

# Consolidated Audits for Behavioral Health Services Provider

(FY2020 Appropriation Act - Public Act 67 of 2019)

**December 31, 2019**

***Sec. 927. The department shall determine what steps are necessary to allow a behavioral health services provider operating in multiple counties to utilize a single audit or consolidate audits, in whole or in part, in order to reduce the administrative and financial burden on both the service provider and the department. The department shall submit a report identifying potential barriers and solutions to the senate and house appropriations subcommittees on the department budget, the senate and house fiscal agencies, the senate and house policy offices, and the state budget office by December 31 of the current fiscal year.***



## Boilerplate 927 PA 67 of 2019

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 will be 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. MDHHS also monitors contractual compliance with the reciprocity standards. In addition to audit relief for providers, the PIHPs are 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