

Jeffrey L. Brown, CEO

January 2, 2018

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

Dear Lisa Williams,

The LRE Annual Site Review was conducted for your organization on October 9 & 10, 2017 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, 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 _FY117/18 Site Review Information folder and finally the *LRE Completed Site Review Reports FY18* 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 February 2, 2018.

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 fourth site review LRE Staff has completed for West Michigan CMHSP and improvement is noted from last in the areas of Program Specific Review, Autism Training and Credentialing, HabWaiver Specific Questions Review, MMBPIS and the Critical Incident Source Documentation Review. The Desk Audit has eighteen scored sections, West Michigan CMHSP received a percentage score of 95% or higher for fifteen of the eighteen sections (14 were 100%). The chart below compares West Michigan CMHSP's scores from the previous three years to this year's scores.

West Michigan's Annual Site Review Score Summary		FY 2015	FY 2016	FY 2017	FY2018	
A.	Admin/Managed Care Functions (Desk Audit) Total Score:	97.95%	98.4%	98.9%	97.86%	
В.	Program Specific Review Total Score:	96.8%	100%	97.2%	100%	\geq
C.	Information Technology Total Score:	100%	100%	100%	88.79%	
D. 1.	Staff Training and Credentialing Total Score:	98.5%	99.4%	92.4%	90.37%	1
D. 2.	Autism Staff Training and Credentialing Total Score:		99.4%	98.7%	100%	
D.3	HSW Staff Training and Credentialing Total Score:			94.5%	86.57%	
E. 1.	LRE Chart Review Total Score:	96.5%	94.3%	98.8%	97.50%	\
E. 2.	Autism Specific Chart Review Score:		92.8%	95.2%	88.24%	
E. 3.	Hab Waiver Specific Chart Review Score:		85.5%	94.9%	100%	
F.	MMBPIS Source Verification Review Total Score:	97.7%	100%	98.1%	98.57%	\langle
G	Medicaid Verification Review Total Score:	100%	100%	95.8%	100%	
Н	Critical Incident & Risk Event Verification Total Score:			97.2%	100%	
West Michigan's Overall Site Review Average Per Fiscal Year		97.4%	96.5%	97.4%	96.1%	

During the onsite review, LRE Staff reviewed the West Michigan CMHSP's Behavioral Treatment data process and validated MMBPIS Data and Critical Incident. For FY2018, Paul Duff continued his review 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.

West Michigan CMHSP received their lowest score scores in the HabWaiver Training and Credentialing Section. West Michigan CMHSP received a score of 86.57% for this section. The credentialing / training review found that 32 staff were missing specific IPOS Training. See the HabWaiver Staff Missing Information Report uploaded to the LRE Site Review SharePoint Site for the details on the missing training information and/ or credentialing for reviewed staff.

The Information Technology Review was revised for FY2018 with many new components added. West Michigan CMHSP received overall score of 88.79% for this portion of the review. LRE IT Staff made recommendations which can be found the Plan of Corrections. The following are some of the recommendations made:

- To perform and document a Risk Assessment.
- To develop a policy for the acceptable use for remote access/work from home users
- To develop and formalize a training plan for IT team members.
- To formalize and document current Disaster Recovery procedures in a Disaster Recovery Plan.
- Document testing the Disaster Recovery Plan, including server restoration, for reference and to ensure disaster recovery technologies are working as expected.

The Chart Review Questions completed as part of the onsite review identified a couple of issues. Of the 36 records reviewed, six did not have a Pre-Plan and four showed that the consumer / guardian was not given a copy of IPOS within 15 days. The details including the cases cited can be found in the Plan of Correction.

This year's audit was more intensive review then previous years and had several new components included. West Michigan CMHSP's overall score for this year's audit was 96.1% which indicates West Michigan CMHSP met the majority of 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 (<u>debf@lsre.org</u>) or phone (231 670 5646).

Sincerely,

Deborah L Fiedler

Deborah L Fiedler, LMSW Quality Improvement and Operations Specialist

CC: Greg Hofman, LRE Michele Condit Betsy Reed