



Adirondack Health Institute

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POLICY AND PROCEDURE

Title: Quality Assurance and Performance Improvement

Intended Population: Health Home Serving Adults and Children

Effective Date: 03/01/2015

Review Date: 3/1/2021

Date Revised: 2/12/2020, 2/1/2022

Purpose of Policy

The Adirondack Health Institute Health Home (AHIHH) will take an active role in monitoring the quality of the care management services provided within our Health Home network. Periodic reviews and measurement of process and quality measures, as released and published by NYSDOH in October of 2018, will assist in understanding the value of the overall program, the efficacy of any one component, and will also guide our performance improvement efforts. Various data sources will be utilized to provide monthly reports that are inclusive of NYSDOH quality and process measures. Data sources will include, but are not limited to; AHIHH Care Management Record System, MAPP/Salient dashboards, PSYCKES, Medicaid Claims Data, etc.

Scope

1. This policy must be distributed to all AHI Health Home Program staff and all subcontracting Health Home Service Providers.
2. All questions regarding this policy or its implementation may be directed to the Health Home Director.

Statement of Policy

AHI shall develop, disseminate, and review periodic performance reports to all Health Home downstream providers to aid in assist each downstream provider in meeting performance goals.

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Definitions

AHIHH: AHI Health Home, a designated lead Health Home by the New York State Department of Health

Health Home Participant: A Health Home Candidate who is participating in the AHI Health Home and is assigned to an AHI Health Home Services Provider for care management. Also referred to as a “client”.

Health Home Service Provider: An organization that has a fully executed contract (the “Health Home Services Provider Agreement”) with the Adirondack Health Institute to provide health home outreach and/or care management services. Also referred to as “Care Management Agencies (CMAs)”.

Care Management Record System: A structured information system, maintained by the Adirondack Health Institute Health Home (AHIHH), and made available for Health Home Service Providers and Health Home Network Partners to utilize, as applicable and appropriate to their role in the Health Home.

NYS DOH: New York State Department of Health

Quality Assurance: QA is a process undertaken by an organization that assures care is maintained at acceptable levels in relation to specifications of standards for service quality and outcomes. QA is a continuous process that assesses organizational performance, both prospectively and retrospectively, including where and why performance is at risk or has failed to meet standards

Performance Improvement: PI (also called Quality Improvement–QI) is the continuous study and improvement of processes with the intent to better services or outcomes, and prevent or decrease the likelihood of problems, by identifying areas of opportunity and testing new approaches to fix underlying causes of persistent/systemic problems or barriers to improvement. PI in the Health Home program aims to improve processes involved in care management service delivery and member quality of life

Background

The Quality Management and Auditing Policy at AHI is intended to facilitate the effective implementation of the processes necessary to meet the Health Home Program standards and requirements as stipulated by the NYS DOH, federal regulations, and best practices. This policy directs that AHI meet these requirements.

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Quality Assurance

Monthly Process Reviews

Each month AHIHH will conduct a process review that will measure HHSP compliance with Health Home policy and procedures. HHSPs will be provided a monthly corrective action report (if applicable) with their process audit results, including any items needing corrective action. Agencies will either meet the Health Home Standards or not meet Health Home Standards. In order to meet Health Home standards, the majority of the records reviewed must meet Health Home Policy Standards. If a HHSP does not meet Health Home standards on two consecutive Process audits for the same category, then a formal training will be conducted.

Biannual Process Audits

- Eligibility
- Consents
- Care Transitions

Monthly Monitoring and/or Audits

- CANS Assessment
- Health Home Plus
- Children’s HCBS Waiver and
- Continuity of Care
- Plan of Care
- Comprehensive Assessment

See a desk guide for process audit schedule

Eligibility and Consents: AHIHH will select a random sample of cases/ and or pull a report from each HHSP for members who are in an “enrolled” status. AHIHH will send a corrective action report for any chart found to be missing appropriate Health Home Eligibility Documentation or the appropriate Health Home Consents. Those members found to not have adequate Health Home eligibility documentation and/or consent may be subject to voided claims due to the member not being eligible or properly consented in the Health Home Program. Please see the Health Home Qualifying Conditions/Informed Consent Policy for further guidance.

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Quality Indicators:

- ✓ Health Home eligibility is fully documented in the member's care management record
- ✓ Member has consented, and record of consent is documented in the members care management record

Care Transitions: AHIHH will select a random sample of cases from each HHSP for members who had admission alerts in the previous 12 months. AHIHH will send a corrective action report for any member found not to have had sufficient discharge support as per AHIHH Care Transitions policy and procedure. This will also be reviewed when and Care Transition has occurred and was accompanied by an Incident Report submission.

Quality Indicators:

- ✓ HHCM attempted to contact the facility if the member was admitted
- ✓ Record of the member's inpatient stay and/or ER visit is documented in the member's care management record
- ✓ HHCM either participated in or attempted to participate in discharge planning process
- ✓ followed up with the member post care transition to facilitate any needed follow up appointments

Continuity of Care: AHIHH will select a random sample of cases and or pull a report from each HHSP for members who are in Diligent Search status. AHIHH will spot audit to ensure that each HHSP has followed the Continuity of Care Policy and Procedure. AHIHH will send a corrective action report for any chart found to be missing proper documentation. Those members found to not have the adequate number of DSE activities during any given month will be subject to voided claims. Please see the Health Home Continuity of Care Policy for further guidance. Monthly HHSP's will be sent a report of who they have in DSE.

Quality Indicators:

- ✓ 3 diligent search activities were conducted each month diligent search was billed
- ✓ The correct types of DSE activities occurred
- ✓ Disengagement was not avoidable



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Plans of Care: Monthly AHI HH pull a report and distribute to each HHSP for members who were actively enrolled in Health Home and who do not have a Plan of Care in the system. AHI HH will also pull and distribute a report to HHSP's indicating which members have a Plan of Care that is coming due within the next 90 days. AHIHH will also review records to ensure that each HHSP has followed the Plan of Care Policy and Procedure and monitor for quality care planning through Comprehensive Chart Audits. AHIHH will send a corrective action report for any chart found to be missing Quality indicators. All enrolled members must have a Plan of Care started within in the first 60 calendar days of enrollment to bill for Health Home Care Management services. Please see the Plan of Care Policy for Adults and Children for further guidance.

Quality Indicators:

- ✓ Initiation of plan of care within 60 calendar days
- ✓ Plan of care is signed by the member, parent, and/or guardian
- ✓ Plan of Care is updated, at minimum, annually for adults and every 6 months for children

Disenrollment/Transfers: AHIHH will select a random sample of cases from each HHSP for members who were disenrolled within the past 12 months. AHIHH will review records to ensure that each HHSP has followed the Disenrollment Policy and Procedure and that Quality indicators have been met. AHI HH will also monitor disenrollment trends and retention rates for each HHSP. AHIHH will send a corrective action report for any chart found to be missing Quality indicators. Monthly HHSP's serving adults will receive a report indicating those members who have been enrolled at the low-rate code for 12 months or more to support the HHSP's with graduation and disenrollment efforts.

Quality Indicators:

- ✓ The Correct Health Home End reason was selected
- ✓ Proper withdrawal of consent has been completed and uploaded in the members care management record
- ✓ The members plan of care was updated prior to disenrollment; including updating/closing outstanding goals/objectives
- ✓ A discharge plan was made with the member and documented in the members care management record
- ✓ For transfers a warm hand off was attempted



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Comprehensive Assessment: AHIHH will pull a report for each HHSP for members who do not have a comprehensive assessment, an overdue assessment, or an assessment coming due. AHIHH will send a corrective action report for any chart found to be missing Quality indicators. AHIHH will also review records to ensure that each HHSP has followed the Comprehensive Assessment Policy and Procedure and monitor for quality care planning by reviewing and discussing the needs reflected in the Comprehensive Assessment process through Comprehensive Chart Audits.

Quality Indicators:

- ✓ Completion of the comprehensive assessment within 60 calendar days of enrollment
- ✓ Annual completion of the Comprehensive assessment
- ✓ Areas of need in the Comprehensive assessment were discussed with the member will be reviewed during comprehensive chart audits.

CANS-NY Assessment: AHIHH will review members who were enrolled in the Children's Health Home program for more than 60 days. AHIHH will review records to ensure that each HHSP has followed the CANS Assessment Policy. Those members who have been enrolled in Children's Health Home will not be allowed to bill for Health Home Care Management services in the CANS-NY is not completed within the third month of enrollment. Please see the Health Home CANS-NY Policy for further guidance.

Quality Indicators:

- ✓ Completion of the CANS assessment within the first 60 days of enrollment
- ✓ If a CANS-NY was completed prior to 6 months, ensure that there is documentation in the chart as to what the significant event was to initiate a new CANS-NY

Comprehensive Chart Reviews:

AHI HH will conduct comprehensive chart reviews. To review overall chart quality and adherence to policy and procedure. Each month individual service providers will be selected for review. Once per year all Health Home Service Providers will receive a full comprehensive audit.

Chart Reviews (5% of members)

Understanding and adherence to AHIHH Policy and Procedures

Review overall quality of care

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Additionally, AHI HH will review:

- Current staffing qualifications and compliance with required and recommended trainings.
- Review of staffing structure and caseloads
- Ability to provide 24/7 access to care management
- Overall Performance trends
- Response to corrective active requests

AHIHH will select a random sample of cases from each HHSP consisting of unique members with either a Disenrollment or enrollment claim in the previous 12 months. HHSP's are encouraged to utilize the chart review tool to complete a self-assessment and to implement peer/supervisory reviews as part of their internal quality assurance process.

HHSPs will be provided a corrective action report following the comprehensive chart review (if applicable). HHSPs will be required to complete corrective action within 30 days, unless otherwise specified. If corrective action is not completed within the allotted time, the HHSP will be given a performance correction notice and be placed on a performance improvement plan (PIP). If the HHSP scores below a 50% on the comprehensive audit additional records may be pulled and additional training will be scheduled. If a HHSP scores below 50% on two comprehensive audits a HHSP may be placed on notice of termination.

Note: In addition to the comprehensive chart audit and monthly audits, additional audits may occur at any time, for example, in response to a quality concern or corrective action process.

CMA Quality Audit Dispute Process

If the HHSP does not agree with AHIHH finding, they can submit a request for review by emailing healthhome@ahihealth.org. The HHSP can request a meeting to further discuss the findings.

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Corrective Action Process (CAP) – Level 1

Any audits can result in a corrective action process (CAP). The CAP process is generally for information and is not punitive in nature. The corrective action process is designed to support the HHSP through the process of resolving deficiencies as discovered during routine quality management processes. As part of the Corrective Action Process, HHSP’s will be provided with a report for any items requiring corrective action with specified timeframes and suggestions for resolution. The AHIHH team will offer as much support as needed and/or requested during the corrective action process to achieve agreed upon results. If the Health Home service provider fails to address identified deficiencies within the specified timeframes the Health Home Service Provider will move to a formal Performance Improvement Plan (Level Two).

Performance Improvement Plan (PIP) – Level 2

HHSP’s who fail to engage in the Corrective Action Process or who fail to resolve deficiencies in specified timeframes, will be placed on a formal Performance Improvement Plan (PIP). AHIHH may impose sanctions, including suspension or termination, if they fail to comply with the Performance Improvement Plan. When determining the type of sanction to apply for violations of the Health Home Services Agreement and/or AHIHH Policies and Procedures, AHIHH shall consider the following factors:

- Whether the violation was a first time or repeat offense
- The level of culpability of the HHSP
- Whether the violation resulted in harm to a Health Home member or other person
- Whether the violation constitutes a crime under state or federal law

Level 1	Corrective Action Plan (CAP)	Informal/Non-Punitive
Level 2	Performance Improvement Plan (PIP)	Formal/Can be Punitive



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AHI HH will also place a quality focus on member outcomes in addition to the compliance audits. These member outcomes can be measured and monitored from multiple data sources (MAPP, DOH, Netsmart, MCO reports, PSYCKES, and internal data reporting tools). AHI HH will continue to work directly with Health Home Service Providers to help support and train the network on closing gaps in care, assessing and closing gaps in Social Determinates of Health, as well as well as the utilization of other reports that effect Health Home Quality Measures. AHI HH will utilize the below measures to help support member outcomes.

- Monitor Gaps in Care closure rates
- Social Determinates Health Outcome
- Reducing the total cost of care of our members
- Reducing ED and inpatient utilization

A list of NYS Health Home Performance metrics can be found that the Department of Health Website:

https://www.health.ny.gov/health_care/medicaid/program/medicaid_health_homes/performance/

Training

AHIHH will provide support and training for all HHSP’s to ensure high quality care management services are delivered to all members in our health home network. HHSP’s can make training requests by emailing healthhome@ahihealth.org.

Process Audit	Month
Health Home Eligibility	March and June
Consents	April and July
Care Transitions	May and August
Health Home Plus	Monthly Review
CANS-NY Assessment	Monthly Review
HHSC HCBS	Monthly Review
Continuity of Care	Monthly Review
Plan of Care	Monthly Review
Comprehensive Assessment	Monthly Review

Contact Person: Director, Health Home and Care Management

Responsible Person: Lead Health Home and HHSP’s

Approved By: Chief Operating and Compliance Officer