

MICHIGAN DEPARTMENT OF HEALTH AND HUMAN SERVICES
Behavioral Health and Developmental Disabilities Administration

CAP INCENTIVE SCORING METRIC

A site review that has a plan of correction approved during the fiscal year is eligible for the incentive during the same fiscal year. The Corrective Action Plan (CAP) incentive will be distributed as follows:

- **Timeliness: 5%**
A total of 50 points can be earned annually for timely CAP submission (within thirty (30) calendar days of the date on the cover letter sent with the issuance of Site Review Reports). The total points will be the same regardless of the number of CAPs due to MDHHS.
- **Accuracy: 5%**
A total of 50 points can be earned annually for accurate CAP submission. The total points will be the same regardless of the number of CAPs due to MDHHS.

Accurate CAP submissions include the following:

- Reasonable timeframes as to when corrective action(s) will take place (i.e., *within the next 90 days*).
- Remediation plans for **both** the **Individual** and **Systemic** levels.
- The PIHP's plan to provide ongoing monitoring and oversight of the Provider.
- Detailed responses with specific actions taken, dates for remediation completion and/or implementation, specific case information/performance measures, as well as systemic action taken to prevent future occurrence.

NOTE: If any extenuating circumstance compromises the PIHP's ability to remediate, limitations need to be specified with detail of how they will be addressed within reasonable timeframes and will be considered on a case-by-case basis.

- **CAP Resolution: 90%**
A total of 1000 points will be allocated annually for resolution of CAPs. The points will be awarded based on PIHP resolution of any plan of correction remedial action items that result from a CWP, SEDW, and HSW site review by 90-day follow up period end date. The total potential points will be the same regardless of the number of plans of correction remedial action items needing to be addressed. The total number of dimensions/indicators on the CWP, SEDW, and HSW Site Review Report will vary by PIHP region. Points will be awarded for each indicator determined to be met during the MDHHS 90-day review. The total dimensions/indicators will determine the points per dimension/indicator.

A PIHP meeting all timely and accuracy deliverables and submission and meeting all CAP resolution indicators would receive the entire incentive amount offered. Scoring examples can be found below.

Example 1

Timeliness and Accuracy Deliverables

1. PIHP 1 site review for CWP, SEDW, and HSW occurs June-July 2024.
2. Site Review Reports are issued by MDHHS on August 14, 2024.
(typically issued 2 weeks to 45 days following the site review)
3. Plans of correction submitted by September 13, 2024, would earn 50 timeliness points.
4. Department completes their review and approves CAP on September 30, 2024. PIHP would earn 50 accuracy points (Any return of the CAP for revision or for additional information would disqualify the PIHP for this incentive.)
5. **PIHP 1 earns 100% (100 out of 100 possible points) of the timeliness and accuracy deliverables.***

***Penalties will not be incurred due to MDHHS delays.**

CAP Resolution Deliverable

1. PIHP 1 plan of correction has a total of 888 indicators. $1000/888 = 1.13$ points scored per indicator.
2. Plan of correction 90-day follow-up period ends in December 2024.
3. MDHHS staff determine the following:
 - CWP Total: 65 indicators possible; 11 not met (54 met)
 - SEDW Total: 129 indicators possible; 30 not met (99 met)
 - HSW total: 694 indicators possible; 268 not met (426 met)
4. Total Indicators met: 579. Total Indicators not met: 309. Score: $654.27 = (579 * 1.13)$
5. **PIHP 1 earns 65% of the incentive amount offered for the CAP Resolution component.**

Preliminary scores/award amounts are communicated to PIHPs by end of January 2025.

Final scores/award amounts are communicated to PIHPs by end of February 2025.

Payments are made to PIHPs by April 2025.

Example 2

Timeliness and Accuracy Deliverables

1. PIHP 2 site review for CWP, SEDW and HSW occurs June-July 2024.
2. Site Review Reports issued by MDHHS on August 14, 2024.
3. Plans of correction submitted by September 13, 2024, would earn 50 timeliness points.
4. MDHHS completes their review. On October 2, 2024, MDHHS sends submission back to the PIHP for revision. PIHP 2 does not earn 50 points for effective CAP submission (The return of the CAP for revision or for additional information disqualifies PIHP 2 for this incentive.)
5. **PIHP 2 earns 50% (50 out of 100 possible points) of the timeliness and accuracy deliverables.***

***Penalties will not be incurred due to MDHHS delays.**

CAP Resolution Deliverable

1. Plans of correction have a total of 750 indicators. $1000/750 = 1.33$ points per indicator.
2. Plan of correction 90-day follow-up period ends in January 2025.
3. MDHHS staff determine the following:
 - CWP Total: 50 indicators possible; 5 not met (45 met)
 - SEDW Total: 100 indicators possible; 10 not met (90 met)
 - HSW total: 600 indicators possible; 30 not met (570 met)
4. Total Indicators met: 705. Total Indicators not met: 45. Score: $940 = (705 * 1.33)$
5. **PIHP 2 earns 94% of the incentive amount offered for the CAP Resolution component.**

Preliminary scores/award amount communicated to PIHP by end of January 2026.

Final scores/award amounts communicated to PIHPs by end of February 2026.

Payments made to PIHPs by April 2026.

Appeal Process

MDHHS will provide an incentive award notice by end of January. PIHPs have the right to appeal an incentive award. The appeal must be in writing in response to the MDHHS award notice and be submitted to MDHHS within 30 calendar days. The appeal must include:

- a. A description of the reason for the appeal.
- b. Action the PIHP would like MDHHS to consider.
- c. Any supporting documentation.

The PIHP will be given a written decision on the appeal from MDHHS. MDHHS will provide a final incentive award notice by the end of March.