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| **General Administration/Staff Qualifications** (desk or on-site review) | |  |  |  |  |
| 4.1 | Provider maintains the following insurance policies:   * Commercial General Liability Insurance $1M Each Occurrence/$1M Personal and Advertising Injury, $2M General Aggregate/$2M Products/Completed Operations. *Note, Contractor must have policy endorsed to add “the SOM, its departments, divisions, offices, commissions, officers, employees, and agents as additional insured using endorsement CG 20 1 0 11 85, or both CG 20 10 12 19 and CG 20 37 12 19* * Professional Liability (Errors and Omissions) insurance $3M each occurrence/$3M Annual Aggregate * Automobile Liability Insurance (if transporting consumers) * Worker’s Compensation * Employers Liability Insurance $500,000/each accident; $500,000 each employee by disease; $500,000 aggregate disease. * Privacy and Security Liability (Cyber Liability) Insurance $1M each occurrence/$1M annual aggregate. Note- provider must have their own policy cover information security and privacy liability, privacy notification costs, regulatory defense and penalties, and website media content liability. | Contract (section 15) | Policy certificate – can be obtained from PAYOR Contract Manager  ***Reviewer Note:*** *The note indicating that the contractor must have the policy endorsed is no longer required by MDHHS per FY24 MDHHS/PIHP Contract.* | Yes (2)  No (0)  Partial (1)  NA |  |
| 4.2 | The provider has a systematic process (i.e., Compliance Plan) in place to ensure that the organization is performing business functions in a manner in compliance with federal and state laws concerning health care billing practices and fraud detection and/or prevention.  Note: These regulations include HIPAA, Stark I and II, Medicare/Medicaid anti-kickback statute and False Claims Act. | Contract (section 22 – Compliance Program),  42 CFR 438.608 | Compliance Plan  Policies  Procedures | Yes (2)  No (0)  Partial (1)  NA |  |
| 4.3 | Provider has safeguards established that restrict the use or disclosure of information concerning Consumers. | Contract (section 21 – Consumer Medical Records)  Mental Health Code, Section 748, 748a, and 750 | Policy/Procedure | Yes (2)  No (0)  Partial (1)  NA |  |
| 4.4 | Provider has a provision for the disposal of consumer protected health information (PHI) that will render the documents unreadable, indecipherable, and otherwise cannot be reconstructed. | HITECH Act,  Contract (Section 22 - HIPAA) | Policy/Procedure | Yes (2)  No (0)  Partial (1)  NA |  |
| 4.5 | Provider maintains a comprehensive individual service record system as required by contract record requirements. | Contract (section 21 – Consumer Medical Records),  MDHHS Medical Services Administration (MSA) Policy Bulletin Chapter 1, the MDTMB Retention General Schedule #20 Community Mental Health Programs | Policy/Procedure related to retention, privacy and confidentiality | Yes (2)  No (0)  Partial (1)  NA |  |
| 4.6 | Provider has evidence of utilizing data to improve processes and services such as surveys, feedback, internal assessment and evaluation, etc. | Contract section 24 – Quality Improvement Program, Site Reviews, Performance Monitoring | QAPIP, surveys, feedback mechanisms, internal monitoring processes | Yes (2)  No (0)  Partial (1)  NA |  |
| 4.7 | Provider has a system in place for credentialing and recredentialing licensed health care professionals in accordance with MDHHS credentialing and recredentialing processes. Staff file and policies and procedures meet all requirements.  *\*See staff qualification review tool.* | MDHHS Contract  Medicaid Provider Manual | Policy/Procedure and Sample of records | Yes (2)  No (0)  Partial (1)  NA |  |
| 4.8 | Provider conducts background checks for staff as required.   * Criminal background (initial and ongoing) * \*National Sex Offender registry (initial) * \*State Sex Offender registry (initial) * Central registry (initial) * OIG (initial and monthly) * GSA/SAM (initial and monthly) * MI Sanction Provider database (initial and monthly).   \**New requirement 10/1/23. Staff files prior to this date may not include registry checks.* | Autism regional contract,  MDHHS/PIHP Contract,  MDHHS Credentialing policy | Policy, procedures and/or Sample record review | Yes (2)  No (0)  Partial (1)  NA |  |
| 4.9 | Provider has a written system in place to ensure individuals transporting consumers hold a valid driver’s license appropriate to the class of vehicle being operated | Medicaid Provider Manual – NEMT; Michigan Vehicle Code Act 300 of 1949 | Policy/Procedure | Yes (2)  No (0)  Partial (1)  NA |  |
| 4.10 | The provider has a process to ensure that minimum training requirements for staff are met and evidence is documented in staff files. | Contract  MSHN Regional Training Grid | Policy/Procedure and/or sample records | Yes (2)  No (0)  Partial (1)  NA |  |
|  |  |  | **TOTAL SCORE/%:** | **Points** | **%** |

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| **Limited English Proficiency & Cultural Competence** (desk or on-site review) | |  |  |  |  |
| 5.1 | The provider has an administrative policy and procedure in place for identifying and assessing the language needs of individuals served | 42 CFR 438.10  42 CFR 438.400  MI Medicaid Manual  MDHHS PIHP Contract  MDHHS Customer Service Standards | Policy/procedure | Yes (2)  No (0)  Partial (1)  NA |  |
| 5.2 | The provider has a written policy and/or procedure on accessing oral interpretation services, free of charge to consumers and has a process to notify consumers of these services. | MDHHS/PIHP Contract  MDHHS Customer Service Standards  CMHSP Policy/Procedures | Policy/procedure  Tagline posting with top 15 languages; examples of materials in other languages | Yes (2)  No (0)  Partial (1)  NA |  |
| 5.3 | Written materials are available in easily understood manner in alternative formats and in an appropriate manner that takes into consideration the special needs of those who are visually limited or have limited reading proficiency, as required by ADA. | MDHHS/PIHP Contract  MDHHS Customer Service Standards  CMHSP Policy/Procedures  Regional ABA Contract | Examples of materials in alternative formats; 6.9 grade reading level  Policy, Procedures | Yes (2)  No (0)  Partial (1)  NA |  |
| 5.4 | The provider has a written policy or procedure on cultural diversity to ensure that services are delivered in a culturally diverse manner to all consumers including those with LEP and diverse cultural and ethnic backgrounds. | MDHHS PIHP Contract  Regional ABA Contract | Policy/procedure | Yes (2)  No (0)  Partial (1)  NA |  |
|  |  |  | **TOTAL SCORE/%:** | **Points** | **%** |