

FY2020 COMPLIANCE REVIEW TIMELINE

The FY2020 Compliance Review (CR) timeline provides a description of the criteria item(s) and their due dates for the MDHHS Comprehensive Health Care Program. Below are key points for Medicaid Health Plans (MHPs) to remember prior to submitting their CR documentation:

1. Only submit documentation necessary to meet the requirement. MHPs should include the criteria number in the title of each document submitted. Within the documents, the MHP should **highlight** or include a reference to the page numbers where relevant information can be found.
2. All submissions are due by the dates listed in the Compliance Review Timeline. If any of these due dates fall on a weekend or holiday, the submissions are due the next business day.
3. Items marked as “Web review” or “Other source(s)” do not require action by the MHPs. MDHHS will obtain the required information.
4. MHPs who do not submit documentation by the due date will receive an “Incomplete” for the criteria item(s).
5. MHPs must submit all Compliance Review materials by sharing them via the FTP MSA-MCPD site. MHPs who submit documentation through an alternate method or site will not be considered and will receive an “Incomplete” for the criteria item(s). **The only exception is submitting Third Party Recovery Quarterly Reports – those should be sent directly to TPL via FTP.**
6. **Attestations: Attestations are allowed for FY2020. In the future, attestations will only be accepted every other year and in subsequent years the required documentation will need to be submitted. E.g.: if you attest to an item in FY 2020, you may not attest to the item again in FY 2021. If you do, you will receive an Incomplete and must submit a Corrective Action Plan that includes the required submission.**
7. **Criteria Deeming: NCQA Certified MHPs: MHPs who received a pass as part of their certification will not need to submit any documentation for criteria item(s) marked as “NCQA Deemable”.**
8. MHPs will receive an “Incomplete” for any submissions not meeting the requirements stated in the Compliance Review Timeline and the contract. Upon receiving an “Incomplete”, MHPs are required to submit a Corrective Action Plan (CAP). The due date for the CAP will be indicated in the Monthly Compliance Review reports.
 - a. If an acceptable CAP is received by the due date, MDHHS will provide documentation in the Compliance Review Tool and the “Incomplete” remains.
 - b. If a CAP is not received by the due date OR if the CAP received by MDHHS does not meet requirements, the “Incomplete” will be changed to a “Fail” for the particular criteria item. MDHHS will provide the MHP with technical assistance to ensure an acceptable CAP is developed.
 - c. **If a CAP was required the previous year and you received a CAP again this fiscal year for the same criteria, you will receive a score of “Fail”.**

MHPs should contact their MDHHS Contract Manager at least two weeks prior to the submission date with any questions about criteria item(s) in order to allow enough time for appropriate response before the due date.

If you have previously received a score of “Pass” and submit the exact same information the following year, this does not guarantee you will a “Pass” this year.

OCTOBER 15, 2019

PROVIDERS

(2.6) MHP PROVIDER DIRECTORY

Authority: 1.1XIII(F)

*MDHHS will conduct secret shopper calls of a sample of open PCPs listed in the on-line MHP Provider Directory to check for provider availability accuracy as well as contact/address information accuracy. This will be a baseline, follow up calls will occur in February and **June** to the same providers.*

NOVEMBER 15, 2019

MIS

(5.3) QUARTERLY FINANCIALS

Authority: 3.2II(A), Appendix 3

Submit Quarterly Financial Statements and Reports that were submitted to DIFS for **FY2019 Q4: July 1, 2019 through September 30, 2019**

- a) Quarterly Statement
- b) Risk Based Capital
- c) Statement of Actuarial Opinion
- d) FIS 317 – Revenue and Expense Report for HMOs
- e) FIS 320 – HMO Inpatient Discharges & Benefits Payout Report
- f) FIS 321 – Working Capital Calculation
- g) Third Party Collections

(5.5) THIRD PARTY RECOVERY QUARTERLY REPORT

Authority: 1.1XVII(G)(7)

Complete and ***submit*** Third Party Recovery report for **FY2019 Q4 July 1, 2019 through September 30, 2019**.

OIG

(6.1) (6.2) (6.3) (6.4) (6.5) (6.6) PROGRAM INTEGRITY

Authority: 1.1XVIII (G, H)

Complete and ***submit*** Program Integrity form and related reports for Reporting Period of **July 1, 2019 through September 30, 2019**:

- 1) Tips and Grievances
 - 2) Data Mining
 - 3) Audits
 - 4) Provider Dis-enrollments
 - 5) Overpayments Collected
 - 6) EOB Reporting Requirements
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PROVIDERS

(2.1) STANDARD PROVIDER CONTRACT FORMATS

Authority: 1.1XIV(B); V(A)

Complete and **submit** Provider Contract Table *(If MHP passed this criteria in the last compliance review, and the contracts have not changed, an attestation that the contract includes the required content will be acceptable)*

- 1) Are approved by the Department of Insurance and Financial Services (DIFS) with date of approval
- 2) Prohibit the provider from seeking payment from the enrollee and require the provider to look solely to the MHP for compensation for services rendered
- 3) Prohibit provider from denying covered services to enrollee due to enrollee's inability to pay the co-payment
- 4) Require the provider to cooperate with the plans quality improvement and utilization activities
- 5) Include provisions for the immediate transfer of enrollees to another MHP PCP if their health or safety is in jeopardy
- 6) Include provisions that allow the providers to discuss all treatment options with enrollees
- 7) Include provisions that stipulate the provider is not prohibited from advocating on behalf of the enrollee in any grievance or utilization review process, or individual authorization process to obtain necessary health care services
- 8) Ensure continuity of treatment in the event a provider's participation with MHP terminates during the course of a member's treatment by that provider
- 9) Require providers to accept the enrollee and not discriminate
- 10) Provide or arrange for coverage of services 24 hours per day, seven days per week
- 11) PCPs are available to see patients a minimum of 20 hours per practice location per week

(2.2) PROVIDER SUBCONTRACT: HEALTH BENEFIT, ADMINISTRATIVE AND/OR TRANSPORTATION

Authority: STANDARD CONTRACT TERMS 8; 1.1VI (H)

MHP PROVIDES APPROPRIATE NOTIFICATION TO MDHHS AND INCLUDES THE FIRM NAME AND ADDRESS, CONTACT PERSON AND A COMPLETE DESCRIPTION OF WORK TO BE CONTRACTED

Complete and **submit** Subcontract Table, submit Monitoring Documentation and Prior Authorization Policy and Procedure, if applicable, and Policies and Procedures for coverage for Non-Emergency Medical Transportation (NEMT). *(If MHP passed these items in the last compliance review, and the contracts have not changed, an attestation that the contract includes the required content will be acceptable. Any item not passed in the last compliance review must be submitted.)*

- 1) Category I – 30 days prior to the effective date for Health Benefit Managers
- 2) Category II – 21 days prior to the effective date for Administrative Subcontractors, A, B or C
- 3) Category III – 30 days prior to the effective date (for Type A & B)
- 4) Monitoring documentation, for Transportation Subcontract, this must include beneficiary complaint resolution, mileage reimbursement and vehicle inspections
- 5) Prior Authorization policy and procedure for each subcontract, if applicable
 - a) **For dental subcontractor, include data on the percentage of denials for the previous fiscal year**

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- 6) Policies and procedures for the coverage of NEMT, including travel expenses
 - 7) NEMT Annual Evaluation Report including any finding of subcontractor non-compliance and any CAP or measures taken
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(2.3) PHARMACY CONTRACTS

Authority: 1.1VI(D)

Submit Pharmacy Contract and Pharmacy policy and procedures: *(If MHP passed this criteria in the last compliance review, and the contracts have not changed, an attestation that the contract includes the required content will be acceptable)*

- 1) Executed, dated and current contract
 - 2) Have a process to review physician requests to prescribe any medically appropriate drug covered for Medicaid FFS population that is not listed on the MHP's formulary
 - 3) Include over-the-counter products covered by the Medicaid FFS program
 - 4) Specify requirements for the use of generic drugs
 - 5) Policy and procedures
 - 6) Notification of changes in PBM (if any)
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(2.4) AGREEMENTS WITH THE PLAN'S SERVICE AREA TO COORDINATE CARE WITH BHDDA AND LHD. AGREEMENTS WITH ALL CMS CLINICS.

Authority: 1.1V(O), VIII(B)

Complete and **submit** Agreement Tables – BHDDA, LHD, CMS, Community Health Worker (CHW) and Community Based Organizations (CBO) and *Schools (if applicable)*. If no current agreement with CBO, provide narrative. *(If MHP passed this criteria in the last compliance review, and the contracts have not changed, an attestation that the contract includes the required content will be acceptable)*

- 1) Executed, dated and in effect with each entity (ALL)
 - 2) Data Sharing (ALL)
 - 3) Emergency Services (BHDDA)
 - 4) Pharmacy and Laboratory Service coordination (BHDDA)
 - 5) Communication on care coordination (BHDDA, LHD, *Schools (if applicable)*)
 - 6) Reporting Requirements (BHDDA, CBO, LHD)
 - 7) Quality Assurance coordination (BHDDA, CBO, LHD)
 - 8) Member Grievance and Appeal Resolution (BHDDA, LHD)
 - 9) Provider Dispute Resolution (BHDDA, LHD)
 - 10) Transition Planning for Youth (LHD, *Schools (if applicable)*)
 - 11) Communication on the assessment, treatment plan and care coordination (CMS Clinic)
 - 12) Roles/responsibilities and communication on development of care coordination plan (CBO, *Schools (if applicable)*)
 - 13) Payment arrangements (CBO)
 - 14) Coordination with Primary Care Provider (CBO, *Schools (if applicable)*)
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(2.5) MHP ASSURES ACCESS 24 HOURS PER DAY, 7 DAYS PER WEEK WITH A TOLL-FREE TELEPHONE NUMBER FOR MEMBER ASSISTANCE AND PROVIDER AUTHORIZATIONS

Authority: 1.1XIII(B)(5), V(C)

MDHHS will review MHP's website

- 1) A toll-free, 24 hour per day, 7 days per week telephone number to assist enrollees is maintained, document phone number

Submit policy for Provider Authorization, Emergent Provider Authorization, including proof that:

- 2) Members have direct contact with a qualified clinical staff person or network provider, available through a toll-free telephone number at all times (include phone number)
- 3) The MHP responds to providers in one hour or less for emergent treatment or prior authorizations for inpatient admissions (include proof)

(2.7) PROVIDER NETWORK – MHP DEMONSTRATES THAT COVERED SERVICES ARE AVAILABLE AND ACCESSIBLE

Authority: 1.1V(A)(1, 2, 11)

Complete and **submit** Provider Network Table and submit attestation that contracted hospitals and PCPs are available as required in Appendix 14 (Use November **2019** Enrollment).

- 1) MHP has an adequate number of affiliated providers for primary care, specialists (including pediatricians, obstetricians and dental services), hospitals, pharmacies and NEMT
- 2) Contracted hospitals are located within time and distance as outlined in Appendix 14
- 3) Affiliated PCP offices are available within time and distance as outlined in Appendix 14
- 4) Network Pharmacies are available within time and distance as outlined in Appendix 14
- 5) Dental providers are available within time and distance as outlined in Appendix 14

Complete and **submit** Network Access Plan. The Plan must include:

- 6) A description of the Contractor's network, criteria used to select Providers, and the Contractor's process for reviewing, updating, and submitting its Provider Directory consistent with this Contract.
- 7) Geo-access summaries (do not include maps)
- 8) Contractor's process for monitoring and assuring sufficiency of its network, including:
 - a) PCPs not accepting new patients and how the Contractor will work to increase the number and percentage of network PCPs accepting new patients without condition/limitations
 - b) Methods for accessing health care needs of Enrollees and their satisfaction with access to and availability of Covered Services
 - c) Provider ratios, surveys, analysis and other information to demonstrate Contractor's ability to meet network adequacy and time and distance standards
 - d) Availability of telemedicine or telehealth, e-visits, triage lines or screening systems or other technology used to enhance access to care
 - e) Contractor's Rural service area strategies to maximize healthcare network access and availability of enrollees

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- f) Contractor's procedures and time frames for making and authorizing referral and prior authorizations if applicable within and outside its network
- g) Contractor's efforts to ensure that its Provider Network addresses the needs of Enrollees, including but not limited to children and adults, including those with limited English proficiency or illiteracy, diverse cultural ethnic backgrounds, physical or mental disabilities and serious, chronic or complex medical conditions
- h) Contractor's plan for providing continuity of care in the event of new population enrollment, changes in service area, covered benefits, contract termination between the Contractor and any of its participating Providers including major health care groups, Contractor insolvency or other inability to continue operations
- i) How the Contractor will address and improve access and availability in network gaps for Provider specialty exceptions

(2.8) MHP MAINTAINS POLICIES AND/OR PROCEDURES THAT ESTABLISH A REGULAR MEANS OF COMMUNICATING AND PROVIDING INFORMATION TO CONTRACT AND NON-CONTRACTED PROVIDERS

Authority: 1.1V; VII(A); XIV(A); XIV(F)

Submit policy and/or procedures for maintaining communication with providers that: *(If MHP passed these items in the last compliance review, and the contracts have not changed, an attestation that the contract includes the required content will be acceptable. Any item not passed in the last compliance review must be submitted.)*

- 1) Ensures that current Medicaid rates are paid in absence of a contract **(NCQA: DEEMABLE NO SUBMISSION NECESSARY)**
- 2) Provides information regarding the prior authorization process, billing and receiving payment and provider appeals
- 3) Provides education services for the Provider Network, including education regarding Fraud, Waste and Abuse
- 4) Includes Provider Appeals processes
- 5) Includes Enrollee Rights
- 6) Has a process for disseminating updates to policies and procedures
- 7) Ensures Provider Manual and bulletins are provided and serve as a source of information to providers regarding Medicaid covered services, policies and procedures, statutes
- 8) Is available and current on the MHP's website

(2.9) PROVIDER APPEAL PROCESS

Authority: 1.1XIV(F)(5, 6)

Submit Provider Appeal Log (for calendar year **2019**)

MDHHS will review MHP's website:

- 1) Process and timeframe for requesting a peer-to-peer discussion between the treating physician and the decision-making medical professional at the plan
- 2) MHP has a Provider Appeal process in place to resolve provider claim and authorization disputes

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- 3) Provider appeal process includes timeframes for submitting an appeal
 - 4) Provider appeal process includes timeframes for response from MHP
 - 5) MHP has a procedure for arranging rapid dispute resolution and binding arbitration
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(2.15) PHARMACY BENEFIT MANAGER OR ADMINISTRATOR (PBM OR PBA) AGREEMENTS AND FINANCIAL TERMS AND ARRANGEMENTS

Authority: 1.1VI(D)(20)

Submit *PBM or PBA Agreements, payment models and/or financial terms and arrangements (these do not all need to be in the same document). Must meet the following:*

- 1) Demonstrate the PBM/PBA is paid an administrative fee which covers their cost of providing the PBM/PBA services as described in the PBM/PBA contract, as well as margin.
 - 2) Includes payment model for PBM/PBA's administrative fee.
 - 3) Includes all financial terms and arrangements for payment of any kind that apply between the Contractor and PBM/PBA. Must include financial terms and payment arrangements for formulary management, drug-switch programs, educational support, claims processing, pharmacy network fees, data sales fees, and all other fees.
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QUALITY

(4.8) ACCREDITATION

Authority: 1.1XVII(C)

Submit *new or changed certificates, letter or attestation*

- 1) Copy of current accreditation certificate **OR**
 - 2) Copy of accreditation organization letter, stating date(s) of planned accreditation survey, IF certificate is expired or will expire within six months of the due date for this criterion
 - 3) Attestation if MHP plans to become accredited under a different organization within six months of submission due date (July 15) for this criterion (may include letter of intention to become accredited to organization)
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(4.11) COMMUNITY HEALTH WORKER (CHW) POLICY AND PROCEDURE

Authority: 1.1 VIII(B)

Submit *Policy/Program Description for Community Health Worker (CHW) program (III. Population Health Management and VIII Behavioral Health Integration):*

- 1) Must support design and implementation of CHW interventions and ensure CHWs are equipped to serve Enrollees in the community, understand all privacy laws, HIPAA provisions, and all core competencies (such as navigating community resources, outreach, cultural responsiveness, etc.)

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- 2) Must maintain a CHW to Enrollee ratio of:
 - a) One full-time CHW per 10,000 Enrollees not later than January 1, 2020
 - b) One full-time CHW per 7,500 Enrollees not later than July 1, 2020
 - c) One full-time CHW per 5,000 Enrollees not later than September 1, 2020
 - 3) Must provide CHWs to Enrollees who have significant behavioral health issues and complex physical co-morbidities
 - 4) Must establish a reimbursement methodology for outreach, engagement, education and coordination services provided by CHWs for peer support specialists to promote behavioral health integration
 - 5) Examples of CHW services include but are not limited to: 1) Conduct home visits to assess barriers to healthy living and accessing health care; 2) Set up, prepare, accompany, remind and follow-up with members about medical and behavioral health office visits; 3) Advocate for clients with providers; 4) Arrange for social services (such as housing and heating assistance) and surrounding support services; 5) Provide clients with training in self-management skills; and 6) Serve as a key knowledge source for services and information needed for clients to have healthier, more stable lives
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(4.16) COMMUNITY HEALTH WORKER (CHW) RATIO

Authority: 1.1 VIII(B)

Submit template provided by MDHHS demonstrating adherence CHW ratio requirement. MHP must maintain a CHW to enrollee ratio of one full-time CHW per 10,000 Enrollees not later than January 1, 2020.

PROVIDERS

(2.6) MHP PROVIDER DIRECTORY

Authority: 1.1XIII(F)

*MDHHS will conduct secret shopper calls of a sample of open PCPs listed in the on-line MHP Provider Directory (same PCPs called in **October**) to check for provider availability accuracy as well as contact/address information accuracy. In calculating percentages, PCPs accepting all new patients will count as 1 point, PCPs who have conditions on who they will accept as new patients will count as ½ point (if the conditional status is not indicated in the Provider Directory). Item will be scored as either Pass or CAP Needed. Passing is at least 75% of the sample for:*

- 1) PCPs who are listed as accepting new patients and confirm this during the call
- 2) PCPs who have matching phone number/address information in the MHP Provider Directory as confirmed during the call or found on the 4275 submitted to MAXIMUS.

(2.13) MHP CLAIMS MONITORING

Authority: XIV(F)(4)

***Submit** policy and procedures outlining the process used to review a sample of claims against medical records to confirm providers are adhering to requirements and submitting appropriate claims for services. Policies and procedures must address the following:*

- 1) Reviewing that medical records are signed and dated
- 2) Reviewing that medical records are retained for 10 years
- 3) Reviewing medical records against claims to confirm appropriate information was included on claims

MEMBERS

(3.7) BENEFITS MONITORING PROGRAM

Authority: 1.1XI(I)

***Submit** policy and procedures that demonstrate/address the following: Utilize a systemic method for identification of Enrollees who meet the criteria for BMP*

- 1) Utilize the BMP-PROM system for the identification of BMP candidates
- 2) Assignment of provider and/or pharmacy.
- 3) Notify the Enrollee of BMP placement with effective date no less than 12 days later
- 4) Notify Enrollee of provider and/or pharmacy assignment with effective date no less than 12 days later
- 5) MHP must participate in MDHHS Fair Hearings if Enrollee appeals any adverse action
- 6) Provides education to the Enrollee on the correct utilization of services
- 7) Assist in removing barriers to correct utilization of services and make appropriate referrals to behavioral health and substance use disorder providers when appropriate
- 8) Monitor the utilization of services to determine if BMP and education have modified behavior

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- 9) Establish timelines for the review of each Enrollee to determine if goals and guidelines are met and may be removed from BMP
 - 10) **Plan ensures policies follow MDHHS policy**
 - 11) All remedies and sanctions must be allowed by Medicaid policy and State and Federal law. Prior to implementing new remedies and sanctions, the MHP must obtain written approval from MDHHS
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QUALITY

(4.1) CLINICAL PRACTICE GUIDELINES (NCQA: DEEMABLE NO SUBMISSION NECESSARY)

Authority: 1.1XI(A)

Complete and **submit** if applicable, Clinical Practice Guidelines Table (MQIC and other sources)

- 1) List of MQIC CPGs adopted
 - 2) Copies from other sources (include source of guideline(s), date last reviewed, date last sent to providers)
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(4.2) POLICY/PROCEDURE FOR CLINICAL PRACTICE GUIDELINES (NCQA: DEEMABLE NO SUBMISSION NECESSARY)

Authority: 1.1XI(A)

Submit:

- 1) Policies and Procedures for CPGs
 - 2) Highlight any changes that have been made since last submission
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MIS

(5.5) THIRD PARTY RECOVERY QUARTERLY REPORT

Authority: 1.1XVII(G)(7)

Complete and **submit** Third Party Recovery report for **FY2020 Q1 October 1, 2019 through December 31, 2019** to the TPL FTP site

OIG

(6.1) (6.2) (6.3) (6.4) (6.5) (6.6) PROGRAM INTEGRITY

Authority: 1.1XVIII (G, H)

FEBRUARY 15, 2020

Complete and **submit** Program Integrity form and related reports for **Reporting Period October 1, 2019 through December 31, 2019:**

- 1) Tips and Grievances
 - 2) Data Mining
 - 3) Audits
 - 4) Provider Dis-enrollments
 - 5) Overpayments Collected
 - 6) EOB Reporting Requirements
-

ADMINISTRATIVE

(1.1) ORGANIZATIONAL CHART

Authority: 2.1III(C)

- 1) **Submit** Completed organizational chart with an effective date. MUST NOT BE DRAFT
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(1.2) ADMINISTRATIVE POSITION DESCRIPTIONS

Authority: 2.1I(A)

Complete and **submit** Administrative Position Table showing dates of changes made within the last 12 months and submit appropriate Clinical Licenses

- 1) Dates of changes within acceptable time limits
 - 2) Copies of Clinical Licenses and/or Certifications
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PROVIDERS

(2.6) MHP PROVIDER DIRECTORY

Authority: 1.1XIII(F); 3.2 II

MDHHS will review MHP's website to ensure that a current Provider Directory is maintained for each county in the service region:

- 1) List all contracted PCPs, specialists, hospitals, pharmacies, DMEs, vision, mental health and ancillary providers
 - 2) Provide PCP information including name, address, telephone numbers, hospital affiliations, non-English languages spoken and if accepting new patients
 - 3) Lists PCP day and hours if MHP does not maintain full compliance with office hour information on the 4275 provider file
 - 4) Lists specialist information including name, address, telephone number and hospital affiliation
 - 5) Is in a machine-readable format
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(2.11) MAC PRICING

Authority: 1.1VI(D)(11, 12), MCL400.109I

Submit process for Maximum Allowable Cost (MAC) pricing reconsiderations in compliance with MCL400.109I

- 1) Submit process for MAC pricing reconsiderations
- 2) Process includes policy that MAC and pharmacy pricing standards are updated at least every 7 days
- 3) Process must be available and provided to providers and pharmacists

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- 4) **Notification to the pharmacy** must include identification of 3 national drug codes, if there are 3 or more available, and all available national drug codes, if there are fewer than 3, for the drug in question that are available and deliverable
 - 5) Process must be completed in 10 business days, with all notification to the pharmacy in either written or electronic form
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MEMBERS

(3.11) CSHCS UTILIZATION MANAGEMENT

Authority: 1.1

Submit policy and procedures related to prior authorization for CSHCS services. P&P must:

- 1) Ensure the review criteria for authorization decisions are applied consistently and require the reviewer consult with the requesting Provider when appropriate.
- 2) Require UM decisions be made by a health care professional who has appropriate clinical expertise regarding the service under review.

Note: For prior authorization decisions related to CSHCS Enrollees, MHP encouraged to consult with the Office of Medical Affairs Medical Consultants to determine pediatric sub specialists, hospitals and ancillary providers available and appropriate to render services to CSHCS Enrollees. Contractor is also encouraged to utilize Office of Medical Affairs Medical Consultants for assistance in determining appropriate durable medical equipment for CSHCS Enrollees.

MIS

(5.3) CONSOLIDATED ANNUAL REPORT

Authority: 3.2II(A, C), Appendix 3

ALL COMPONENTS INCLUDING EPSDT

Submit Annual Report

- 1) Health Plan Profile (MSA-126) *(included in CR packet)*
- 2) Financials
 - a) Annual Statement
 - b) Risk Based Capital
 - c) Statement of Actuarial Opinion
 - d) FIS 317 – Revenue and Expense Report for HMOs
 - e) FIS 320 – HMO Inpatient Discharges & Benefits Payout Report
 - f) FIS 321 – Working Capital Calculation
- 3) Health Plan Data Certificate (MSA 2012) *(included in CR packet)*
- 4) Health Plan Malpractice Litigation Report (MSA-129) *(included in CR packet)*
- 5) Physician Incentive Program (PIP)

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- 6) Medicaid Certificate of Coverage (*plan may indicate if this is available on web*)
 - 7) EPSDT Member Incentives
 - 8) EPSDT Provider Incentives
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PROVIDERS

(2.14) DENTAL PROVIDER DIRECTORY REPORT

Authority: Appendix 14 & 15

Submit Provider Directory Template (provided by MDHHS). Template will include provider directory and access ratios.

MEMBERS

(3.1) MEMBER MATERIAL – ID CARD AND MEMBER HANDBOOK

Authority: 1.1XIII(E)(1)

MEMBER MATERIAL: ID CARD AND MEMBER HANDBOOK MUST BE MAILED WITHIN 10 BUSINESS DAYS OF NOTIFICATION OF ENROLLMENT

Submit a 12-month report (**CY 2019**) broken down by month documenting ID cards mailed 1st class within 10 business days and Member Handbook mailed within 10 business days of notification of enrollment. The report should include **at a minimum** the date the enrollment file was available, the date of the mailings including member ID cards and member packets, if mailed separately, whether the mailings were 1st class or 3rd class, and the number of ID cards, member packets and members in each month. **Submit** a copy of health plan ID card which includes Medicaid ID number.

- 1) ID cards mailed 1st class (submit report demonstrating the 10 days' mailing requirement)
 - 2) Copy of health plan ID card which includes Medicaid ID number
 - 3) New member packets, including member handbook are mailed (submit report demonstrating the 10 days' mailing requirement)
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(3.2) MEMBER HANDBOOK

Authority: 1.1XIII(E)(2)

MDHHS will review MHP's handbook on the website for contract requirements:

Information for all Members

- 1) 6.9 grade reading level
- 2) Culturally appropriate
- 3) Table of contents
- 4) Managed Care uniform definitions
- 5) How to access the provider directory, including any applicable web URL address
- 6) Advance Directives
- 7) Availability and process for accessing Covered Services that are not the responsibility of the Contractor, but are available to its Enrollees

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- 8) Description of all available Contract Services
- 9) Copayment requirements
- 10) Rights to designate specialist as PCP
- 11) Enrollees' rights and responsibilities. Must include a statement that conveys that Contractor staff and affiliated Providers will comply with all requirements concerning Enrollee rights
- 12) Allow enrollees access to network or plan OB/GYNs and Pediatricians for routine services without a referral
- 13) Enrollee's right to receive FQHC and RHC services
- 14) Enrollees' right to request information regarding physician incentive arrangements including those that cover referral services that place the physician at significant financial risk (more than 25%), other types of incentive arrangements, and whether stop-loss coverage is provided
- 15) Enrollee's right to request information on the structure and operation of the Medicaid Health Plan
- 16) Explanation of any service limitations or exclusions from coverage
- 17) Explanation of counseling or referral services that the Medicaid Health Plan elects not to provide, reimburse for, or provide coverage of, because of an objection on moral or religious grounds. The explanation must include information on how the Enrollee may access these services
- 18) Grievance, Appeal and Fair Hearing procedures and timeframes including how to file a Grievance with the Medicaid Health Plan and the internal Grievance resolution process
- 19) How Enrollees can contribute towards their own health by taking responsibility, including appropriate and inappropriate behavior
- 20) How to access hospice services
- 21) How to choose and change PCPs
- 22) How to contact the Contractor's Member Services and a description of its function
- 23) How to access out-of-county and out-of-state services
- 24) How to obtain emergency transportation
- 25) How to obtain non-emergent transportation covered under this Contract
- 26) How to obtain medically-necessary durable medical equipment (or customized durable medical equipment)
- 27) How to obtain oral interpretation services for all languages, not just prevalent languages
- 28) How to obtain written materials in alternative formats for Enrollees with special needs
- 29) How to obtain written information in prevalent languages, as defined by the contract
- 30) How to access community-based supports and services in Enrollees' service area
- 31) Contractor's toll-free number for member services, medical management and the toll-free number Enrollees use to file a Grievance or Appeal and for any other unit providing services directly to Enrollees
- 32) Pregnancy care information that conveys the importance of prenatal care and continuity of care to promote optimum care for mother and infant
- 33) Procedure for obtaining benefits, including any requirements for service authorizations and/or specialty care and for other benefits not furnished by the Enrollee's primary care provider
- 34) Signs of substance use problem, available substance use disorder services and accessing substance use disorder services
- 35) Vision services, family planning services, and how to access these services
- 36) Well-child care, immunization, and follow-up services for Enrollees under age 21 (EPSDT)
- 37) What to do in case of an emergency and instructions for receiving advice on getting care in case of any emergency. The extent to which, and how, after hours and emergency coverage is provided, including:
 - (1) what constitutes an emergency medical condition and emergency services, (2) the fact that prior

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authorization is not required for emergency services, and (3) the fact that Enrollee has a right to use any hospital or other setting for emergency care. Enrollees should be instructed to activate emergency medical services (EMS) by calling 9-1-1 in life threatening situation

- 38) What to do when family size changes
- 39) WIC Supplemental Food and Nutrition Program
- 40) Any other information deemed essential by the Medicaid Health Plan and/or MDHHS
- 41) The amount, duration, and scope of benefits available under the Contract in sufficient detail to ensure that Enrollees understand the benefits to which they are entitled
- 42) Restrictions, if any, on the Enrollee's freedom of choice among network providers
- 43) The extent to which, and how, Enrollees may obtain benefits, including family planning services and supplies from Out-of-Network Providers. This includes an explanation that the Contractor cannot require an Enrollee to obtain a referral before choosing a family planning provider
- 44) Information on how to report suspected Fraud or Abuse
- 45) Information on how to access continued services upon transition to health plan.
- 46) Information on the availability of telehealth/telemedicine, where applicable
- 47) Information on MIHP and how to access

Information for Healthy Michigan Plan Members

- 48) HMP enrollees provided habilitative services
- 49) HMP enrollees provided dental services

Submit:

- 50) Evidence that beneficiary requests for printed handbooks are processed within 5 business days
-

(3.3) MEMBER NEWSLETTERS

Authority: 1.1XIII(C)(1)(b)

MDHHS will review MHP's website to ensure member newsletter meets the requirements of the contract:

- 1) 6.9 reading grade level
 - 2) Culturally appropriate
 - 3) Distributed at least twice per year
-

(3.4) WEBSITE IS MAINTAINED AND REVIEWED

Authority: 1.1XIII(C)(1)(d); (E)(2); VIV(A)(9)

MDHHS will review MHP's website to ensure it contains appropriate content:

- 1) Information on how to contact the health plan
- 2) Preventative health information
- 3) Health and wellness programs
- 4) Updates on covered services

- 5) Provider directory
 - 6) Grievance and appeal information
 - 7) MCO common drug formulary
 - 8) Member handbook
 - 9) Provider appeal information
 - 10) Claims process
-

QUALITY

(4.10) ADDRESSING HEALTH DISPARITIES – POPULATION HEALTH MGMT (PHM)

Authority: 1.1X(B)(1)(b)

Submit *Policies/Procedure for providing population health management services where telephonic and mail-based care management is not sufficient or appropriate, including the following areas: (If MHP passed these items in the last compliance review, and the contracts have not changed, an attestation that the contract includes the required content will be acceptable. Any item not passed in the last compliance review must be submitted.)*

- 1) Adult and family shelter for Enrollees who are homeless
 - 2) The Enrollee's home
 - 3) The Enrollee's place of employment or school
-

(4.14) MI HEALTH ACCOUNT VENDOR OVERSIGHT

Authority: XII(B)

Submit *a description of ongoing monitoring of MI Health Account Vendor which must include:*

- 1) Review of all Maximus required reports
 - 2) Participate in all quarterly oversight meetings with MI Health Account Vendor and description of processes to follow-up on issues identified during the course of oversight
 - 3) Description of monitoring related to member education on cost-sharing responsibilities including welcome letter, statements, and payment coupons
-

(4.15) MEMBER INCENTIVE

Authority:

Submit *Policy/Program Description that outlines the MHP process for members receiving an incentive. This includes, at minimum, the following:*

- 1) Method of receiving and processing completed Health Risk Assessments and identifying which members are eligible for incentives, including:

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- a) HRAs completed during the FFS period, and
 - b) Second and subsequent year HRAs
 - 2) Process to ‘flag’ those members for an incentive in the MIS/administrative system
 - 3) Process for identifying member who have identified health risk reduction goals on HRA and outreach to these members. Report of members reached and documentation of support services, education, or other interventions provided by MHP
 - 4) Process for outreach and education on the completion of second and **subsequent year** HRAs
 - 5) Description of updates to all policies/procedures related to revisions to HMP Health Risk Assessment and new Healthy Behaviors Incentives
 - 6) **Weekly submission of the 5944 Healthy Behaviors file**
-

MIS

(5.3) MANAGEMENT DISCUSSION AND ANALYSIS

Authority: 3.2II(J)

Submit:

- 1) Management Discussion and Analysis
-

(5.6) PHARMACY/MCO COMMON FORMULARY

Authority: 1.1 VI(D)

Submit all paid/denied/rejected/reversed claims for the time periods of **10/01/19-10/08/19 and 01/01/20-01/08/20.**

- 1) Accurate NCPDP 831 Rejections
 - a) Must have NCPDP 831 rejection coding set as the primary rejection for carve-out claim
 - b) Must have less than 0.5% noncompliant claims
 - 2) Accurate NCPDP 70 Rejections
 - a) Must have less than 0.1% noncompliant claims for products covered on the Common Formulary
 - 3) Must have non-controlled refill thresholds set at no greater than 75%
-

OIG

(6.7) OIG PROGRAM INTEGRITY – **FRAUD COMPLIANCE PROGRAM**

Authority: 1.1VXIII(A); 42CFR§438.608

Fraud Compliance Program

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- 1) **Submit** a compliance plan and additional documentation considered to be proof of administrative and management arrangements or procedures designated to detect and prevent fraud, waste and abuse

Arrangements or procedures must include the following:

- 2) Policies and procedures, administrative arrangements, standards of conduct, and any additional documentation that supports commitment to comply with Program Integrity requirements
- 3) Documentation that support compliance officer, compliance committee, and SIU roles in the organization
 - a) Organization chart(s) displaying:
 - i. Compliance Officer who reports directly to the Chief Executive Officer and the Board of Directors
 - ii. Regulatory Compliance Committee that sits at the MHP level or the corporate level
 - iii. Special Investigations separate from **compliance**, utilization review and quality of care function
 - A. Part of the MHP corporate structure, OR
 - B. Operates under contract with the MHP
- 4) Documentation of employee **education and any associated testing** on preventing, recognizing, and reporting FWA. In addition to employee training materials, FWA education materials made available to provider and members (e.g., bulletins, newsletters, or blast-faxes) must be supplied to gauge availability and accuracy
 - a) Program Integrity and/or FWA Training/Education for:
 - i. Senior Management
 - ii. Compliance Officer
 - iii. Employees
 - b) Communication of compliance officer contact information to employees
 - c) Communication of FWA reporting processes to employees
 - d) **Documentation of policies and procedures relating to annual review and revision of employee education and training materials**
- 5) Documentation of guidelines for:
 - a) Communication between compliance officer, compliance committee, and employees
 - b) Communication between SIU and law enforcement, MDHHS OIG, and other entities, including provider and members. Also includes coordination of investigation of suspected criminal act with law enforcement agencies
 - c) Documentation of meeting/training sessions conducted by compliance officer and/or compliance committee concerning FWA
 - d) Documentation of providing MDHHS OIG contact information to employees, providers, and members on an annual basis (within the past year)
- 6) Documentation of formal policies and procedures that address internal process for investigating, tracking, and closing complaints relating to compliance. Documentation of formal compliance infractions and subsequent penalties, **including corrective action plan procedures**
- 7) Documentation of **policies and procedures for internal monitoring of member utilization and provider billing** practices:
 - a) Documentation of **advanced system edits to identify potential FWA before a claim is paid**
 - b) Documentation of **the review process that gauges effectiveness of system edits**
 - c) Documentation of **software and/or monitoring systems (or vendors) relating to the detection of FWA after adjudication**

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- 8) Documentation of SIU/auditing practices, including:
 - a) FWA complaint/case intake, including any forms and/or methods used to capture employee, provider, and member grievances and/or complaints
 - b) Substantiation of a complaint/case
 - c) Documentation of audit/investigation policies and procedures
 - 9) Documentation of audit/investigation closure and response to findings
 - a) Documentation of formal corrective action processes relating to members and providers
 - b) Documentation of overpayment collection policies and procedures, including the appeal rights and adjustment of encounter claims
 - 10) Documentation of policy and process to verify services billed by providers were received by members, including verification that excluded services are included in the process
 - 11) Documentation of credentialing, termination, and payment suspension practices:
 - a) Documentation of policies and procedures for screening affiliates, employees, and owners or controlling interests for criminal convictions and exclusion from Medicaid, Medicare, or any other federally subsidized program the MHP services
 - b) Documentation of procedures for terminating a provider after notification of exclusion (HHS), summary suspension (MDHHS OIG), or loss/restriction of license (LARA)
 - c) Documentation of policy for suspending payment to a provider up on notification by HHS or MDHHS
-

MEMBERS

(3.5) MEMBER GRIEVANCES AND APPEAL RESOLUTION

Authority: 1.1XIII(G)

Submit GAP enrollee letter template: *(If MHP passed these items in the last compliance review, and the contracts have not changed, an attestation that the contract includes the required content will be acceptable. Any item not passed in the last compliance review must be submitted.)*

- 1) Must acknowledge receipt of each grievance and appeal
- 2) Ensure that individuals who make decisions on grievances and appeals were not involved in the previous level of decision making and have clinical expertise when an appeal involves a clinical issue
- 3) Must advise enrollee of their right to a Fair Hearing with the State of Michigan
- 4) Written authorization from the member for the provider to act on behalf of the member for non-expedited grievance and appeals
- 5) Provisions for enrollee benefits to continue pending resolution of the appeal
- 6) Explanation of the appeal process

Submit policies for Grievance and Appeals. Policies and Procedures must: *(If MHP passed these items in the last compliance review, and the contracts have not changed, an attestation that the contract includes the required content will be acceptable. Any item not passed in the last compliance review must be submitted.)*

- 1) Include that appeal and grievance notices are available in the prevalent non-English languages in its Service Area
- 2) Confirms it uses only MDHHS approved materials and information relating to Grievances and Appeals
- 3) Appeal and fair hearing procedures and timeframes including:
 - a) Contractor must allow Enrollees 60 days from the date of the Adverse Benefit notice in which to file an Appeal
 - b) Contractor must make a determination on non-expedited Appeals no later than 30 days after an Appeal is submitted in writing by the Enrollee
 - c) Contractor must make a determination on Grievances within 90 days of the submission of the Grievance
- 4) Ensure availability of assistance in the filing process
- 5) Explain the right to request a State Fair Hearing after the Contractor has made a determination on an Enrollee's appeal which is adverse to the Enrollee
- 6) Explain, when requested by the Enrollee, benefits that the MHP seeks to reduce or terminate will continue if the Enrollee files an Appeal or a request for State Fair Hearing within the timeframes specified for filing
- 7) Include only one level of Appeal for Enrollees. Ensure MHP provides the Enrollee with Grievance, Appeal and Fair Hearing procedures and timeframes to all Providers and Subcontractors at the time they enter into a contract

(3.6) WRITTEN MEMBER APPEAL DECISIONS RENDERED

Authority: 1.1XIII(G); 3.2 II(G)

Submit Member Grievance and Appeal Log (*April 2019-March 2020*) separated into the four benefit plans: MA-MC; HMP-MC; MME-MC; CSHCS-MC

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- 1) 30 calendar days for a non-expedited appeal. Health plan's decision may be extended for an additional 10 business days if the health plan has not received requested information, if it benefits the enrollee
 - 2) 72 hours from receipt for an expedited appeal
 - 3) Transportation issues (must be highlighted/easy to sort out)
 - 4) Rate of grievance and appeals for CSHCS enrollees for **April 2019-March 2020** (# of grievance and appeals over total # of CSHCS enrollees in MHP)
 - 5) Rate of PA appeals for CSHCS enrollees for **April 2019-March 2020** (# of PA appeals over total # of CSHCS enrollees in MHP)
 - 6) Log submission
-

(3.8) CSHCS COLLABORATION

Authority: 1.1V(N)

Submit policies and procedures related to collaboration with Local Health Departments (LHDs) to coordinate care for CSHCS Enrollees. Policies/procedures should address: *(If MHP passed these items in the last compliance review, and the contracts have not changed, an attestation that the contract includes the required content will be acceptable. Any item not passed in the last compliance review must be submitted.)*

- 1) Communication on development of Care Coordination Plans
- 2) Quality assurance coordination
- 3) Care planning for Enrollees transitioning into adulthood
- 4) Utilization of an electronic system by which providers and other entities can send and receive client level information for the purpose of care management and coordination
- 5) Sharing Enrollee information with LHD to coordinate care without specific agreements
- 6) How the MHP assesses the need for a care manager and family-centered care plan developed in conjunction with the family and care team
- 7) That Enrollees and families have the opportunity to provide input on Contractor policies and procedures that influence access to medical services or member services
- 8) Information about Children's Multidisciplinary Specialty (CMDs) Clinics

Web Review:

- 9) Must include educational content and outreach information specifically directed to CSHCS Enrollees with a mechanism for CSHCS Enrollee and family to contact specially-trained staff to assist them
-

(3.9) PCP SELECTION POLICIES & PROCEDURES

Authority: 1.1V(E)

Submit policies and procedures describing how members choose a PCP, are assigned to a PCP, and how they may change their PCP. Must include:

- 1) Providing members the opportunity to change their PCP regardless of whether the PCP was chosen by the member or assigned by the MHP
- 2) Members may change PCP by telephone or written notification (web based is allowed)
- 3) No restrictions on the number of times a member can change PCPs with cause

- 4) Implements member PCP assignment within five business days of receipt of member's PCP selected request.
 - 5) Any policy that restricts the member's ability to change PCPs without cause was approved by MDHHS prior to implementation
 - 6) MHP reports PCP selections, changes, deletions to MDHHS on 5284 files within 10 business days of changes
-

(3.10) CSHCS PCP REQUIREMENTS

Authority: 1.1V(F)

Submit policies and procedures describing how CSHCS members are assigned a PCP. Must include:

- 1) CSHCS Enrollees are assigned to CSHCS-attested PCP practices that provide family-centered care.
 - 2) MHP obtains a written attestation from PCPs willing to serve CSHCS Enrollees that specifies the PCP/practice meets the following qualifications:
 - a) Is willing to accept new CSHCS Enrollees with potentially complex health conditions
 - b) Regularly serves children or youth with complex chronic health conditions
 - c) Has a mechanism to identify children/youth with chronic health conditions
 - d) Provides expanded appointments when children have complex needs and require more time
 - e) Has experience coordinating care for children who see multiple professionals (pediatric subspecialists, physical therapists, behavioral health professionals, etc.).
 - f) Has a designated professional responsible for care coordination for children who see multiple professionals
 - g) Provides services appropriate for youth transitioning into adulthood, including but not limited to; the use of a transition assessment tool and adoption of a transition policy that is publicly posted and specifies:
 - i. the transition time frame
 - ii. transition approach
 - iii. legal changes that take place in privacy and consent at age 18
 - 3) MHP maintains a roster of Providers who meet the criteria listed above and can serve CSHCS Enrollees.
-

QUALITY

(4.9) PMR REVIEW

Authority: 1.1XI(D)

Review of the most current, ***published***, PMR

- 1) Reviewing the most current published PMR rates, as compared to established MDHHS standards
 - 2) Acceptable CAPs received for measures that did not meet the standard
-

(4.12) TOBACCO CESSATION

Authority: 1.1VI(G)

MAY 15, 2020

Submit the Medicaid Tobacco Cessation Benefits Grid as provided by MDHHS detailing tobacco cessation treatment that includes, at a minimum, the following services:

- 1) Approved telephone quit line
 - 2) Individual counseling separate from the 20 outpatient visits
 - 3) Prescription inhaler
 - 4) Nasal spray
 - 5) Non-nicotine prescription medication
 - 6) OTC agents: patch, gum, lozenge
 - 7) Combination therapy
-

MIS

(5.3) QUARTERLY FINANCIALS

Authority: 3.2II(A), Appendix 3

- 1) **Submit** Quarterly Financial Statements and Reports that were submitted to DIFS for **FY2020 Q2: January 1, 2020 through March 31, 2020**
 - a) Quarterly Statement
 - b) Risk Based Capital
 - c) Statement of Actuarial Opinion
 - d) FIS 317 – Revenue and Expense Report for HMOs
 - e) FIS 320 – HMO Inpatient Discharges & Benefits Payout Report
 - f) FIS 321 – Working Capital Calculation
 - g) Third Party Collections
-

(5.4) THIRD PARTY LIABILITY RECOVERY POLICIES AND PROCEDURES

Authority: 1.1XVII(G)

Submit policies and procedures describing TPL recovery. Policies must include:

- 1) MHP seeks to identify and recover all sources of third-party funds based on industry standards and those outlined by MDHHS TPL Division.
 - 2) MHP follows Medicaid Policy, guidance and all applicable state and federal statutes regarding TPL.
 - 3) P&P are consistent with TPL recovery requirements in 42 USC 1396(a) (25), 42 CFR 433 Subpart D.
 - 4) MHP collects any payments available from other health insurers including Medicare and private health insurance in accordance with Section 1902(a)(25) of the Social Security Act and 42 CFR 433 Subpart D.
 - 5) When MHP denies a claim due to third party resources, the MHP provides the other insurance carrier ID, if known, to the billing provider.
 - 6) MHP responds within 30 days of subrogation notification pursuant to MCL 400.106 (10).
-

MAY 15, 2020

(5.5) THIRD PARTY RECOVERY QUARTERLY REPORT

Authority: 1.1XVII(G)(7)

Complete and **submit** Third Party Recovery report for ***FY2020 Q2 January 1, 2020 through March 31, 2020*** to the TPL FTP site

OIG

(6.1), (6.2), (6.3), (6.4), (6.5) (6.6) PROGRAM INTEGRITY

Authority: 1.1XVIII(G, H)

Complete and **submit** Program Integrity form and related reports for ***Reporting Period of January 1, 2020 through March 31, 2020:***

- 1) Tips and Grievances
 - 2) Data Mining
 - 3) Audits
 - 4) Provider Dis-enrollments
 - 5) Overpayments Collected
 - 6) EOB Reporting Requirements
-

PROVIDERS

(2.6) MHP PROVIDER DIRECTORY

Authority: 1.1XIII (F)

MDHHS will conduct secret shopper calls of a sample of open PCPs listed in the on-line MHP Provider Directory (same PCPs called in *October* & February) to check for provider availability accuracy as well as contact/address information accuracy. In calculating percentages, PCPs accepting all new patients will count as 1 point, PCPs who have conditions on who they will accept as new patients will count as ½ point (if the conditional status is not indicated in the Provider Directory). Item will be scored as Pass or Fail. Passing is at least 75% of the sample for:

- 1) PCPs who are listed as accepting new patients and confirm this during the call
- 2) PCPs who have matching phone number/address information in the MHP Provider Directory as confirmed during the call or found on the 4275 submitted to MAXIMUS.

MEMBERS

(3.12) PREGNANT WOMEN DENTAL POLICIES AND PROCEDURES

Authority: 1.1IV(O)

Submit policies and procedures related to pregnant women dental eligibility and services.

QUALITY

(4.3) QIP EVALUATION AND WORK PLAN; UM PROGRAM AND EFFECTIVENESS REVIEW

Authority: 1.1XI(A, B); 3.2II(B)

Submit the following approved Quality Improvement documents with approval dates:

- 1) Current year program description
- 2) Current year work plan
- 3) Previous year program evaluation
- 4) Annual Quality Program worksheet completed. **Must include highlights, document names and page numbers as required**

Submit the following approved Utilization Review documents:

- 5) Current year program description which includes: Approval dates; Highlighted changed since last submission
- 6) Previous year effectiveness review/evaluation

(4.4) QI & UM POLICIES/PROCEDURES

Authority: 1.1XI(I)

Submit final approved QI & UM policies and procedures (if new or changed) OR provide narrative attestation if no changes have occurred.

- 1) Provide page reference and highlight changes since last submission
 - 2) Include policy and procedure language which gives management authority to the Medical Director
-

(4.17) DENTAL DATA EXTRACT

Authority: 1.1X(A)(2)(a)

Submit dental data as outlined in the data extract specifications provided by MDHHS. Template will be provided

(4.18) ORAL HEALTH QUALITY – QIP EVALUATION AND WORK PLAN FOR ORAL HEALTH; UM PROGRAM AND EFFECTIVENESS REVIEW

Authority: 1.1X(A, B); 3.2II(B)

Submit the following approved Quality Improvement documents with approval dates:

- 1) Current year program description
- 2) Current year work plan
- 3) Annual Quality Program worksheet completed. Must include highlights, document names and page numbers as required

Submit the following approved Utilization Review documents:

- 4) Current year program description which includes: Approval dates and highlighted changes since last submission
-

(4.19) ORAL HEALTH QUALITY – QI & UM POLICIES AND PROCEDURES

Authority: 1.1XI(I)

Submit final approved QI & UM policies and procedures:

- 1) Provide page reference and highlight changes since last submission
 - 2) Include policy and procedure language which gives management authority to the Medical Director
-

JUNE 15, 2020

(5.1) MIS HEALTH PLAN MAINTAINS AN INFORMATION SYSTEM THAT COLLECTS, ANALYZES, INTEGRATES AND REPORTS DATA AS REQUIRED BY MDHHS

Authority: 1.1XI(H); XV(A); V(A)

Submit Operational plan and screen prints, if applicable, demonstrating: *(If changes, otherwise provide narrative attestation)*

- 1) Member enrollment and disenrollment
- 2) Provider enrollment
- 3) Third party liability activity
- 4) Claims payment
- 5) Grievance and Appeals tracking
- 6) Encounter reporting
- 7) Assignment to PCP within one month if member does not choose a PCP at the time of enrollment
- 8) Quality report such as tracking and recall for EPSDT service and immunization reporting, enrollee access and satisfaction
- 9) Appropriate use of CC360: designate 1 Super Managing Employee (SuME) and at least one Managing Employee

For HMP Enrollees Only: ***Submit*** operational plan and screen prints, if applicable, demonstrating:

- 10) Collection and tracking of HMP enrollee-specific Health Risk Assessment information, provided in the MDHHS specified format
 - 11) Collection and tracking HMP enrollee-specific healthy behavior and goal information for MHP enrollees, provided in the MDHHS specified format
-

(5.2) HEALTH PLAN HAS A WRITTEN PROCEDURE TO ELECTRONICALLY PROCESS ENROLLMENTS AND DIS-ENROLLMENTS

Authority: 1.1XV(B)

Submit written procedure to electronically process enrollments and dis-enrollments and submit screen prints showing: *(If changes, otherwise provide narrative attestation)*

- 1) Reconciling of enrollment files
- 2) Name
- 3) Address
- 4) Phone number
- 5) Parents
- 6) Gender
- 7) Language spoken
- 8) Race/Ethnicity
- 9) Guardian

For HMP Enrollees only: ***Submit*** screen prints showing:

- 10) Enrollee income

- 11) Income/Group composition
 - 12) Federal poverty level
-

(5.3) AUDITED FINANCIAL STATEMENT

Authority: 3.2II(C)

Submit :

- 1) Audited Financial Statement
-

OIG

(6.8) OIG PROGRAM INTEGRITY

Authority: 1.1VIII(B); 42 CFR§438.606; 42 CFR§438.608

Submit *Annual Program Integrity Report for **FY19 for the dates of October 1, 2018 – September 30, 2019***

- 1) Including quarterly submission from February **2019**, May **2019**, August **2019** and November **2018**
 - 2) Certified by MHP Chief Executive Officer (CEO), Chief Financial Officer (CFO), or an individual who reports directly to the CEO or CFO with delegated authority to sign for the CEO or CFO so that the CEO or CFO is ultimately responsible for the certification
 - 3) Certification must attest that, based on best information, knowledge and belief, the information specified is accurate, complete and truthful
 - 4) **Compare the report to the plan submitted for FY19 and in the report explain inconsistencies between the plan and the report as applicable**
-

(6.9) OIG PROGRAM INTEGRITY

Authority: 1.1VIII(B)

Submit

- 1) *Annual Program Integrity Plan for **FY20 to include date from October 1, 2020 – September 30, 2021***

QUALITY

(4.5) HEDIS IDSS

Authority: 3.2II(D)

Submit the following HEDIS materials (Refer to annual HEDIS letter from MDHHS for instructions)

- 1) Audited IDSS in electronic format which includes: ART, CSV and data-filled workbook
 - 2) Copy of signed and dated attestation of accuracy and public reporting authorization – Medicaid letter
-

(4.7) PERFORMANCE IMPROVEMENT PROJECTS (MHP-INITIATED PIPs)

Authority: 1.1XI(C)

Submit documentation for all MHP initiated PIPs (do NOT include EQRO PIP documents)

(4.16) COMMUNITY HEALTH WORKER (CHW) RATIO

Authority: 1.1 VIII(B)

Submit template provided by MDHHS demonstrating adherence CHW ratio requirement. MHP must maintain a CHW to enrollee ratio of one full-time CHW per 7,500 Enrollees not later than July 1, 2020.

OIG

(6.10) OIG PROGRAM INTEGRITY

Authority: 1.1XVIII(F); 42CFR§438.610

MHP and Provider Enrollment, Screening and Disclosure Requirements

- 1) Complete applicable attestation form
-

ADMINISTRATIVE

(1.3) GOVERNING BODY

Authority: 2.1III

Submit:

- 1) List of Board Members with term length
 - 2) Board meeting dates
 - 3) Board meeting minutes (**Will be reviewed on-site – do not submit**)
 - 4) Board Member appointment policy
-

(1.4) MANDATORY ADMINISTRATIVE MEETINGS

Authority: 3.1 I(A)

MDHHS will track contractor or contractor representative attendance at the following meetings

- 1) Bi-Monthly Administrative Issues (Bi-monthly)
 - 2) Clinical Advisory Committee (Quarterly)
 - 3) CEO (Bi-monthly)
 - 4) Operations (Bi-Weekly)
 - 5) QI Directors (Bi-monthly)
 - 6) Other meetings as directed by MDHHS
-

(1.5) DATA PRIVACY & INFORMATION SECURITY

Authority: Standard Contract Terms, 24b

- 1) **Submit** annual audit findings from comprehensive independent third-party audit of data privacy and information security program
-

PROVIDERS

(2.16) PBM SERVICE ORGANIZATION CONTROLS REPORT (SOC-1)

Authority: 1.1VI(D)(20)(d)(1)

Submit copy of Service Organization Controls report (SOC-1) audit of the PBM's services and activities.

MEMBERS

(3.13) CSHCS CONSULTATION

AUGUST 15, 2020

Authority: 1.1X(D)(1)(G)

MDHHS Review. Complete two (2) CSHCS consultation calls with MDHHS prior to August. MHP must submit information as requested and specified by Office of Medical Affairs staff and as outlined below.

- 1) Office of Medical Affairs will schedule a telephone conference twice per year with a MDHHS CSHCS Medical Consultant and the Medical Director and nurse reviewer of the health plan.
 - 2) Six weeks prior to the meeting, the CSHCS Medical Consultant will request cases (approx. 4 or 5) from the health plan to conduct an initial review.
 - 3) Three weeks prior to the meeting, the health plan will provide their cases electronically via MCPD FTP.
-

QUALITY

(2.12) MATERNAL INFANT HEALTH PROGRAM (MIHP) ACTIVITIES

Authority: 1.1VI(N)

Submit a narrative with page numbers and document names for items references below (a-i) **Submit** annual report on MIHP activities, including:

- 1) Provide a summary and template(s) of executed agreements. Only include the template if it is different than the DHHS format. Agreements must include:
 - a) Medical coordination, including pharmacy and laboratory coordination
 - b) Data and reporting requirements
 - c) Quality assurance coordination
 - d) Grievance and Appeal resolution
 - e) Dispute resolution
 - f) Transportation
 - g) Enrollee referral MIHP Provider organization within 30 days of MIHP eligibility determination, if the Enrollee is not already enrolled in another evidenced based home-visiting program
 - h) Sufficient number of MIHP Providers to meet Enrollee service and visitation needs within the required response time according to MDHHS MIHP protocols
 - i) Service delivery response times
 - 2) Specific examples of collaborative approaches and program success
 - 3) Summary of quality improvement initiatives
 - 4) Send dates of MIHP regularly scheduled meetings including locations and agendas
 - 5) Policies and procedures related to referring to behavioral health and out-of-network
-

(4.6) HEDIS FINANCIAL AUDIT REPORT (FAR)

Authority: 3.2 II(D)

Submit HEDIS Final Audit Report (refer to annual HEDIS letter from MDHHS for instructions)

- 1) A copy of the MHP's NCQA-certified HEDIS compliance auditor's signed and dated Final Audit Opinion and report
-

(4.13) FAMILY PLANNING GRID

Authority: 1.2V(G)

Submit the Family Planning Grid as provided by MDHHS detailing family planning services that include, at minimum, the following:

- 1) Ensure that enrollees have full freedom of choice of family planning providers, both in-network and out-of-network
 - 2) Allow enrollees to seek family planning services, drugs, supplies and devices without prior authorization
 - 3) Regarding type, duration, or frequency of drugs, supplies and devices for the purpose of family planning, be not more restrictive than Medicaid FFS
 - 4) Maintain accessibility and confidentiality for family planning services
-

MIS

(5.3) QUARTERLY FINANCIALS

Authority: 3.2 II(A), Appendix 3

- 1) **Submit** Quarterly Financial Statements and Reports that were submitted to DIFS **FY2020 Q3 April 1, 2020 through June 30, 2020**
 - a) Quarterly Statement
 - b) Risk Based Capital
 - c) Statement of Actuarial Opinion
 - d) FIS 317 – Revenue and Expense Report for HMOs
 - e) FIS 320 – HMO Inpatient Discharges & Benefits Payout Report
 - f) FIS 321 – Working Capital Calculation
 - g) Third Party Collections
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(5.5) THIRD PARTY RECOVERY QUARTERLY REPORT

Authority: 1.1XVII(G)(7)

Complete and **submit** Third Party Recovery report for **FY2020 Q3 April 1, 2020 through June 30, 2020** to the TPL FTP site.

(5.7) THIRD PARTY WEEKLY MATCH REPORTS

Authority: 1.1 XVII (G)(8)

MDHHS Review of downloads of TPL Weekly Match Reports. MHPs must be downloading the reports monthly at a minimum.

OIG

(6.1) (6.2) (6.3) (6.4) (6.5) (6.6) PROGRAM INTEGRITY

Authority: 1.1XVIII (H)

Complete and **submit** Program Integrity form and related reports for **FY2020 Q3 April 1, 2020 through June 30, 2020**

- 1) Tips and Grievances
 - 2) Data Mining
 - 3) Audits
 - 4) Provider Dis-enrollments
 - 5) Overpayments Collected
 - 6) EOB Reporting Requirements
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