Nursing Services
Consultation	The Psychiatrist consults with CM/SC, RN, home providers, and/or other as appropriate.	NO REFERENCE IN SYSTEM
Consumer Employment	If a consumer is employed this information is noted in the consumer demographics in the consumer chart.	MDCH Performance Indicators
Coordination with MD	Nurse supports MD and there is evidence of coordination of physician in service delivery, medication management, etc.	Medicaid Ch. III, section 2.1; SCCMHA Provider Manual Policy 05.01.04; Guidelines for Nursing Services
Coordination with SC/CM	There is evidence of coordination with SC/CM on open cases.	Medicaid Manual, Mental Health and Substance Abuse, Section 2.1; SCCMHA Provider Manual: Performance Guidelines for Enhanced Health Care Providers #4
Documentation of Treatment	There is documentation of treatment provided by other disciplines (PT, OT, Speech, Psychologist, Dietician) and matches the plan frequency for contacts and monitoring.	MDCH PHP Review Protocols Section G.3.6; Medicaid Ch III, Record Keeping
Education for Parent/Guardian	Education is provided to parent/guardian as needed.	MHC (P.A. 258) MCL 330.1711
Individualized Job Search	Employment Specialists make employer contacts aimed at making a good job match based on consumer's preferences (relating to what each person enjoys and their personal goals) and needs (including experience, ability, symptomatology, health, etc.) rather than the job market (i.e., those jobs that are readily available). An individualized job search plan is developed and updated with information from the vocational assessment/profile form and new job/educational experiences.	Supported Employment Fidelity Scale.
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
Labs Completed	Lab work orders are completed according to SCCMHA Medication Review Policy.	SCCMHA policy 03.02.20 Medication Review.
Labs Reviewed	There is evidence that consumer lab results are reviewed in a timely manner and appropriate action is taken when indicated.	Licensing sm. Group Rules R400.14 310 page 12, 16, & 17; Licensing lg. Group Rules R400.15 310 page 12 & 13

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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 Documented	There is notation of client current medications in the file. This list should include both medical and psychotropic medications.	MDCH PHP Review Protocols G.3.4; Medicaid Manual, Mental Health and Substance Abuse, Record Keeping; SCCMHA Provider Manual Policy 02.02.16
Medication Log	Medication log for consumer is maintained, current, and filled out appropriately.	MDCH PHP Review Protocols G.3.3; Medicaid Ch. I, Record Keeping
Medication Reviews	Evaluate and monitor medications, their effects, and the need for continuing or changing the medication regimen.	Medicaid Ch. III, Covered Svcs, Pg 14, SCCMHA Provider Manual, Type A, Pg 4, section 3.15
Medication Reviews Documented	Documentation is complete and thorough.	MDCH PHP Review Protocols section G Medicaid Ch. I, Record Keeping
Medication Reviews Quarterly	Consumers are seen face to face at a minimum of quarterly to evaluate the effectiveness of medications. If consumer is stable psychiatrist can determine if less frequent reviews are warranted.	SCCMHA Provider Manual Policy 02.02.16
Monitoring	Other disciplines (PT, OT, Speech, Psychologist, Dietician, Therapist) conduct monitoring based on scope, intensity and duration as defined in the and plan.	Medicaid Ch. III, 13.3
Occupational Therapy	Application of occupation-oriented or goal-oriented activity to achieve optimum functioning, to prevent dysfunction, and to promote health. SVCS must be prescribed by a physician and may be provided on an individual basis or on a group basis.	Medicaid MH/SA, Covered SVCS, Pg 19
Physical Health	There is evidence of consumer physical health monitoring and assessment when needed and desired by consumer.	SCCMHA Provider Manual Policy 03.02.01; Guidelines for Nursing Services; SCCMHA Provider Manual Type A/Type B Specialized Residential Services Guidelines
Physical Therapy	Activities are provided by a qualified physical therapist/assistant to determine the client's need for services and to recommend a course of treatment--prescribed by a physician.	Medicaid MH/SA, Covered SVCS, Pg 20
Progress Notes Match	The progress notes of other disciplines (PT, OT, Speech, Psychologist, Dietician, therapist, supported employment specialists, etc.) match scope, intensity and duration as defined in plan.	Medicaid Manual, Mental Health and Substance Abuse
Psychiatric Evaluation	Performed face-to-face by a Psychiatrist including presenting problem; history of present illness; previous psychiatric, physical, and medication history; relevant personal and family history; personal strengths and assets; and mental status examination.	Medicaid Ch. III, Covered Svcs, Pg 12
Services Documented	Services are provided appropriately and documented.	Dept of Mental Health Admin Rules pg 6 R330.1053; Medicaid Manual, General Information for Providers; SCCMHA Provider Manual Residential Services Policy 03.02.07; Provider Participation Agreement

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Services Provided to Scope	Services are provided and monitored according to the scope, duration, and intensity identified in the PCP.	MDCH PHP Review Protocols B.9.3.1 and B.14.3.1
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
Supported Employment Documentation	The documentation in the consumer charts by the Supported Employment Specialists is reflective of the phases of employment service, including intake, engagement, assessment, job placement, job coaching, and follow-along supports before step down to less intensive employment support from another mental health practitioner.	Best Practice for Documentation
Supported Employment Specialists are Vocational Generalists	Supported Employment Specialists carries out all phases of employment service, including intake, engagement, assessment, job placement, job coaching, and follow-along supports before step down to less intensive employment support from another mental health practitioner.	Supported Employment Fidelity Scale.
Supported Employment Specialists Services	Supported Employment Specialists staff provide only employment services.	Supported Employment Fidelity Scale.
Treatment Provision	For other disciplines (PT, OT, Speech, Psychologist, Dietician, Therapist, Supported Employment Specialist), the treatment provision matches plan; correct level of intervention/treatment based on how PCP describes.	NO REFERENCE IN SYSTEM
Vitals Checked	Vitals are checked at medication reviews or as indicated in plan of service.	NO REFERENCE IN SYSTEM
Work based Vocational Assessment	An initial vocational assessment occurs over 2-3 sessions and is updated with information from work experiences in competitive jobs. A vocational profile for that includes information about preferences, experiences, skills, current adjustment, strengths, personal contacts, etc., is updated with each new job experience.	Supported Employment Fidelity Scale
<u>Documentation</u>		
Consumer Satisfaction	Consumer satisfaction is sought and action is taken to promote consumer satisfaction.	SCCMHA Provider Manual, Policy 05.06.01 Network Management & Development.
Disposal of consumer PHI	Provider has a provision for disposal of consumer Protected Health Information (PHI) that will render the documents unreadable, indecipherable, and otherwise cannot be reconstructed. Cross Cut shredders are ideal but the shredding should be between 7/16 and 1/32 of an inch.	Health Information Technology for Economic and Clinical Health (HITECH) Act. HIPAA Compliance Policies. SCCMHA Contract.
Documents Current	Documents in the file are current.	NO REFERENCE IN SYSTEM

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Emergency Procedures	<p>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.)</p>	<p>SCCMHA Provider Manual, BHRMC Policy, Page 3, Licensing Rules R400.14318 Licensing sm. Group; R400.15318 Licensing lg. Group; R4001438 Licensing Family Home</p>
Plan of Correction from Last Audit	<p>Provider submitted an acceptable plan of correction from last SCCMHA audit. Site specific provider has a copy of the plan of correction as submitted by corporate provider.</p>	<p>SCCMHA Auditing Procedure.</p>
Program Areas	<p>Consumers are involved in program areas (evaluation, quality, development, operations, and governance). Persons with disabilities are involved in leadership roles that could be regular, ad hoc or even one time role that a consumer or family member plays in the organization such as: 1) serving on the governing or advisory or consumer leadership board or committee, 2) helping to review or assess program quality, 3) facilitating or helping to facilitate program or site meetings of residents/persons served to review policies, obtain their input, etc. such as home/house/site meetings. This could be as little as a few hours per year, or some level of regular hours per month.</p>	<p>MDCH App for Participation page 33; 2.3.4; SCCMHA Provider Manual Policy on Inclusion 02.03.02</p>
Quality Improvement	<p>Provider has specific initiated or given goals/measures.</p>	<p>SCCMHA Provider Manual, Quality Assessment & Performance Improvement, 04.01.01, Page 1; DCH/CMH Contract Section 6.7.1</p>
Repeat Citations	<p>Provider has evidence that previous citations have been corrected from the last annual audit.</p>	<p>SCCMHA Auditing Procedure.</p>
Supported Employment Caseload Size	<p>Supported Employment Specialists have individual employment caseloads. The Maximum caseload for any full-time employment specialist is 20 or fewer consumers.</p>	<p>Supported Employment Fidelity Scale.</p>
Supported Employment Specialist Supervisor	<p>The Supported Employment unit is led by a supported employment team leader. Employment specialists' skills are developed and improved through outcome-based supervision. All five key roles of the employment supervisor are present.</p>	<p>Supported Employment Fidelity Scale.</p>
Supported Employment Specialists Collaborate	<p>The Supported Employment Specialists and Vocational Rehabilitation counselors have frequent contact for the purpose of discussing shared clients and identifying potential referrals.</p>	<p>Supported Employment Fidelity Scale.</p>

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Supported Employment Specialists Team Member Contact	The Supported Employment Specialists actively participate in weekly mental health treatment team meetings (not replaced by administrative meetings) that discuss individual clients and their employment goals with shared decision-making. Employment specialist's office is in close proximity to (or shared with) their mental health treatment team members. Documentation of mental health treatment and employment services is integrated in a single client chart. Employment specialists help the team think about employment for people who haven't yet been referred to supported employment services.	Supported Employment Fidelity Scale.
Supported Employment Vocational Unit	At least 2 full-time employment specialists and a team leader comprise the employment unit. They have weekly client-based group supervision following the supported employment model in which strategies are identified and job leads are shared. They provide coverage for each other's caseload when needed.	Supported Employment Fidelity Scale.
Team Role	Team role is evident.	NO REFERENCE IN SYSTEM
Training Residential and Day Program	Assures that day program/ residential staff are adequately trained on each consumer's plan of service.	SCCMHA Provider Manual: Performance expectations for enhanced health care providers #3
Treatment Plan Development	The Treatment plan is developed based on an assessment which identifies the person responsible for monitoring and the frequency of monitoring.	MDCH Admin Rules pg 81 R330.7199 Rule 7199 (1), SCCMHA Provider Manual: Performance expectations for Enhanced Health Care Providers #3; SCCMHA Policy 03.02.05; MHC (P.A. L58) MCL 330.1712
<u>Facility/Program Observation</u>		
Record Retention	Programs are housing records in a safe, secure location for records that are not currently active or in use. Auditors will be looking at how records are stored at the facility or program. If stored in another location how the provider can assure the documents are safe and secure.	Health Information Technology for Economic and Clinical Health (HITECH) Act. SCCMHA HIPAA Compliance Policies.
Supported Employment Postings	There are displays of written postings (e.g., brochures, bulletin boards, posters) about employment and supported employment services.	Supported Employment Fidelity Scale.
<u>Policies and Procedures</u>		
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

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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>		
Compliance Notices	Do they exist and if so what responses were. (Review Contract file)	SCCMHA Best Practice
Contracts	Provider has current contract with SCCMHA, or is in process of renewing contract. (Review Expirations Report from DB)	SCCMHA Provider Manual, Policy 02.02.06
Data Integrity	Reports pulled from Sentri for Consumer Demographics, Notes missing, Progress notes requiring your signature, unsigned progress notes, notes incomplete, Expired Ability to pay assessments, etc. are 95% compliant.	NO REFERENCE IN SYSTEM
Training for New Employees	Verify that any new employees have been added as a trainee to SCCMHA DB to verify/track required trainings. Review Training Records Report from DB. Provider should make sure SCCMHA training database is up to date. A copy of the current trainings in the SCCMHA database is attached to your audit notice.	SCCMHA Provider Policy Manual
	(deleted because new training database does not allow you to add new employees until they have training)	
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>		
Credentialing of Professionals	Each employer, including SCCMHA, will verify credentials of position applicants, including proper licensure if required. Checks must include information about any sanctions against Medicaid and Medicare which would exclude billing under these payers. SCCMHA and other provider network organizations must retain current proof of credentials and licensure on file, as well as appropriate historical file information for services billed. Credentialing and re-credentialing are conducted and documented for the following health care professionals: Physicians (MDs or DOs), physician assistants, psychologists (licensed, limited license, or temporary license), social workers (licensed master's, licensed bachelor's, limited license, or registered social service technicians), licenses professional counselors, nurse practitioners, registered nurses, or licensed practical nurses, occupational therapists or occupational therapist assistants, physical therapists or physical therapist assistants, speech pathologists.	HSAG Audit Requirements; SCCMHA Policy 05.06.03 Competency Requirements for the SCCMHA Provider Network; SCCMHA Policy 09.04.03.01 Network Providers Background Verification & Credentialing Procedure & Plan

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<p>Credentials Verified</p>	<p>Credentials are verified and match discipline and role assignment.</p>	<p>Medicaid Provider Manual</p>
<p>Provider verifies sanctions for staff employed.</p>	<p>Provider has a method for checking for sanctions that impact the ability to bill Medicaid and/or Medicare. Office of Inspector General Checks (OIG) are completed or some method of checking for sanctions. Provider is able to provide proof of the monthly reviews at the time of the audit.</p>	<p>MSHN credentialing Policy.</p>
<p>Training for Accommodations</p>	<p>Provider has proof of training relating to accommodations (cultural diversity, disability sensitivity, LEP, etc.) Accommodations training needs to include any special trainings needed for consumer accommodations such as lifts, sign language, any Mental Illness, Developmental Disabilities, and Substance Abuse trainings etc. completed.</p>	<p>MDCH PIHP Site Review Report 2004; SCCMHA Provider Manual, Competency Requirements for the SCCMHA Provider Network 05.06.03;</p>
<p>Training Minimum Standards</p>	<p>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)</p>	<p>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)</p>
<p><u>Staff Questions</u></p>		
<p>Availability of Psychiatrist</p>	<p>Psychiatrist or psychiatric coverage is available 24 hours, 7 days a week</p>	<p>NO REFERENCE IN SYSTEM</p>