Title: Long Term Care Collaboration Process for Policy and Audit Issues

Date: April 2, 2015

Purpose:

To establish an ongoing process to collaboratively meet to discuss concerns and issues regarding Medicaid policy and audit with broad application for nursing homes providing services and receiving reimbursement for Medicaid residents. This process is needed to address inconsistencies in application of policy among auditors and across years and providers that have been further compounded by delays in audit process. This process should also address application of policy to new scenarios not addressed in the manual (i.e. cell phones). Changes to existing Medicaid policy have to be promulgated through the Medicaid promulgation process. This process will not directly resolve specific provider audit issues but they may get resolved as a consequence of discussion results.

Medicaid providers are expected to follow existing Medicaid policy. If department staff have not been applying this existing policy uniformly across offices it can be brought to the workgroup for discussion.

Collaboration will be with Michigan Department of Community Health staff representing the policy, audit and rate setting areas along with representatives from the provider community including Health Care Association of Michigan, Michigan County Medical Care Facility Council and Leading Age Michigan.

Process:

1. DCH, Provider Associations or other Providers can initiate a discussion by notifying any member of the stakeholder workgroup. The stakeholder workgroup includes provider associations, interested providers and department representatives from relevant areas of audit, policy and rate setting. Meetings will occur quarterly at a minimum and will be open to any interested party.
2. The initiator of the topic will need to present a statement that identifies the issue, reasons for the concern, supporting regulation and/or policy. The initiator will become the leader of the discussion on this topic unless they designate another person. All interested participants should review the issue and provide their comments or other related documents to all participants prior to the meeting. Potential meeting topics will be posted to the department website.
3. Meeting agenda will be coordinated by the department and will begin with an overview of the topic by the initiator followed by an open discussion and review of regulations or policies as appropriate.
4. At the end of the meeting next actions/steps will be identified and assigned to an individual who will be responsible for completing each step. A subsequent meeting will be established if necessary or email consensus if appropriate. Minutes for the meeting will be provided within 10 days and will be emailed to the meeting participants and posted to the website for viewing.
5. Final follow-up or implementation will be shared with all participants.

Long Term Care Collaboration Process for Policy and Audit Issues – cont'd.

<u>Communication</u>:

The department will create a webpage to include a specific topic area for LTC and communication of collaboration process topics will be shared in this area. Providers have the ability to send email questions to the department via a new email address DCH-Office-of-Audit@Michigan.gov. The department will post questions and answers on the website along with "Hot Topics" and other audit findings. The existing Medicaid Promulgation process for Medicaid policy changes will be followed to update the Medicaid Provider Manual.