

## **Maternal Infant Health Program CERTIFICATION PROCESS**

### **INTRODUCTION**

Medicaid policy requires MDCH to monitor and certify Maternal Infant Health Program (MIHP) providers to assure that they are operating in compliance with Medicaid policies (*Medicaid Provider Manual*) and procedures (*MIHP Operations Guide*). Certification is the culmination of a comprehensive review process, in which the reviewer assesses compliance with both program and billing requirements.

The certification review is conducted in two parts:

1. The first part is a review of documents submitted by the provider to the reviewer at least 14 calendar days prior to the scheduled onsite review. These documents include the *MIHP Personnel Roster*, staff licenses and registrations, course completion certificates for required trainings, signed confidentiality agreements for staff with access to Protected Health Information, and program protocols.
2. The second part is a two-day onsite visit, during which the reviewer conducts staff and coordinator interviews, inspects the facility, and examines beneficiary charts and billing documentation.

Once the review is completed, the reviewer uses the *MIHP Certification Tool* to report her findings. Each indicator in the *Tool* is given one of the following ratings: *Met*, *Not Met*, *Met with Conditions*, or *Not Applicable*. An explanation is provided for each *Not Met*, *Met with Conditions*, or *Not Applicable* rating.

### **Review Cycle for New Providers**

MDCH grants a new provider a six-month provisional certification upon completion of all application requirements. The initial certification review is conducted six months after the provisional certification is granted. A new provider who receives full certification is reviewed again in twelve months. A new provider who receives conditional certification is reviewed again in six months. A new provider who obtains full certification but who had few infants or discharged few beneficiaries at the time of the review, will have a six month consultation visit so that the consultant can provide guidance in these areas as needed.

### **Review Cycle for Existing Providers**

An existing provider who receives full certification is reviewed again in eighteen months. An existing provider who receives conditional certification is reviewed again in six months.

## **CERTIFICATION STATUS OPTIONS**

Subsequent to a review, the reviewer determines the provider's certification status based on the number of *Not Met* indicators, the number of *Not Met* critical indicators, and the provider's previous certification status. The options and implications of each are described below.

### **Provisional Certification**

All new MIHP agencies are authorized for a six-month provisional certification once they have met all application requirements specified in the *MIHP Application Process*. These requirements include approval of the application, completion of MIHP orientation, and enrollment in the Community Health Automated Medicaid Processing System (CHAMPS).

Approximately three months after authorization has been given to the agency to provide services, the MIHP state consultant makes an onsite visit. This visit is to assure that the agency is implementing the program as designed and to provide technical assistance as needed. At this visit, the consultant inquires as to the agency's outreach activities and progress in recruiting program participants. If indicated, the consultant assists the agency to strengthen recruiting efforts.

All MIHP agencies are required to have at least forty maternal or infant clients at the time of their first review. Exceptions are made for those agencies serving beneficiaries in a very rural geographical location or a targeted population (e.g., Native Americans, migrants, deaf or hard of hearing persons, etc.).

The first certification review is conducted six months after the provisional certification is granted. The outcome of the first review is either full certification or conditional certification.

### **Full Certification**

Full certification is obtained when:

- A complete certification review has been conducted.
- The agency has six or fewer *Not Met* indicators, two or fewer of which are *Not Met* critical indicators.
- The agency has submitted a Corrective Action Plan (CAP) for the *Not Met* indicators and MDCH has approved it. The CAP must be received by MDCH within twenty one calendar days of the official notification of the results of the review and MDCH must respond within 14 calendar days from the date of receipt of the CAP.

### **Conditional Certification**

Conditional certification is obtained when:

- A complete certification review has been conducted.
- The agency has seven or more *Not Met* indicators or three or more *Not Met* critical indicators.
- The agency has submitted a Corrective Action Plan for the *Not Met* indicators and MDCH has approved it. The CAP must be received by MDCH within twenty one calendar days of the official notification of the results of the review and MDCH must respond within fourteen calendar days from the date of receipt of the CAP.

Conditional certification is effective for six months, during which time the agency must correct all *Not Met* indicators. At the exit conference at the end of the site review, the reviewer presents the *Preliminary Findings of Not Met Indicators*. The agency is expected to begin correcting these indicators immediately.

Conditional certification requires a follow-up consultation visit at approximately three months. Depending on the number, complexity and critical nature of the *Not Met* indicators, this visit may be scheduled earlier than three months post review. It is also possible that more than one consultation visit will be made.

Six months after the conditional review, a second review is conducted. The outcome of the second review is either full certification or decertification:

- Full certification for eighteen months is obtained if the agency has six or fewer *Not Met* indicators, two or fewer of which are *Not Met* critical indicators.
- Decertification occurs if the agency has seven or more *Not Met* indicators or three or more *Not Met* critical indicators. Decertification requires the agency to cease MIHP service delivery.

### **Decertification**

When an agency is decertified by MDCH it is revoking their certification to provide or be reimbursed for MIHP services and immediate cease enrolling beneficiaries. A written notice is sent to the agency via certified mail. The certified letter states the following: the date of decertification; the need to stop enrolling beneficiaries in the MIHP; the need to close or transfer the active caseload to another MIHP provider within 14 business days of receipt of the letter; suspension of any future billings for services from the date of decertification on; and notice of removal from the MDCH MIHP provider directory. Termination Protocol is located on the MIHP website. An agency that is decertified may file an appeal via the Medicaid Administrative Tribunal and Appeals Division. The Medicaid Policy Consultant, Medicaid Managed Care and Medicaid Claims are informed when an agency is decertified.

## **Emergency Decertification**

An emergency decertification may be authorized if a complaint investigation or certification review reveals serious action/inaction or a pattern of activity that threatens the health, wellbeing or safety of Maternal Infant and Health Program beneficiaries. Emergency decertification can be invoked in conjunction with the MDCH Office of Inspector General (OIG), which is responsible for investigating alleged Medicaid fraud, waste, and abuse. An agency that is decertified on an emergency basis may file an appeal via the Medicaid Administrative Tribunal and Appeals Division.

When an agency decides to terminate their MIHP, the agency must send a letter to MDCH which: 1) details their intent to follow the MIHP termination protocol; 2) cites a termination date not less than thirty days in advance of the date of notification; and 3) includes the agency's MIHP NPI Medicaid number.

The MIHP agency must follow the steps outlined in the MDCH MIHP termination protocol when discontinuing its program. Within thirty days after the termination date, a communication must be sent to MDCH detailing compliance with the termination protocol.