

Policy 7.1

POLICY TITLE:	QUALITY MANAGEMENT	POLICY # 7.1		
Topic Area:	QUALITY		REVIEW DATES	
Applies to:	LRE, Member CMHSPs, and LRE Provider Network	ISSUED BY: Chief Executive Officer	11/21/13	1/1/15
Review Cycle:	Annually		9/9/2022	
Developed and Maintained by:	LRE Chief Executive Officer or Designee	APPROVED BY: Board of Directors		
Supersedes:	N/A		Effective Date: January 1, 2014	Revised Date: September 9, 2022

I. POLICY

The Lakeshore Regional Entity (LRE) and its Member Community Mental Health Service Programs (CMHSPs) will develop, implement, and maintain a Quality Management (QM) system which includes processes for monitoring and oversight of its provider network.

- A. **Quality Assessment Performance Improvement Program (QAPIP) Plan and Report:** LRE and its Member CMHSPs will have a written description of its Quality Assessment and Performance Improvement Program, which specifies an organizational structure which supports a quality assessment system to design, measure, analyze, and improve the outcomes of governance, management, clinical, support functions, and considers internal and external consumer and stakeholder needs and expectations
- B. **Standard Setting:** LRE retains responsibility for establishing quality standards in collaboration with Member CMHSPs. Responsibility for implementing processes for meeting those standards is delegated to the Member CMHSPs.
- C. **Regulatory and Corporate Compliance:** LRE shall comply with 42 CFR Program Integrity Requirements, including designating a LRE Corporate Compliance Officer and establishing an LRE Corporate Compliance Plan.
- D. **Performance Assessments and Conducting Quality Reviews:** LRE regularly audits to ensure services are delivered consistent with person-centered planning guidelines, Michigan Department of Health and Human Services (MDHHS) standards, Medicaid Specialty Supports and Services Contract requirements, and Medicaid regulations. The LRE will conduct an annual audit of its Member CMHSPs and services directly provided by each Member CMHSP as well as the LRE Provider Network. Audits may be conducted as an on-site review, a desk audit, or a combination thereof.
- E. **External Reviews:** LRE retains responsibility, in collaboration with Member CMHSPs, for managing outside entity review processes, including, but not limited to external quality reviews.
- F. **Research:** LRE will review and evaluate proposed and ongoing research projects from Member CMHSPs or LRE Network Providers involving consumers. MDHHS maintains authority to grant approval for all research involving human subjects.

II. PURPOSE

The Lakeshore Regional Entity (LRE) and its CMHSP participants will have a QM system designed to monitor, evaluate, and improve the efficacy, efficiency, and appropriateness of the services provided to consumers and the administrative functions supporting that care.

III. APPLICABILITY AND RESPONSIBILITY

This policy applies to the LRE, its Member CMHSPs, and the LRE Provider Network.

IV. MONITORING AND REVIEW

The Chief Executive Officer or designee will review this policy on an annual basis.

V. DEFINITIONS

Corporate Compliance Plan: Established policy, procedure, guidelines required to prevent, monitor, and remediate instances of abuse and fraud with public funds.

Performance Improvement: An organized, structured process used to identify parts of the program that need addressing due to continuous performance goals, failure to meet Quality Assessment expectations, or results of adverse events.

Quality Assessment: A process for ensuring compliance with specifications, requirements, contractual obligations, or standards and identifying indicators for performance monitoring and compliance with standards.

VI. RELATED POLICIES AND PROCEDURES

- A. LRE QAPIP
- B. LRE Quality Policies and Procedures
- C. LRE Compliance Policies and Procedures
- D. External Review Process
- E. LRE Corporate Compliance Plan

VII. REFERENCES/LEGAL AUTHORITY

- A. 42 CFR 438.240
- B. 42 CFR 438.358
- C. Balanced Budget Act of 1997 (BBA)
- D. 45 CFR 46 Human Subjects Research
- E. Health Insurance Portability and Accountability Act
- F. MDHHS Medicaid Specialty Supports and Services Contract
- G. MDHHS Quality Assessment and Performance Improvement Programs for Specialty Prepaid Inpatient Health Plans Policy

VIII. CHANGE LOG

Date of Change	Description of Change	Responsible Party
9/9/2022	Added LRE Provider Network to applicability	CQO