

## Audit Checklist w/ Refs

### Audit Name: Skill Building FY2022

Medication Certification	All staff passing consumer medications have been certified 10 times by a staff member that has been certified by a SCCMHA Nurse or the nurse the provider has on staff. Re -Certification will occur every three years. This certification is to assure the provider/home manager is comfortable with staff passing medications. (not all staff must be certified but staff that are passing medications must be certified and at least one staff on shift must be certified).	SCCMHA Policy 03.02.17 Medication Management in Licensed Residential Settings.
Ongoing Background Checks and Sanctions	As required for CMS (Centers for Medicaid and Medicare Services) to reduce fraud and abuse of Medicaid and Medicare funds, sanction checks should be performed against the List of Excluded Individuals/Entities maintained by the Office of Inspector General (OIG/LEIE) and Systems for Award Management (SAM). At minimum, providers are required to complete these checks at least monthly. Providers are required to review the Michigan Provider Sanction List at least monthly. Ongoing criminal background checks ICHAT (Internet Criminal History Access Tool) should be performed every two years. These checks are required for all staff working in the agency, board members, and anyone with a controlling interest in the agency.	SCCMHA Provider Manual, Competency Requirements for the SCCMHA Provider Network 05.06.03; MDHHS Site Review; MSHN Site Review
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
Staff Job Descriptions on file	Job descriptions are on file.	SCCMHA Provider Manual Policy 05.06.03 Competency Requirements for the SCCMHA Provider Network; Licensing sm. Group Rules R400.14 208 page 9; Licensing lg. Group Rules R400.15 208 page 7.
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)
<b><u>Chart Review</u></b>		
Center-based skill building only	Activities for Daily Living (ADL) services increase and/or maintain daily living skills.	Medicaid Manual, Mental Health and Substance Abuse Section 5
Consumer Health	The promotion of consumer health is evident. Provider ensures that any medical concerns or issues are addressed or monitored.	SCCMHA Provider Manual, Policy, 03.02.01; PIHP Review Protocols E.3. and E.3.1.
Medication Administration	Trained Medication passers are identified for each shift, who know the Five Rights of Medication Administration and proper medication passing procedures. Medication Passers should be knowledgeable of where to find prescriptions, why clients are taking medications, and what to do in the event of refusals, etc.	Medicaid Ch. III, Covered Svcs; Licensing sm. Group Rules R400.14 316 & 312 page 21 & 18; Licensing lg. Group Rules R400.15 314 page 14 & 15; SCCMHA Policy 03.02.17 Medication Management in Licensed Residential Settings

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### Audit Name: Skill Building FY2022

Medication Documentation	Medication Administration Records (MAR) are filled out accurately by Staff, including comments for per requested need (PRN) medications, refusals, or other instances of Staff documentation. If there are controlled substances being administered, the facility has a method of keeping track of these medications and are using two staff from different shifts to assist with counting.	Medicaid Ch. III, Covered Svcs; Licensing sm. Group Rules R400.14 316 & 312 page 21 & 18; Licensing lg. Group Rules R400.15 314 page 14 & 15; SCCMHA Policy 03.02.17 Medication Management in Licensed Residential Settings
Medication Storage & Handling	There is evidence that physician-prescribed oral medication, injection, or topical medication treatments are securely stored. Medications are labeled as to what the medication is and when it should be given, with a label from the pharmacy. Topical and Oral medications are separated. Provider does not have expired or compromised medications in with regular medications. Controlled substances are secured under a double-lock system.	Medicaid Ch. III, Covered Svcs; Licensing sm. Group Rules R400.14 316 & 312 page 21 & 18; Licensing lg. Group Rules R400.15 314 page 14 & 15; SCCMHA Policy 03.02.17 Medication Management in Licensed Residential Settings
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
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
Training on Consumer Individual Plan of Services	Qualified staff are trained regarding all aspects of specific consumer's Individual Plan of Service, examples: proper administration of medications, additional physical interventions, transfers, injections, management of feeding tubes, therapeutic positioning, and suctioning, special dietary needs, diabetes, Behavior Treatment Plans, Occupational Therapy Plans, Physical Therapy Plans, Speech Therapy Plans, etc.	MSHN-SCCMHA Contract (Current FY); PIHP-MDHHS Contract (Current FY); CMHSP Staff Training Tool; SCCMHA Provider Manual
<b><u>Documentation</u></b>		
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 lg. Group; R4001438 Licensing Family Home

## Audit Checklist w/ Refs

### Audit Name: Skill Building FY2022

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
Periodic Review of Incident Reports	Provider has a process in place to periodically review 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. Auditor will use specific trends in the home and request documentation that these were reviewed.	SCCMHA Provider Manual Policy on Competency Requirements; SCCMHA Policy 04.01.02 - Incident Reporting and Review
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
Quality Improvement/Program Evaluation	Provider has specific initiated or given goals/measures. Provider has a system to identify problems and a plan of correction in place.	MSHN-SCCMHA Contract (Current FY), PIHP-MDHHS Contract (Current FY), SCCMHA Provider Manual, Quality Assessment & Performance Improvement, 04.01.01
Repeat Citations	Provider has evidence that previous citations have been corrected from the last annual audit.	SCCMHA Auditing Procedure.
Shift Notes/ Progress Notes	Daily documentation is kept and completed on each shift which reflects implementation of consumer plan. Provider completes daily documentation on each shift reflecting consumer participation in their plan.	SCCMHA Prov. Man., Type A & B Specialized Res., Service Plan and Records, Paragraph 2 page 4; Licensing sm. Group Rules R400.14 316 page 21; Licensing lg. Group Rules R400.15 316 page 16

## Audit Checklist w/ Refs

### Audit Name: Skill Building FY2022

**Facility/Program Observation**

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.
Assistance to Consumers	Consumers are offered assistance as requested or indicated.	SCCMHA Provider Manual Policy 02.01.01 Accommodations
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.
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
Supervision	The program offers supervision of consumers in a safe and secure environment.	SCCMHA Provider Manual Residential Services Policy 03.02.07
<b><u>General</u></b>		
Community Based skill building only	Services are designed to obtain employment, teach functional activities of daily living, job skills, and promote community participation.	SCCMHA Provider Manual, SEP Guidelines, SCCMHA Tech. Req for SEP & Skill Building, Page 4

## Audit Checklist w/ Refs

### Audit Name: Skill Building FY2022

Community Resources	The provider has contacts with businesses, churches, human service agencies, civic groups and other community organizations to facilitate the development of employment and community skill building opportunities and placement of individuals in jobs in surrounding county and potentially surrounding areas.	AFP Requirements
Consumer Choice Involvement	Consumers are actively engaged and supported by program staff and members in the activities and tasks that they have chosen.	NO REFERENCE IN SYSTEM
Schedule	A predetermined schedule is set up, typically in group modalities.	Medicaid Ch. III, General Info., Pg 9
Skill Development	The provider will have the skills necessary to develop, implement, monitor and document employment related goals for individual customers.	AFP Requirements
 <b><u>Log Books</u></b>		
Supervision Documented	There is documented evidence that non professionals were appropriately supervised. The evidence can be in staff communication logs, staff meeting minutes, staff performance improvement plans. Evidence of supervision of support staff directly providing services.	MDCH Site Review Report & Plan of correction 2/12/2003. Medicaid Manual, General Info. Pg. 3
 <b><u>PCP Review</u></b>		
IPOS Current	The IPOS is current, signed, on file, modified when indicated, and used by staff (IPOS 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).	MDHHS Mental Health Code 330.1712 (1), Admin Rules R330.1276; Medicaid Manual, General Information; SCCMHA Policy 02.03.03
IPOS Scope	Amount, duration, scope of services are supported by the IPOS (What services, how often, and how long). All authorizations match what is prescribed.	SCCMHA Provider Manual; Medicaid Manual, Mental Health and Substance Abuse 1.6 and 13.3
PCP Consumer Input	Choice/preferences of individuals are sought, noted, and responded to as part of the consumer plan. It is evident the consumer was involved and consumer requests discussed and addressed in the consumer plan.	MDCH App for participation page 174 Individual indicators; DCH/CMH Contract Section 6.8.2.3; SCCMHA Provider Manual Policy on Consumerism 02.03.01 and Policy on Inclusion 02.03.02
 <b><u>Policies and Procedures</u></b>		
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

## Audit Checklist w/ Refs

### Audit Name: Skill Building FY2022

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
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
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
Medication Disposal	There is an appropriate, documented procedure for staff disposal of any and all discontinued or unused out of date medications. This should include documented witness that signs along with person who is disposing of the medications.	Medicaid Ch. III, Covered Svcs; Licensing sm. Group Rules R400.14 316 & 312 page 21 & 18; Licensing lg. Group Rules R400.15 314 page 14 & 15; SCCMHA Policy 03.02.17 Medication Management in Licensed Residential Settings
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
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
Tornado Drills	The facility will have a procedure addressing what to do in case of a tornado. The facility will have at least one tornado drill per month during the months of April through September which is typically tornado season in Michigan. Provider will have proof documentation of occurrence of the drills.	SCCMHA Safety Procedures.

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**Pre-Audit Review**

Audit Entrance conference with provider either on date of audit or prior to the desk audit.	Meet with provider to go over how the audit process will take place and what the expectation is of the provider during the process. Ensure the provider understand deadlines for documentation submissions. Have the provider give contact information for main person to receive requests during the audit process.	SCCMHA Auditing Procedure
Audit Exit Conference with provider on final date of audit.	Meet with the provider to discuss findings, highlighting 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
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
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
Incident Reporting	Incident Reports are completed as needed and a copy is filed at SCCMHA. The incident reports are to be filed within 24-48 hours of the incident. (Contact Recipient Rights/Customer Service Supervisor)	SCCMHA Provider Manual, Type A & B Specialized Residential, Incident Reporting
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 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
<b><u>Staff Questions</u></b>		
Direct Care Wage Increase	Was provider given a direct care wage increase during the year. If so is there proof at the site that staff the increase as noted in the SCCMHA contract.	SCCMHA Contract and Direct Care Wage increases as noted from the State of Michigan.
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