

February 3, 2017

Lisa Hotovy, CEO
West Michigan CMH
920 Diana Street
Ludington, Michigan 49431












Dear Lisa Hotovy,

The LRE Annual Site Review was conducted for your organization on December 12 & 13, 2016 and the report has been completed. The West Michigan CMHSP's Site Review Plan of Correction Form is attached. Please use this template for your Agency's Plan of Correction submission. Additional documents such as the results of the Program Specific Standards Review, Site Review Summary, Chart Review Summary, Information Management Standards Review and the MMBPIS Source Verification Documents are located on the LRE SharePoint Site. You can access these documents by going to the LRE SharePoint site, clicking on the *Site Review* tab, *West Michigan CMHSP's* folder then the *_FY16/17 Site Review Information* folder and finally the *_LRE Completed Site Review Reports FY17* folder.

The next step for your organization, is to review the completed reports and develop a formal Plan of Correction for all areas that did not meet the overall benchmark standard of 95%. When completed, the Plan of Correction can be sent via email to my attention (debf@lsre.org). The Plan of Correction is due to the LRE by the end of business on March 8, 2017.

LRE Site Review Staff thank you for you and your staff's assistances during this review. West Michigan CMHSP staff were professional, courteous and helpful to the LRE Site Review Staff throughout the entire process and seemed very knowledgeable of the procedures and processes in place at West Michigan CMHSP. Information for the Desk Audit was organized and submitted timely. It was quite evident that West Michigan CMHSP staff were very well prepared for this site review.

Congratulations on your Site Review Results. This is the third site review, LRE Staff has completed for West Michigan CMHSP and improvements are noted from last year. The most significant improvement is noted in the results from the Chart Review portion of the audit. Scores increased for the LRE Chart Review (from 94.3% to 98.8%), the Autism Specific Chart Review (from 92.8% to 95.2%) and the Hab Waiver Chart Review (from 85.5% to 94.9%). The Desk Audit portion of the review has eighteen scored sections, West Michigan CMHSP received a percentage score of 95.8% or higher for sixteen of the eighteen sections, with thirteen of these sixteen receiving a score of 100%. The chart below compares the scores West Michigan CMHSP has received for the last two years compared to this year's scores. It is noted that West Michigan CMHSP showed improvement in 3 areas plus in the total overall score.

West Michigan's Annual Site Review Score Summary		FY 2015	FY 2016	FY 2017	
A.	Admin/Managed Care Functions (Desk Audit) Total Score:	97.95%	98.4%	98.90%	
B.	Program Specific Review Total Score:	96.8%	100%	97.2%	
C.	Information Technology Total Score:	100%	100%	100%	
D. 1.	Staff Training and Credentialing Total Score:	98.5%	99.4%	92.4%	
D. 2.	Autism Staff Training and Credentialing Total Score:		99.4%	98.7%	
D.3	HSW Staff Training and Credentialing Total Score:			94.5%	New
E. 1.	LRE Chart Review Total Score:	96.5%	94.3%	98.8%	
E. 2.	Autism Specific Chart Review Score:		92.8%	95.2%	
E. 3.	Hab Waiver Specific Chart Review Score:		85.5%	94.9%	
F.	MMBPIS Source Verification Review Total Score:	97.7%	100%	98.1%	
G	Medicaid Verification Review Total Score:	100%	100%	95.8%	
H	Critical Incident & Risk Event Verification Total Score:			97.2%	New
West Michigan's Overall Site Review Average Per Fiscal Year		97.4%	96.5%	97.4%	

Note the above chart also shows that several new sections were added to the Site Review for FY2017. The Habilitation Waiver Training & Credentialing Review and the Critical Incident & Risk Event Data Verification were added this year. LRE also reviewed the West Michigan's Behavioral Treatment data process, this area was not scored. For FY2017, Paul Duff continued his reviews of Emergent Level of Care Reviews, Non-Emergent Level of Care Reviews and completed several Customer Interviews. West Michigan CMHSP did well in these areas. The report details can be found at the end of the Plan of Correction Document.

Bill Phelps reviewed two Crisis Residential charts during the audit, and provided the following feedback. He reported that since the service was provided at Brinks, the review consisted of evaluating services provided before and after the crisis episode. For both cases, there were services being provided prior to the crisis authorization to attempt to stabilize. At discharge, there was one case where WCMCMH staff had immediate contact with individual. For the second, there was no documentation of contact for 10 days between discharge and contact; however, it was obvious there was contact, it just was not documented. Recommend WCMCMH encourage staff to document indirect contacts, especially when the individual is discharging from higher intensity services so attempts at contacts and whatnot are documented. With both cases, there was good coordination between Brinks and WCMCMH.

LRE staff reviewers noted a couple of areas in which issues/ concerns were found. One of the most significant concern is in the area of, IPOS specific training for Hab Waiver and Autism staff. There were a good number of staff, that documentation could not be found showing they received IPOS specific training. Plus, the documentation provided for staff who did receive the training is not very informative as it was just a sign in page. Per MDHHS, the documentation needs to show who was trained, on what specific objectives and who provided the training (ensuring the individual providing the training is qualified to do so).

There are also three areas of the Desk Audit that did not meet the 95% standards. These include, Staff Training and Credentialing (92.4%); Hab Waiver Training and Credentialing (94.5%); and Hab Waiver Specific Chart Review (94.9%). The details concerning these including the case cited can be found in the Plan of Correction.

This year's audit was a much more intensive review than previous years and had several new components included. West Michigan CMHSP's overall score for this year's audit increased compared to last year's audit. It went from 96.5% last year to 97.3% this year. LRE Site Review Staff found that West Michigan CMHSP met the quality standards expected of the CMHSP Providers in the region.

If you have any questions or concerns, please feel free to contact me either via email (debf@lsre.org) or phone (231 670 5646).

Sincerely,

Deborah L Fiedler

Deborah L Fiedler, LMSW
Quality Improvement and Operations

CC: Greg Hofman, LRE
Michele Condit
Betsy Reed