

WCHO PIHP/CA Policy for the COMMUNITY MENTAL HEALTH PARTNERSHIP OF SOUTHEASTERN MICHIGAN and the LIVINGSTON-WASHTENAW COORDINATING AGENCY	<i>Policy and Procedure</i> Performance Improvement
Department: Performance Improvement Author: Michael Harding	Local Policy Number (if used)
Approval Date 4/17/12	Implementation Date 5/1/12

I. PURPOSE

To establish and ensure an integrated affiliation wide Performance Improvement (PI) system is implemented and operating in accordance with applicable standards of the Prepaid Inpatient Health Plan (PIHP) and Comprehensive Specialty Services Network (CSSN) within a defined scope for the Community Mental Health Partnership of Southeastern Michigan (CMHPSM).

To ensure the following values are upheld in improvement processes based on the approved PI Program Description/Plan that include but are not limited to:

- Organizational systems learning
- Alignment with strategic planning
- Stakeholder (consumers, family members, providers, staff) involvement
- Replication of Successes by fostering and enabling affiliation and local improvements.

To ensure the following outcomes are being addressed:

- The reductions of risk factors in service delivery.
- The identification and resolution of specific service delivery and organizational opportunities for improvement.
- Evaluation of specific program components in relation to established measures with evidence of program modifications, redesign or improvement based upon data.
- Evidence of employee, consumer and community stakeholder involvement in needs assessment, service planning and problem identification and resolutions.
- Evidence of service improvements and enhancements including innovative program designs based upon results of quality improvement activities.

II. REVISION HISTORY

DATE	REV. NO.	MODIFICATION
02/28/12	1	

III. PERSONS AFFECTED

Consumers, family members, community members, funders and staff along with others that have an impact on and are impacted by the decisions made within the CMHPSM.

IV. POLICY

Authority:

The CMHPSM integrated PI system is overseen by the PIHP. The PIHP executive director holds the overall responsibility for this PI system while each affiliate director assures implementation within their agency and for involving leadership at the affiliate level. PIHP Performance Improvement initiatives will be prioritized using decision making criteria based on issues that are of high risk, high cost and problem prone areas and that are in alignment with the strategic plan.

This integrated structure is led by the PIHP Performance Improvement Administrator. The PI Administrator is responsible for the implementation of this policy and ensuring the PI system operates in accordance with the PI Program Description/Plan. The PI system is constructed of a PI committee, CSSN representation, standing committees, workgroups, and Ad Hoc PI teams.

Scope:

The PI system for the CMHPSM that includes each CSSN is responsible for the oversight and ensuring the quality of care of consumers. The PI system shall address any issue in need of performance improvement, performance assurance and performance planning that may arise and use improvement processes including but not limited to root cause analysis, plan-do-check-act and problem solving.

The CMHPSM has a value that uncovering root causes is the most effective means to ensure lasting systemic change. When the need for such change has been identified, the use of qualitative and quantitative data will be reviewed to identify

areas that need improvement. These improvement efforts will ensure the success of high quality services are delivered across the entire CMHPSM.

V. DEFINITIONS

CMHPSM: Community Mental Health Partnership of Southeast Michigan, an affiliation of community mental health boards and the PIHP that provides services to Medicaid and Indigent consumers with developmental disabilities, mental illnesses and substance abuse.

CSSN: Comprehensive Specialty Services Network is an organization that is certified as a CMHSP, including a recipient rights systems, services across all populations, has a publicly appointed Board of Directors, and has accreditation from JCAHO.

PIHP: Prepaid Inpatient Health Plan is the oversight entity of Medicaid services within the CMHPSM for Mental Health and Substance Abuse Services.

Performance Improvement System: The PI System is the overarching entity within the CMHSP that is responsible for addressing, implementing and resolving Performance Improvement, Performance Assurance and Performance Planning initiatives.

Performance Improvement Process: A Performance Improvement process is a systematic way of addressing improvement opportunities that involve the use of soft (facilitation techniques, problem solving processes) and hard (data analysis, statistical tests) skills to understand, recommend and implement change.

VI. STANDARDS

- A. The PI system shall ensure that the CMHPSM and local affiliates provide leadership for the implementation of improvement efforts.
- B. The PI system shall adhere to all external and internal standards of governance, management and direct/support services.

- C. The PI system shall be regularly monitored and evaluated to ensure quality components are being implemented along with any external or internal standards or regulation revisions are made.
- D. The PI system program description/plan shall be approved annually by the PIHP board and be adopted by the CSSN.
- E. The PI system shall operate within the annually approved PI program description/plan.
- F. The PI system is a confidential peer review system where aggregate information is shared that is not subject to the Freedom of Information Act (FOIA) or other forms of disclosure.
- G. The PI system shall be organized through an integrated Performance Improvement Committee structure with standing committees, workgroups or Ad Hoc PI teams that regularly report to the PI Committee.
- H. The PI system oversight is the responsibility of an identified Performance Improvement Administrator with overall responsibility by the PIHP executive director.
- I. The PI system shall include consumer and/or family representation, network provider representation, and have medical director consultation to assist the PI committee in addressing any medically significant performance improvements.
- J. The PI system shall ensure that the improvement efforts are prioritized using decision making criteria and are aligned with the strategic plan.
- K. The PI system is responsible for approving, collecting, analyzing and monitoring organizational PI indicators to identify trends and reduce risk.
- L. The PI system shall perform qualitative and quantitative improvement processes that obtain input from stakeholders to ensure high quality change efforts take place led by the PI Administrator or other designated individual or body.
- M. The PI system shall provide leadership, coordinate, collaborate, and or participate in CMHPSM or affiliate programs, boards and stakeholders improvement efforts for the purpose of building upon strengths and reducing the frequency of improvement opportunities led by the PI Administrator or other designated individual or body.
- N. The PI system shall communicate the results of improvement efforts made to necessary stakeholders by the PI Administrator or other designated individual or body.
- O. The PI system shall obtain PI reports and data on time per the agreed upon reporting schedule and in the agreed upon format by the PI Administrator or other designated individual or body.
- P. All CMHPSM network providers shall report all PI data at the specified timeframe per the signed contract with the applicable CMHPSM affiliate led by the PI Administrator or other designated individual or body.
- Q. The CMHPSM affiliate shall withhold payment as outlined in signed contract to a CMHPSM affiliate and or CMHPSM network provider should PI reports and data not be submitted within the necessary timeframe by the PI Administrator or other designated individual or body.

R. All CMHPSM network providers must operate within an approved performance improvement system as defined in the signed contract.

VII. EXHIBITS

A. CMHPSM PI Program Description/Plan

VIII. REFERENCES

Reference:	Check if applies:	Standard Numbers:
42 CFR Parts 400 et al. (Balanced Budget Act)	x	43 8.206, 43 8.236, 43 8.240
45 CFR Parts 160 & 164 (HIPAA)		
42 CFR Part 2 (Substance Abuse)		
Michigan Mental Health Code Act 258 of 1974		
The Joint Commission - Behavioral Health Standards	x	PI 1.10-3.20
Michigan Department of Community Health (MDCH) Medicaid Contract	x	(1/5/12) P.7.1.1
MDCH Substance Abuse Contract		
Michigan Medicaid Provider Manual		
PIHP Policy Review Schedule	x	
Policy Tracking Form		

IX. PROCEDURES

WHO	DOES WHAT
PIHP	<ol style="list-style-type: none"> 1. Provides a written program description/plan 2. Maintains and follows the guidelines as described in the program description and PI policy.

<p>PI Committee</p>	<ol style="list-style-type: none"> 1. Approves and monitors the functions/indicators and information for the PI system as described in the PI system Program Description/Plan 2. Assigns improvement activities to the appropriate standing committee, workgroup, local affiliate or create an Ad Hoc PI team as needed to address areas in need of improvement. 3. Approves Affiliate Committee/Workgroup affiliate/PI Ad Hoc Teams charge. 4. Reviews and provides input on periodic reports to the Affiliation Executive Committee and the Affiliation Committee of the PIHP Board and the full PIHP board.
<p>PI Administrator</p>	<ol style="list-style-type: none"> 1. Participates in PI Committee 2. Communicates necessary information across the CMHPSM 3. Establishes, Maintains and Adheres to a reporting schedule 4. Generates periodic PI reports 5. Reports PI system initiatives to the Affiliation Committee of the PIHP Board and the full PIHP board.
<p>PI Committee Chair</p>	<ol style="list-style-type: none"> 1. Reports PI system initiatives to the Affiliation Executive Committee.
<p>Standing Committees, workgroups, local affiliates and Ad Hoc PI teams</p>	<ol style="list-style-type: none"> 1. Responsible for aligning work plan and functions to the CMHPSM strategic plan. 2. Use PI processes to implement functions and improvement efforts 3. Local affiliates use the PI processes to embed

	<p>improvement efforts across the whole organization down to direct line staff.</p> <ol style="list-style-type: none"> 4. Report periodically based on the reporting schedule and format to the PI Committee the work plan functions and indicators of performance and improvement activities. 5. Make recommendations to the PI committee for implementing PI processes to address areas needing improvement. 6. Responsible for relaying information to and from committee, workgroup, or Ad Hoc Team
PI Committee Members	<ol style="list-style-type: none"> 1. Provide input and feedback on reports provided to the PI committee based on the roles of the members
PI Liaison/Coordinator of CSSN	<ol style="list-style-type: none"> 1. Provide the PI committee periodic reports via the reporting schedule and format. 2. Make recommendations to the PI committee for implementing PI processes to address areas needing improvement. 3. Responsible for relaying information to and from individual CSSN 4. Convenes or ensures that Ad Hoc PI teams are constituted per a PI committee recommendation
Affiliation Executive Committee	<ol style="list-style-type: none"> 1. Provide leadership across the CMHPSM and individual CSSN the value and principles of the PI system. 2. Reviews and provides input/feedback on the annual PI program description/Plan 3. Reviews and provides input/feedback on periodic PI reports 4. Reviews the PI reports prior to being presented to the

	Affiliation Committee of the PIHP Board
CSSN	<ol style="list-style-type: none"> 1. Receives and reviews reports and enacts on any PI related issues as needed. 2. Provides leadership for CSSN the value and principles of the PI system. 3. Approves and provides feedback on local PI projects 4. Adopts the affiliation approved PI program description.
Affiliation Committee of the PIHP Board	<ol style="list-style-type: none"> 1. Provide input and feedback to Annual PI Program description/plan and periodic reports 2. Approves the annual PI program description/plan and periodic reports
PIHP Board	<ol style="list-style-type: none"> 1. Gives final Approval of the PI program description/plan