

Audit Checklist w/ Refs

Audit Name: Clubhouse--PSR

Chart Review

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
Consumer Wellness	The Clubhouse supports and encourages physical wellness. This may include enhanced nutrition, weight loss, exercise, smoking cessation, and promoting wellness throughout the Clubhouse. Wellness opportunities occur both within the Clubhouse and through connects within community resources.	MDHHS Provider Medicaid Manual; SCCMHA Provider Manual 02.03.25 Philosophy of Care
Recovery	Each program has proof of the belief in recovery in their work. Provider can demonstrate in consumer charts this belief. (does not apply to persons with developmental disabilities)	SCCMHA Policy 02.03.05 Recovery
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
Target Population	Clubhouse programs are appropriate for adults with a serious mental illness who wish to participate in a structured community with staff and peers and who desire to work on the goal areas reflected in the Core Psychiatric Rehabilitation Components. The beneficiary must be able to participate in, and benefit from, the activities necessary to support the program and it's members.	MDHHS Medicaid Provider Manual

Documentation

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.
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 Ig. Group; R4001438 Licensing Family Home

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Audit Name: Clubhouse--PSR

Holidays	Members may have access to the Clubhouse programming during times other than the work-ordered day, including evenings, weekends, and holidays (New Year's Eve, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day). Access during these times should be based on the needs of the Clubhouse community an decided by members and staff. Provider has proof of members discussion of which holidays the Clubhouse will be closed.	MDHHS Medicaid Provider Manual
Job Descriptions on site	Job descriptions are available and are on file at provider location.	Provider Manual Policy 05.06.03 Competency Requirements for the SCCMHA Provider Network, Licensing lg. Group Rules R400.15 207; Licensing sm. Group Rules R400.14 207
Non SCCMHA Consumer Person Centered Plans	Provider is responsible to develop Person Centered Plans on consumers that are not consumers of SCCMHA Services.	Medicaid Manual, Mental Health and Substance Abuse Section 5
Periodic Review of Incident Reports	Provider has a process in place to review periodically all incident reports to look for trends, problem areas, for possible solutions or process improvements. Recommendations/actions taken are implemented in a timely manner. The provider evaluates the actions taken to prevent further incidents. This evaluation is used to determine effectiveness of the actions taken. The provider demonstrates a review of the actions at least 2 times per year.	SCCMHA Provider Manual Policy on Competency Requirements
Plan of Correction from Last Audit	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.	SCCMHA Auditing Procedure.
Program Areas	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.	MDCH App for Participation page 33; 2.3.4; SCCMHA Provider Manual Policy on Inclusion 02.03.02
Provision for 24/7	Providers have a provision to be able to reach them somehow. This can be through an answering service or via emergency cell phones etc. With reasonable response time of 1 hour. Substance Abuse providers must have 24/7 access.	RFP; SCCMHA Provider Manual; Licensing Rule 400.14206
Quality Improvement	Provider has specific initiated or given goals/measures.	SCCMHA Provider Manual, Quality Assessment & Performance Improvement, 04.01.01, Page 1; DCH/CMH Contract Section 6.7.1

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Audit Name: Clubhouse--PSR

Repeat Citations	Provider has evidence that previous citations have been corrected from the last annual audit.	SCCMHA Auditing Procedure.
Support Groups Held Outside Work Ordered Day	There is evidence of all Support Group meetings are held outside the work ordered day.	MDCH PHP Review Protocols.
TE Packet	Clubhouse program has evidence that 'X' numbers are engaged in TEP's	The International Standards for Clubhouse Programs
TEP Duration	Placements are "Transitional", ranging from three months to nine months. This allows as many members as possible to gain work experience.	The international Standards for Clubhouse Programs
TEP rate	Members are paid the prevailing wage rate but at least minimum wage, directly by the employer.	The International Standards for Clubhouse Programs
Variety of Paid work is offered	There is a variety of paid work offered beyond janitorial and fast food in the community.	Medicaid Manual, Mental Health and Substance Abuse Section 5
 <u>Facility/Program Observation</u>		
Accessibility	Each setting must be physically accessible to the individuals residing/ attending there so the individuals may function as independently as they wish. Individuals must be able to move around in the setting without physical barriers getting in their way. This is especially true for individuals in wheelchairs or who require walking aids. Furniture must be placed in such a way that individuals can easily move around it, with pathways large enough for a wheelchair, scooter or walker to navigate easily if individuals with these types of mobility aides reside in the setting.	Home and Community Based Services Medicaid Manual Requirements.
Confidentiality of Privacy	Provider demonstrates protection of individual's privacy.	SCCMHA Provider Manual, RR Contract Requirements, RR Policies and Procedures, 06.02.04.00; Licensing Rules 1979 Amendment 400.712 pg 10
Confidentiality of Records	Records or other confidential information are not open for public inspection?	Mental Health Code 330.1748(1); SCCMHA Provider Manual, RR Contract Requirements; RR Policies and Procedures, 06.02.04.00; Licensing Rules 1979 Amendment, 400.712 pg. 10.
Dignity and Respect	Consumers are treated with dignity and respect	Mental Health Code 330.1708(4); SCCMHA Provider Manual, RR Contract Requirements, RR Policies and Procedures, 06.02.06.00; Licensing Sm. Group rules R400.14 303&305; Licensing Lg. Group rules R400.15 303&305
Provider Responsiveness	Provider demonstrates responsiveness to individual client needs (language, physical access accommodations, cultural needs, etc.)	Application for participation MDCH page 50; 3.1.8; Provider Manual Policy on Inclusion 02.03.02
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.

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Site Maintained	The property/fiscal plant/program site is maintained (if applicable). The environment of care is clean, and organized. Auditor did not note any items that were failing, in disrepair, or not maintained properly. The provider has in place a method to assure that someone is monitoring and provider is informed of any repairs necessary. Proof documents available such as preventative maintenance logs and proofs of inspections as necessary.	SCCMHA Provider Manual, Housing Best Practice Guideline, Quality Standards, Page 4; Licensing small Group Rules R400.14 403 Page 24 & R 400. 14 209 Page 10 Licensing large Group Rules R400.15 209 Page 7 & R400.15 403 page 18; SCCMHA Contract Attachment B
 General		
Clubhouse Schedule	The program's structure and schedule identifies when the various program components occur, eg., ordered-day, vocational/educational.	Medicaid Manual, Mental Health and Substance Abuse Section 5
Clubhouse Staffing	Clubhouse has staffing to supervise units within the PSR program. One full time clubhouse manager with minimum of Bachelor's degree. Other non degreed staff must have documented supervision.	Medicaid Manual, Mental Health and Substance Abuse Section 5
Crisis Management	There are crisis management procedures in place. This information should be provided by the SC/CM, behavior specialist, parent, guardian or consumer.	Medicaid Manual, Mental Health and Substance Abuse
Follow Up Services for Work placement	There is communication with consumer and employer, possibly retraining, readjustment to work setting or intervention related to workplace social skills.	NO REFERENCE IN SYSTEM
Health and Safety	There are no behavioral, safety, health issues either for the individual or the clubhouse community that cannot be handled in a low staff to member program.	Medicaid Manual, Mental Health and Substance Abuse Section 5
Informal Setting/Clubhouse Environment	Clubhouse is in a community location off-site of other services or if onsite has an established space that is non permeable to other agency staff and unique identifying features when possible: separate entrance; separate phone line; etc;	Medicaid Manual, Mental Health and Substance Abuse Section 5
Member activity and supports	Members are actively engaged and supported on a regular basis by program staff and member, in activities and tasks the member has chosen.	Medicaid Manual, Mental Health and Substance Abuse Section 5
Member Driven Policies	There is evidence of policies being driven by Clubhouse Members.	Medicaid Manual, Mental Health and Substance Abuse Section 5
Member Records	Clubhouse has current PCP and all supporting assessment on site in member records.	Medicaid Manual, Mental Health and Substance Abuse Section 5
Person Centered Practice	The clubhouse program environment, staff/member interaction and clubhouse case records support person centered practice and principles of recovery.	Medicaid Manual, Mental Health and Substance Abuse Section 5
Program Structuring	Both informal and formal structures exist which member can influence and shape program operations. (Members leading house/unit meetings; participating in internal/external advisory committees; exhibit sense of "ownership"	Medicaid Manual, Mental Health and Substance Abuse Section 5

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Program Support/Maintenance and Development	Staff and members share equally the work of carrying out the units and services of the clubhouse	Medicaid Manual, Mental Health and Substance Abuse Section 5
PSR/Clubhouse Enrollment	Documentation of DCH Medicaid enrollment with Current CMHSP or direct service provider	Medicaid Enrollment Site Review Indicators
Training for Consumers	Job training includes job tasks, job coaching, adjustment to work setting, job independence, vocational endurance, increase production rate workplace social skills, and regular communication with employers.	SCCMHA Provider Manual, SEP Guidelines, MDCH Guidelines for SEP, Page 2, Item D
Training for SEP	Job training includes job tasks, job coaching, adjustment to work setting, job independence, vocational endurance, increase production rate, workplace social skills, and regular communication with employers.	SCCMHA Provider Manual, SEP Guidelines, MDCH Guidelines for SEP, Page 2, Item D
 <u>PCP Review</u>		
PCP Current	The PCP is current, signed, on file, modified when indicated, and used by staff (PCP should be renewed at minimum of 1 time a year--done as needed which means addendums are completed when significant changes occur in consumer life, consumer needs more or less supports, consumer has attained goals).	Department of Mental Health Admin Rules R330.1276; Mental Health Code 330.1712(1); Medicaid Manual, General Information;
 <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
Competency Policy: Staff Pre-hire screening	Provider has human resource procedures that address SCCMHA competencies for staff pre-hire screening. This should include Criminal Background checks prior to hire and every two years after hire and Recipient Rights checks, as well as licensing/credential checks, where applicable.	SCCMHA Provider Manual, Competency Requirements for the SCCMHA Provider Network 05.06.03; SCCMHA Provider Manual Residential Services Policy 03.02.07; Licensing large Group Rules R400.15 208; Licensing small Group Rules R400.14 208
Health and Safety Policy	A Health & Safety policy/procedure is available for the facility. The Policy should include Fire, Tornado, Medical Emergencies, Power Outages, Gas Leaks, Bomb Threat, Missing Person, etc. as well as provisions to ensure routine checks of facility for any potential health and safety hazards.	MDCH App for Participation page 38; 2.7; Licensing sm. Group Rules R400.14205 page 8 and R400.14301 page 10-12

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Human Resources Policy	Staff are credentialed, licensed, and policy is followed for appropriate program type. All roles providing services to consumers will be described in job descriptions, candidates for positions will be qualified against requirements and duties contained in job descriptions.	SCCMHA Provider Manual, 09.04.03.01 Network Providers Background Certification & Credentialing Procedure & Plan: Licensing sm. Group Rules R400.14 203 & 204 page 7; Licensing lg. Group Rules R400.15 203 & 204 page 5
Infection Control Plan	There is an infection control plan in place to address infection control. Policy and Procedure to address infection control issues. If the home has needles in the home the home must have a needle stick protocol as part of their infection control policy.	SCCMHA Provider Manual Policy 06.01.02 Infection Control Policy and Procedure
Policies and Procedures for Accommodations	The provider has proof of related policies/procedures for accommodations. Policies should include how provider routinely identifies and addresses individual and systemic needs. Will ensure access and accommodation of persons with Limited-English proficiency (LEP), ensure system sensitivity and accommodation of diverse ethnic/cultural backgrounds, accommodation of individuals w/communication impairments (including persons who do not use verbal language to communicate or who use alternative forms of communication, ensure persons with visual, hearing or other physical impairments and mobility challenges are accommodated).	MDCH App for Participation page 36, 2.5; SCCMHA Provider Manual, Accommodations Policy 02.01.01
<u>Pre-Audit Review</u>		
Audit Findings Other	There are plans of correction from Contract Compliance. (Review Contract file)	SCCMHA Provider Participation Agreement
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
Clubhouse Accreditation	Verify that there is fidelity to the model of the evidence-based practice of Psychosocial Rehabilitation by ensuring the Clubhouse has acquired and maintained Clubhouse International accreditation.	MDHHS; Provider Medicaid Manual.
Compliance Notices	Do they exist and if so what responses were. (Review Contract file)	SCCMHA Best Practice
Consumer Participation in Audit	A consumer must be involved in at least one audit per category of audits.	SCCMHA Consumerism Policy 02.03.01 and Inclusion Policy 02.03.02
Entrance conference with provider on date of audit.	Sit down with provider to go over how the audit process will take place and what the expectation is of the provider during the visit.	SCCMHA Auditing Procedure
Exit Conference with provider on date of audit.	Talk to provider about what your findings were, highlight good points as well as areas where they can expect citations, and an anticipated date of written report. Also remember to give a copy of the audit questionnaire.	SCCMHA Auditing Procedure
Grievances Addressed	All grievances on file have been addressed--corrective action plan(s) in place. (Contact Recipient Rights/Customer Service Supervisor)	SCCMHA Provider Manual, RR Contract Requirements, RR Policies and Procedures, 06.02.11.00

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PCP Scope	Amount, duration, scope of services are supported by PCP (What services, how often, and how long).	SCCMHA Provider Manual; Consumerism Best Practice Guideline; Medicaid Manual, Mental Health and Substance Abuse 1.6 and 13.3
Recipient Rights Corrective Action	Any Recipient Rights Corrective Action plan was needed and when you go to the site make sure the corrective action plan has been implemented. (Check the current audit file and previous audit file for any ORR site visit information and review for need for plan of correction).	Policy Standard I
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
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>		
Provider Completes Reference Checks	Providers are verifying references as a part of their pre hire screening and there is proof in the staff files.	SCCMHA Provider Manual, Competency Requirements for the SCCMHA Provider Network 05.06.03
Training for Accommodations	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.	MDCH PIHP Site Review Report 2004; SCCMHA Provider Manual, Competency Requirements for the SCCMHA Provider Network 05.06.03;
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)
<u>Staff Questions</u>		
Staff Knowledge, Skills, Experience	Staff has the knowledge and skills to meet the needs and desired outcomes of the clients, including experience in working with persons with mental health needs.	Medicaid Manual, General Information; Licensing sm. Group Rules R400.14 201 & 204 page 6&7; Licensing lg. Group Rules R400.15 201 & 204 page 4&5