## CMHSP/PIHP or Subcontracting Provider Agency Compliance Report

(FY2017 Appropriation Act - Public Act 268 of 2016)

## June 1, 2017

Sec. 994. (2) By June 1 of the current fiscal year, the department shall report to the house and senate appropriations subcommittees on the department budget, the house and senate fiscal agencies, and the state budget office all of the following:

(a) A list of each CMHSP, PIHP, and subcontracting provider agency that is considered in compliance with state program review and audit requirements under subsection (1).

(b) For each CMHSP, PIHP, or subcontracting provider agency described in subdivision (a), all of the following:

(*i*) The state program review and audit requirements that the CMHSP, PIHP, or subcontracting provider agency is considered in compliance with.

(*ii*) The national accrediting entity that reviewed and accredited the CMHSP, PIHP, or subcontracting provider agency.



NICK LYON, DIRECTOR

Michigan Department of Health & Human Services Behavioral Health and Developmental Disabilities Administration Fiscal Year 2017 Appropriation Bill Section 994(2) Boilerplate Report

## Background

The Behavioral Health and Developmental Disabilities (BHDDA) leadership is committed to partnering with the Prepaid Inpatient Health Plans (PIHPs) and provider systems to reduce duplicative oversight while, at the same time, assuring the recipients of services and the Centers for Medicare and Medicaid Services (CMS) that appropriate oversight continues.

A workgroup was initiated in 2012 and met under the leadership of the BHDDA staff. The workgroup consisted of members from the PIHPs, Community Mental Health Services Programs (CMHSPs) and provider network systems. Recommendations for workgroup attendees were initiated by the Michigan Association of Community Mental Health Boards (MACMHB), and meetings were fluid as to numbers of members.

## **Status Report**

Deemed status is defined by current Michigan Mental Health Code (MHC) Administrative Rule R330.2702 as waiving portions of the Michigan Department of Health and Human Services (MDHHS) certification review activities on a CMHSP, if a CMHSP is accredited by a recognized national accreditation agency. Of the 46 CMHSPs in Michigan, all but 2 have national accreditation and have received "Deemed Status." A list of CMHSPs and their accreditation organization is attached to this report. It was the consensus of the workgroup that the legislative boilerplate description of "Deemed Status" is broader in application than the MHC definition. Therefore, if a PIHP/CMHSP is granted deemed status by the DHHS, the reduction or elimination of a site review would result.

The only site review activities currently conducted by the Behavioral Health and Developmental Disabilities Administration involve the provision of 1915(i) state plan amendment services for Autism, and three federal 1915(c) waiver programs (Habilitation Supports Waiver, Children's Waiver Program, and Waiver for Children with Serious Emotional Disturbance). All other Behavioral Health and Developmental Disabilities Administration site review activities were placed on hold when the Department initiated the 2013 Application for Participation of Medicaid Specialty Prepaid Inpatient Health Plans process. At the present time negotiations continue with the Centers for Medicare and Medicaid Services over the waiver authority(ies) the Department will utilize for its service delivery system and the quality management oversight activities that will be required in the Department's next waiver application. Once those activities are completed, the Department can resume the process of assessing if accreditation processes cover any of the required oversight areas and generate the additional report elements required in 994 (2)(a) and (b).

CMHSP	ACCREDITATION
Allegan	CARF
AuSable	COA
Barry	CARF
Bay-Arenac	CARF
Berrien dba Riverwood Center	CARF
Central Michigan	JOINT COMMISSION
Clinton-Eaton-Ingham	CARF
Genesee	CARF
Gogebic	CARF
Gratiot	CARF
Hiawatha	CARF
Huron	COA
Ionia	CARF
Kalamazoo	CARF
Lapeer	CARF
Lenawee	JOINT COMMISSION
LifeWays	CARF
Livingston	JOINT COMMISSION
Macomb	CARF
Manistee-Benzie dba Centra Wellness Network	CARF
Monroe	JOINT COMMISSION
Montcalm	CARF
Muskegon dba Health West	CARF
network180	CARF
Newaygo	CARF
North Country	CARF
Northeast	CARF
Northern Lakes	CARF
Northpointe	CARF
Oakland	CARF
Ottawa	CARF
Pathways	COA
Pines	CARF
Saginaw	CARF
Saginaw St. Clair	CARF
St. Joseph	CARF
Sanilac	CARF
Samac	CARF
Summit Pointe	JOINT COMMISSION
Tuscola	CARF
Van Buren	CARF
Washtenaw	JOINT COMMISSION
Washenaw West Michigan	CARF
Woodlands/Cass	CARF
wooulanus/Cass	