

Uniform Auditing Process for Behavioral Health Services Providers

(FY2021 Appropriation Act - Public Act 166 of 2020)

March 1, 2021

Sec. 927. (1) *The department shall, in consultation with the Community Mental Health Association of Michigan, establish, maintain, and review as necessary, a uniform community mental health services auditing process for use by CMHSPs and PIHPs.*

(2) *The uniform auditing process required under this section must do all of the following:*

(a) *Create uniformity in the collection of data and consistent measurement of the quality, efficacy, and cost effectiveness of provided services and supports.*

(b) *Establish a uniform audit tool that contains information necessary for the uniform community mental health services auditing process and adheres to national standards.*

(c) *Strive to meet the needs of community mental health service beneficiaries and meet all statewide audit requirements.*

(d) *Maintain audit responsibility at the local agency level.*

(3) By March 1 of the current fiscal year, the department shall submit a report to the senate and house appropriations subcommittees on the department budget, the senate and house fiscal agencies, and the senate and house policy offices on the implementation status of the uniform auditing process and any barriers to implementation.

(4) *A state department or agency that provides, either directly or through a contract, community mental health services and supports must comply with the uniform auditing process and utilize the audit tool maintained by the department. All forms, processes, and contracts used by the state that relate to the provision of community mental health services and supports must comply with the uniform auditing process.*

(5) *As used in this section, “national standards” means standards established by a national accrediting entity such as the Joint Commission, Commission on Accreditation of Rehabilitation Facilities, Council on Accreditation, National Committee for Quality Assurance, or other credible body as approved by the department.*



Boilerplate 927(3) PA 166 of 2020

In its contract with the Prepaid Inpatient Health Plans (PIHPs), the Michigan Department of Health and Human Services (MDHHS) addresses several requirements pertinent to service provider audits. One of these components addresses reciprocity standards. As such, PIHPs have established statewide reciprocity for audits related to Inpatient Psychiatric Programs and Specialized Residential Programs, which are the most “shared” programs between PIHP regions. Specific efforts include the following:

- The PIHP region where a provider is located is established as the responsible (or “home”) PIHP for completing an audit.
- A statewide platform called “GroupSite” has been established by the PIHPs where audit results and any corrective actions are made available to the other PIHPs for review and acceptance.
- The audits include policy, recipient rights, and quality reviews.
- In April of 2020, there was a single statewide audit tool used for Specialized Residential Programs.

The most prominent barrier for complete implementation of these efforts are the privacy laws that do not allow the “home” PIHP to review the records of individuals from other PIHP regions. In situations where concerns are identified with records, other PIHPs may still need to complete their own audits.

Additionally, through a Provider Network Management Committee, the PIHPs will be reviewing provider needs and moving this audit process to other shared providers. MDHHS recommends continued support for this committee as they have been deliberate and effective in meeting their goals and expectations, the emergence of the COVID-19 pandemic has stalled progress as the PIHPs had to quickly shift their focus in response. Progress will continue when the impact of the pandemic begins to subside. MDHHS also monitors contractual compliance with the reciprocity standards. In addition to audit relief for providers, the PIHPs will be working to address other administrative burdens for providers and MDHHS supports these efforts as well:

1. Training and Continuing Education Reciprocity
 - State Training Guidelines Workgroup established by the PIHPs
 - Identified acceptable trainings for workers that are available statewide mostly benefitting the direct care workforce
 - PIHPs/Community Mental Health Services Programs accept these trainings regardless of where the worker completed them
 - Provider organizations accept workers who have completed these trainings
2. Contracting and procurement
 - Reciprocity is being established within regions
 - Statewide is being reviewed
3. Credentialing and background checks
 - Reciprocity is being established within regions
 - Statewide is being reviewed