



**Commonwealth of Pennsylvania
Department of Human Services
Office of Mental Health and Substance Abuse Services
2021 External Quality Review Report
Community Behavioral Health**

April 2022



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realized.

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Table of Contents

Introduction	4
Overview	4
Objectives.....	4
I: Validation of Performance Improvement Projects	6
Objectives.....	6
Technical Methods of Data Collection and Analysis	7
Findings	8
II: Validation of Performance Measures	9
Objectives.....	9
Technical Methods of Data Collection and Analysis	12
Conclusions and Comparative Findings	14
Recommendations	24
III: Compliance with Medicaid Managed Care Regulations	26
Objectives.....	26
Description of Data Obtained	26
Determination of Compliance.....	28
Findings	29
IV: Validation of Network Adequacy.....	35
Objectives.....	35
Description of Data Obtained	35
Findings	35
V: Quality Studies.....	37
Objectives.....	37
Description of Data Obtained	37
Findings	37
VI: 2020 Opportunities for Improvement – MCO Response.....	40
Current and Proposed Interventions	40
Quality Improvement Plan for Partial and Non-compliant PEPS Standards.....	40
Root Cause Analysis and Quality Improvement Plan.....	47
VII: 2021 Strengths, Opportunities for Improvement and Recommendations	75
Strengths.....	75
Opportunities for Improvement	75
Assessment of Quality, Timeliness, and Access	75
VIII: Summary of Activities.....	78
Performance Improvement Projects	78
Performance Measures.....	78
Medicaid Managed Care Regulations	78
Quality Studies	78
2020 Opportunities for Improvement MCO Response.....	78
2021 Strengths and Opportunities for Improvement.....	78
References	79
Appendices.....	81
Appendix A. Required PEPS Substandards Pertinent to BBA Regulations.....	81
Appendix B. OMHSAS-Specific PEPS Substandards	88
Appendix C: Program Evaluation Performance Summary: OMHSAS-Specific Substandards for CBH Counties.....	90

List of Tables and Figures

Table 2.1: MY 2020 HEDIS FUH 7- and 30-Day Follow-Up Indicators (18–64 Years)	14
Figure 2.1: MY 2020 HEDIS FUH 7- and 30-Day Follow-Up Rates (18–64 Years).....	15
Figure 2.2: Statistically Significant Differences in CBH Contractor MY 2020 HEDIS FUH Rates (18–64 Years).....	16
Table 2.2: MY 2020 HEDIS FUH 7- and 30-Day Follow-Up Indicators (All Ages)	16
Figure 2.3: MY 2020 HEDIS FUH 7- and 30-Day Follow-Up Rates (All Ages).....	17
Figure 2.4: Statistically Significant Differences in CBH MY 2020 HEDIS FUH Rates (All Ages)	18
Table 2.3: MY 2020 HEDIS FUH 7- and 30-Day Follow-Up Indicators (6-17 Years).....	18
Figure 2.5: MY 2020 HEDIS FUH 7- and 30-Day Follow-Up Rates (6–17 Years).....	19
Figure 2.6: Statistically Significant Differences in CBH MY 2020 HEDIS FUH Rates (6–17 Years).....	20
Table 2.4: MY 2020 PA-Specific FUH 7- and 30-Day Follow-Up Indicators (All Ages).....	20
Figure 2.7: MY 2020 PA-Specific FUH 7- and 30-Day Follow-Up Rates (All Ages).....	21
Figure 2.8: Statistically Significant Differences in CBH MY 2020 PA-Specific FUH Rates (All Ages).....	22
Table 2.5: MY 2020 REA Readmission Indicators.....	22
Figure 2.9: MY 2020 REA Readmission Rates for CBH.	23
Figure 2.10: Statistically Significant Differences in CBH/Philadelphia County MY 2020 REA Readmission Rates (All Ages).	23
Table 3.1: Tally of Substandards Pertinent to BBA Regulations Reviewed for CBH	28
Table 3.2: Compliance with Standards, including Enrollee Rights and Protections	29
Table 3.3: Compliance with Quality Assessment and Performance Improvement Program	32
Table 3.4: Compliance with Grievance System.....	33
Table 4.1: Compliance with Standards Related to Network Adequacy	36
Table 5.1: ICWC Quality Performance Compared to Targets and National Benchmarks	38
Table 6.1: CBH Responses to Opportunities for Improvement	41
Table 6.2: CBH RCA and QIP for the FUH 7–Day Measure (All Ages).....	48
Table 6.3: CBH RCA and CAP for the FUH 30–Day Measure (All Ages).....	61
Table 7.1: EQR Recommendations.....	76
Table A.1: Required PEPS Substandards Pertinent to BBA Regulations	81
Table B.1: OMHSAS-Specific PEPS Substandards.....	88
Table C.1: Tally of OMHSAS-Specific Substandards Reviewed for CBH	90
Table C.2: OMHSAS-Specific Requirements Relating to Care Management	91
Table C.3: OMHSAS-Specific Requirements Relating to Complaints and Grievances.....	91
Table C.4: OMHSAS-Specific Requirements Relating to Denials.....	93
Table C.5: OMHSAS-Specific Requirements Relating to Executive Management	93
Table C.6: OMHSAS-Specific Requirements Relating to Enrollee Satisfaction.....	93

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Introduction

The final rule of the Balanced Budget Act (BBA) of 1997 requires that state agencies contract with an External Quality Review Organization (EQRO) to conduct an annual external quality review (EQR) of the services provided by contracted Medicaid Managed Care Plans (MCOs).¹ This EQR must include an analysis and evaluation of aggregated information on quality, timeliness and access to the health care services that an MCO furnishes to Medicaid recipients.

The PA Department of Human Services (DHS) Office of Mental Health and Substance Abuse Services (OMHSAS) contracted with IPRO as its EQRO to conduct the 2021 EQRs for HealthChoices (HC) Behavioral Health MCOs (BH-MCOs) and to prepare the technical reports. The subject of this report is one HC BH-MCO: Community Behavioral Health (CBH). Subsequent references to MCO in this report refer specifically to this HC BH-MCO.

Overview

HealthChoices (HC) Behavioral Health (BH) is the mandatory managed care program which provides Medical Assistance recipients with behavioral health services in the Commonwealth of Pennsylvania (PA). The PA Department of Human Services (DHS) Office of Mental Health and Substance Abuse Services (OMHSAS) determined that the county governments would be offered the right of first opportunity to enter into capitated agreements with the Commonwealth for the administration of the HealthChoices Behavioral Health (HC BH) Program. In such cases, the Department holds the HC BH Program Standards and Requirements (PS&R) Agreement with the HC BH Contractors, referred to in this report as “Primary Contractors.” Primary Contractors, in turn, subcontract with a private-sector behavioral health managed care organization (BH-MCO) to manage the HC BH Program. Forty-three (43) of the 67 counties have signed agreements using the right of first opportunity and have subcontracted with a BH-MCO. Twenty-four (24) counties have elected not to enter into a capitated agreement and, as such, the DHS/OMHSAS holds agreements directly with two BH-MCOs to directly manage the HC BH Program in those counties.

In the interest of operational efficiency, numerous counties have come together to create HealthChoices Oversight Entities that coordinate the Primary Contractors while providing an oversight function of the BH-MCOs. In some cases the HealthChoices Oversight Entity is the Primary Contractor and, in other cases, multiple Primary Contractors contract with a HealthChoices Oversight Entity to manage their HealthChoices Behavioral Health Program. In the CBH managed care network, the City of Philadelphia and Philadelphia County share a common border. As such, the City of Philadelphia is the HealthChoices Oversight Entity and the Primary Contractor that holds an agreement with CBH. CBH is a county-operated BH-MCO. Members enrolled in the HC BH Program in Philadelphia County are assigned CBH as their BH-MCO.

Objectives

The EQR-related activities that must be included in the detailed technical reports are as follows:

- validation of performance improvement projects
- validation of MCO performance measures
- review to determine plan compliance with structure and operations standards established by the State (42 Code of Federal Regulations [CFR] 438.358), and
- validation of MCO network adequacy

Scope of EQR Activities

In accordance with the updates to the CMS EQRO Protocols released in late 2020,² this technical report includes seven core sections:

- I. Validation of Performance Improvement Projects
- II. Validation of Performance Measures
- III. Review of Compliance with Medicaid Managed Care Regulations
- IV. Validation of Network Adequacy
- V. Quality Studies
- VI. 2020 Opportunities for Improvement – MCO Response
- VII. 2020 Strengths and Opportunities for Improvement
- VIII. Summary of Activities

For the MCO, information for **Sections II and III** of this report is derived from IPRO’s validation of the MCO’s performance improvement projects (PIPs) and performance measure (PM) submissions. The PM validation, as conducted by IPRO, included a repeated measurement of two PMs: Follow-up After Hospitalization for Mental Illness, and Readmission Within 30 Days of Inpatient Psychiatric Discharge. The information for compliance with Medicaid Managed Care Regulations in **Section III** of the report is derived from monitoring and reviews conducted by OMHSAS, as well as the oversight functions of the county or contracted entity, when applicable, against the Commonwealth’s Program Evaluation Performance Summary (PEPS) Review Application and/or Readiness Assessment Instrument (RAI), as applicable. **Section IV** discusses the validation of MCO network adequacy in relation to existing Federal and State standards that are covered in the Review of Compliance with Medicaid Managed Care Regulations, **Section III**. **Section V** discusses the Quality Study for the Certified Community Behavioral Health Clinic federal demonstration and the Integrated Community Wellness Centers program. **Section VI**, 2020 Opportunities for Improvement – MCO Response, includes the MCO’s responses to opportunities for improvement noted in the 2020 (MY 2019) EQR Technical Report and presents the degree to which the MCO addressed each opportunity for improvement. **Section VII** includes a summary of the MCO’s strengths and opportunities for improvement for this review period (MY 2021), as determined by IPRO, and a “report card” of the MCO’s performance as related to the quality indicators (QIs) included in the EQR evaluation for HC BH Quality Performance of the MCO. Lastly, **Section VIII** provides a summary of EQR activities for the MCO for this review period, an appendix that includes crosswalks of PEPS standards to pertinent BBA regulations and to OMHSAS-specific PEPS substandards, as well as results of the PEPS review for OMHSAS-specific standards, followed by a list of literature references cited in this report.

I: Validation of Performance Improvement Projects

Objectives

Title 42 CFR § 438.330(d) establishes that state agencies require contracted MCOs to conduct PIPs that focus on both clinical and non-clinical areas. According to the CMS, the purpose of a PIP is to assess and improve the processes and outcomes of health care provided by an MCO.

In accordance with current BBA regulations, IPRO validates at least one performance improvement project (PIP) for the MCO. Under the existing HC BH agreement with OMHSAS, Primary Contractors, along with the responsible subcontracted entities (i.e., MCOs), are required to conduct a minimum of two focused studies per year. The Primary Contractors and MCOs are required to implement improvement actions and to conduct follow-up, including, but not limited to, subsequent studies or remeasurement of previous studies in order to demonstrate improvement or the need for further action.

CY 2021 saw the initial implementation stage of the new PIP project. During this stage, the PIP project was renamed “Prevention, Early Detection, Treatment, and Recovery (PEDTAR) for Substance Use Disorders” (SUD) in accordance with feedback received by the BH-MCOs and Primary Contractors during the first year of the PIP. The MCOs submitted their recalculated baselines which allowed for any recalibration of their measures and subsequent interventions as needed.

The Aim Statement for this PIP remained: “Significantly slow (and eventually stop) the growth of SUD prevalence among HC members while improving outcomes for those individuals with SUD, and also addressing racial and ethnic health disparities through a systematic and person-centered approach.”

OMHSAS kept three common (for all MCOs) clinical objectives and one non-clinical population health objective:

1. Increase access to appropriate screening, referral, and treatment for members with an Opioid and/or other SUD;
2. Improve retention in treatment for members with an Opioid and/or other SUD diagnosis;
3. Increase concurrent use of Drug & Alcohol counseling in conjunction with Pharmacotherapy (Medication-Assisted Treatment); and
4. Develop a population-based prevention strategy with a minimum of at least two activities across the MCO/HC BH Contracting networks. The two “activities” may fall under a single intervention or may compose two distinct interventions. Note that while the emphasis here is on population-based strategies, this non-clinical objective should be interpreted within the PIP lens to potentially include interventions that target or collaborate with providers and health care systems in support of a specific population (SUD) health objective.

Additionally, OMHSAS identified the following core performance indicators for the PEDTAR PIP:

1. **Follow-Up After High-Intensity Care for Substance Use Disorder (FUI)** – This Healthcare Effectiveness Data and Information Set (HEDIS®) measure measures “the percentage of acute inpatient hospitalizations, residential treatment or detoxification visits for a diagnosis of substance use disorder among members 13 years of age and older that result in a follow-up visit or service for substance use disorder.”³ It contains two submeasures: continuity of care within 7 days, and continuity of care within 30 days of the index discharge or visit.
2. **Substance Use Disorder-Related Avoidable Readmissions (SAR)** – This is a PA-specific measure that measures avoidable readmissions for HC members 13 years of age and older discharged from detox, inpatient rehab, or residential services with an alcohol and other drug dependence (AOD) primary diagnosis. The measure proposes to require 30 days of continuous enrollment (from the index discharge date) in the plan’s HC program. The measure will measure discharges, not individuals (starting from Day 1 of the MY, if multiple qualifying discharges within any 30-day period, only the earliest discharge is counted in the denominator). The SUD avoidable readmissions submeasure is intended here to complement FUI and recognizes that appropriate levels of care for individuals with SUD will depend on the particular circumstances and conditions of the individual. Therefore, for this submeasure, “avoidable readmission” will include detox episodes only.
3. **Mental Health-Related Avoidable Readmissions (MHR)** – This PA-specific measure will use the same denominator as SAR. The measure recognizes the high comorbidity rates of MH conditions among SUD members and is designed to assess screening, detection, early intervention, and treatment for MH conditions before they reach a critical stage. For this measure, “readmission” will be defined as any acute inpatient admission with a primary MH

diagnosis, as defined by the PA-specific FUH measure, occurring within 30 days of a qualifying discharge from AOD detox, inpatient rehab, or residential services.

4. **Medication-Assisted Treatment for Opioid Use Disorder (MAT-OUD)** – This PA-specific performance indicator measures the percentage of HC BH beneficiaries with an active diagnosis of opioid use disorder (OUD) in the measurement period who received both BH counseling services as well as pharmacotherapy for their OUD during the measurement period. This PA-specific measure is based on a CMS measure of “the percentage of Medicaid beneficiaries ages 18–64 with an OUD who filled a prescription for or were administered or dispensed an FDA-approved medication for the disorder during the measure year.”⁴ This measure will be adapted to include members age 16 years and older. BH counseling is not necessarily limited to addiction counseling.
5. **Medication-Assisted Treatment for Alcohol Use Disorder (MAT-AUD)** – This PA-specific performance indicator measures the percentage of HC BH beneficiaries with an active diagnosis of moderate to severe Alcohol Use Disorder (AUD) in the measurement period who received both BH counseling services as well as pharmacotherapy for their AUD during the measurement period. This PA-specific measure mirrors the logic of MAT-OUD, except for members age 16 years and older with severe or moderate AUD. BH counseling is not necessarily limited to addiction counseling.

MCOs are expected to submit results to IPRO on an annual basis. In addition to running as annual measures, quarterly rates will be used to enable measurement on a frequency that will support continuous monitoring and adjustment by the MCOs and their Primary Contractors.

This PIP project will extend from January 2021 through December 2023, with initial PIP proposals submitted in 2020 and a final report due in September 2024. The report marks the 18th EQR review to include validation of PIPs. With this PIP cycle, all MCOs/Primary Contractors share the same baseline period and timeline.

Technical Methods of Data Collection and Analysis

The MCOs are required by OMHSAS to submit their projects using a standardized PIP template form, which is consistent with CMS protocols. These protocols follow a longitudinal format and capture information relating to:

- Project Topic
- Methodology
- Barrier Analysis, Interventions, and Monitoring
- Results
- Discussion

For the PEDTAR PIP, OMHSAS has designated the Primary Contractors to conduct quarterly PIP review calls with each MCO. The purpose of these calls will be to discuss ongoing monitoring of PIP activity, to discuss the status of implementing planned interventions, and to provide a forum for ongoing technical assistance, as necessary. Plans will be asked to provide up-to-date data on process measures and outcome measures prior to each meeting. Because of the level of detail provided during these meetings, rather than two semiannual submissions, MCOs will submit only one PIP interim report each September starting in 2021.

IPRO’s validation of PIP activities is consistent with the protocol issued by CMS⁵ and meets the requirements of the Final Rule on the EQR of Medicaid MCOs. IPRO’s review evaluates each project for compliance with the 8 review elements listed below:

1. Topic Rationale
2. Aim
3. Methodology
4. Identified Study Population Barrier Analysis
5. Robust Interventions
6. Results
7. Discussion and Validity of Reported Improvement
8. Sustainability

The first seven elements relate to the baseline and demonstrable improvement phases of the project. The last element relates to sustaining improvement from the baseline measurement. Each element carries a separate weight. Scoring for each element is based on full, partial, and non-compliance.

Findings

The MCO successfully submitted a PEDTAR PIP proposal in the fall of 2020 based on an initial baseline period of July 1, 2019, through June 30, 2020. Implementation began in early 2021. The MCO subsequently resubmitted a revised proposal based on the full CY 2020 data with goals, objectives, and interventions recalibrated as needed. IPRO reviewed all baseline PIP submissions for adherence to PIP design principles and standards, including alignment with the Statewide PIP aims and objectives as well as internal consistency and completeness. Clinical intervention highlights include improved awareness of SUD treatment resources among minority communities through community speaker meetings, learning collaboratives, warm hand-off incentivization, secret shopper monitoring for timely access to SUD providers, and root cause analysis for providers not delivering evidence-based MAT. For its population-based prevention strategy component, CBH is developing a two-fold vaping education program including a vaping toolkit and expert speaker session to discuss the health impacts of vaping to children and teens in Philadelphia schools and improving provider awareness on vaping through educational sessions on vaping and other provider resources.

II: Validation of Performance Measures

Objectives

In MY 2020, OMHSAS's HealthChoices Quality Program required MCOs to run three performance measures as part of their quality assessment and performance improvement (QAPI) program: the HEDIS Follow-Up After Hospitalization for Mental Illness (FUH), a PA-specific Follow-Up After Hospitalization for Mental Illness, and a PA-specific Readmission Within 30 Days of Inpatient Psychiatric Discharge studies were remeasured in 2020. IPRO validated all three performance measures reported by each MCO for MY 2020 to ensure that the performance measures were implemented to specifications and state reporting requirements (42 C.F.R. § 438.330(b)(2)).

Follow-Up After Hospitalization for Mental Illness

This performance measure assessed the percentage of discharges for members 6 years of age and older who were hospitalized for treatment of selected mental health disorders, who were seen on an ambulatory basis, or who were in day/night treatment with a mental health provider on the date of discharge up to 7 and 30 days after hospital discharge. The measure continues to be of interest to OMHSAS for the purpose of comparing county, Primary Contractor, and BH-MCO rates to available national benchmarks and to prior years' rates.

Measurement year (MY) 2002 was the first year follow-up rates were reported. Quality Indicator (QI) 1 and QI 2 utilize the HEDIS methodology for this measure. The PA-specific indicators were added to include services with high utilization in the HC BH Program that could not be mapped to any of the standard coding used in the HEDIS measure to identify follow-up office visits. Each year, the QI 1 and QI 2 specifications are aligned with the HEDIS Follow-up After Mental Health Hospitalization measure. The PA-specific codes that are not included in the HEDIS measure are also reviewed for accuracy on an annual basis.

Typically, HEDIS FUH undergoes annual updates to its specifications. Among the updates in 2020 (MY 2019), the National Committee for Quality Assurance (NCQA) added the following reporting strata for FUH, ages: 6–17, 18–64, and 65 and over. These changes resulted in a change in the reporting of FUH results in this report, which are broken out by ages: 6–17, 18–64, and 6 and over (All Ages).

Measure Selection and Description

In accordance with DHS guidelines, IPRO created the indicator specifications to resemble HEDIS specifications. For each indicator, the criteria specified to identify the eligible population were: product line, age, enrollment, anchor date, and event/diagnosis. To identify the administrative numerator positives, date of service and diagnosis/procedure code criteria were outlined, as well as other specifications as needed. Indicator rates were calculated using only the BH-MCO's data systems to identify numerator positives (i.e., administratively).

This PM assessed the percentage of discharges for members 6 years of age and older who were hospitalized for treatment of selected mental health disorders, who were seen on an ambulatory basis, or who were in day/night treatment with a mental health provider on the date of discharge up to 7 and 30 days after hospital discharge.

There were four separate measurements related to Follow-Up After Hospitalization. All utilized the same denominator but had different numerators.

Eligible Population for HEDIS Follow-Up

The entire eligible population was used for all 25 Primary Contractors participating in the MY 2020 study. Eligible cases were defined as those members in the HC BH Program who met the following criteria:

- Members who had one (or more) hospital discharges from any acute care facility with a discharge date occurring between January 1 and December 1, 2020;
- A principal ICD-9- or ICD-10-CM diagnosis code indicating one of the specified mental health disorders;
- Six (6) years old and over as of the date of discharge; and
- Continuously enrolled from the date of hospital discharge through 30 days after discharge, with no gaps in enrollment.

Members with multiple discharges on or before December 1, 2020, greater than 30 days apart, with a principal diagnosis indicating one of the mental health disorders specified are counted more than once in the eligible population. If a readmission or direct transfer followed a discharge for one of the selected mental health disorders to an acute mental health facility within 30 days after discharge, only the subsequent discharge is counted in the denominator, as long as the subsequent discharge is on or before December 1, 2020. The methodology for identification of the eligible population for these indicators was consistent with the HEDIS MY 2020 methodology for the Follow-Up After Hospitalization for Mental Illness measure.

HEDIS Follow-Up Indicators

Quality Indicator 1 (QI 1): Follow-Up After Hospitalization for Mental Illness Within 7 Days After Discharge (calculation based on industry standard codes used in HEDIS)

Numerator: An ambulatory visit with a mental health practitioner up to 7 days after hospital discharge with one of the qualifying industry standard ambulatory service codes. The date of service must clearly indicate a qualifying ambulatory visit with a mental health practitioner or day/night treatment with a mental health practitioner.

Quality Indicator 2 (QI 2): Follow-up After Hospitalization for Mental Illness Within 30 Days After Discharge (calculation based on industry standard codes used in HEDIS)

Numerator: An ambulatory visit with a mental health practitioner up to 30 days after hospital discharge with one of the qualifying industry standard ambulatory service codes. The date of service must clearly indicate a qualifying ambulatory visit with a mental health practitioner or day/night treatment with a mental health practitioner.

Eligible Population for PA-Specific Follow-Up

The entire eligible population was used for all 25 Primary Contractors participating in the MY 2020 study. Eligible cases were defined as those members in the HC BH Program who met the following criteria:

- Members who had one (or more) hospital discharges from any acute care facility with a principal diagnosis of mental illness occurring between January 1 and December 2, 2020;
- Six (6) years old and over as of the date of discharge; and
- Continuously enrolled from the date of hospital discharge through 30 days after discharge, with no gaps in enrollment.

Members with multiple discharges on or before December 2, 2020, greater than 30 days apart, with a principal diagnosis indicating one of the mental health disorders specified are counted more than once in the eligible population. If a readmission or direct transfer followed a discharge for one of the selected mental health disorders to an acute mental health facility within 30 days after discharge, only the subsequent discharge is counted in the denominator, as long as the subsequent discharge is on or before December 2, 2020. The PA-specific measure has been adjusted to allow discharges up through December 2, 2020, which allows for the full 30-day follow-up period where same-day follow-up visits may be counted in the numerator.

PA-Specific Follow-Up Indicators

Quality Indicator A (QI A): Follow-Up After Hospitalization for Mental Illness Within 7 Days After Discharge (calculation based on numerator 1 codes and additional PA-specific codes not used in HEDIS)

Numerator: An ambulatory visit with a mental health practitioner or peer support network on the date of discharge or up to 7 days after hospital discharge with one of the qualifying industry standard or one of the PA-specific ambulatory service codes provided. The date of service must clearly indicate a qualifying ambulatory visit with a mental health practitioner or day/night treatment with a mental health practitioner.

Quality Indicator B (QI B): Follow-Up After Hospitalization for Mental Illness Within 30 Days after Discharge (calculation based on numerator 1 codes and additional PA-specific codes not used in HEDIS)

Numerator: An ambulatory visit with a mental health practitioner or peer support network on the date of discharge or up to 30 days after hospital discharge with one of the qualifying industry standard or one of the PA-specific ambulatory service codes provided. The date of service must clearly indicate a qualifying ambulatory visit with a mental health practitioner or day/night treatment with a mental health practitioner.

Quality Indicator Significance

Mental health disorders also contribute to excess mortality from suicide, one of the leading preventable causes of death in the United States. In 2019, an estimated 47.6 million adults aged 18 or older (19.1%) had any mental illness in the past year, while an estimated 11.4 million adults in the nation had serious mental illness in the past year, which corresponds to 4.6% of all U.S. adults.⁶ Additionally, patients with schizophrenia or bipolar disorder have elevated rates of preventable medical comorbidities such as obesity, cardiovascular diseases, and diabetes, partly attributed to the epidemiology of the disorder, antipsychotic prescription patterns, reduced use of preventive services, and substandard medical care that they receive.⁷ Roughly one-third of adults with serious persistent mental illness (SPMI) in any given year did not receive any mental health services, showing a disparity among those with SPMI.⁸ Further research suggests that more than half of those with SPMI did not receive services because they could not afford the cost of care.⁹ Cost of care broke down as follows: 60.8% of patients' related expenses were attributed to loss of earnings, 31.5% were attributed to healthcare expenses, while 7.7% were attributed to payments for disability benefits.¹⁰ For these reasons, timely and appropriate treatment for mental illnesses is essential.

It has long been recognized that continuity of care is critical to positive outcome and to prevent long-term deterioration in people with severe and persistent mental illness.¹¹ As noted in *The State of Health Care Quality Report*,¹² appropriate treatment and follow-up care can reduce the duration of disability from mental illnesses and the likelihood of recurrence. An outpatient visit within at least 30 days (ideally, 7 days) of discharge ensures that the patient's transition to home and/or work is supported and that gains made during hospitalization are maintained. These types of contacts specifically allow physicians to ensure medication effectiveness and compliance and to identify complications early on in order to avoid more inappropriate and costly use of hospitals and emergency departments.¹³ With the expansion of evidence-based practice in the recent decade, continuity has become a core principle in care delivery and in performance measurement for mental health services.¹⁴ One way to improve continuity of care is to provide greater readiness of aftercare by shortening the time between discharge from the hospital and the first day of outpatient contact.¹⁵

The difficulty in engaging psychiatric patients after inpatient hospitalization, however, has been a long-standing concern of behavioral health care systems, with some researchers having estimated that 40–60% of patients fail to connect with an outpatient clinician.¹⁶ Over the course of a year, patients who have kept appointments have been shown to have a decreased chance of being re-hospitalized than those who do not follow up with outpatient care.¹⁷

There are various measures of treatment efficacy, such as service satisfaction, functional status, and health outcomes. Among them, rehospitalization rates continue to be used as a reliable indicator of the effectiveness of inpatient treatment.¹⁸ Inpatient readmission is clearly a step backward in treatment and a costly alternative to effective and efficient ambulatory care. Timely follow-up care, therefore, is an important component of comprehensive care and is an effective means to control the cost and maximize the quality of mental health services. Additionally, mental illness continues to impact the PA population, including those with substance abuse concerns or substance use disorder (SUD).¹⁹ Measuring appropriate care transitions for members with mental illness therefore carries wider implications for the OMHSAS quality area related to SUD prevalence and outcomes.

As noted, timely follow-up after hospitalization for mental illness has been and remains a focus for OMHSAS, and results are reviewed for potential trends each year. MY 2020 results will be examined in the context of the COVID-19 pandemic, which has been implicated in rising prevalence of mental illness.²⁰ While factors such as those outlined in this section may persist and continue to impact follow-up rates, OMHSAS is exploring new and related areas of research as well as the factors that may impact optimal follow-up. OMHSAS will continue to discuss the development of new or enhanced initiatives with the goal of continual improvement of care.

Readmission Within 30 Days of Inpatient Psychiatric Discharge

In addition to Follow-Up After Hospitalization for Mental Illness, OMHSAS elected to retain and remeasure the Readmission Within 30 Days of Inpatient Psychiatric Discharge indicator for this year's EQR. As directed by OMHSAS, IPRO developed the PM for implementation in 2008. Although initiated in 2008, OMHSAS requested that the first study in this area be focused on MY 2006 data. OMHSAS required the BH-MCOs to perform another data collection and remeasurement of the PM for validation soon thereafter for MY 2007, and then for MY 2008. Remeasurements were

conducted in 2010, 2011, and 2012 on MY 2009, 2010, and 2011 data, respectively. The MY 2020 study conducted in 2021 was the 12th remeasurement of this indicator. Four clarifications were made to the specifications for MY 2013. If a member was known to have multiple member IDs in the measurement year, BH-MCOs were required to combine the eligibility and claims data into a single ID prior to producing the data. BH-MCOs were reminded that denied claims must be included in this measure, and that they must use the original procedure and revenue code submitted on the claim. Finally, clarification was issued on how to distinguish between a same-day readmission and a transfer to another acute facility. As with the Follow-Up After Hospitalization for Mental Illness measure, the rate provided are aggregated at the HC BH (Statewide) level for MY 2020. This measure continued to be of interest to OMHSAS for the purposes of comparing Primary Contractor and BH-MCO rates to the OMHSAS performance goal and to prior rates.

This study examined behavioral health services provided to members participating in the HC BH Program. For the indicator, the criteria specified to identify the eligible population were product line, age, enrollment, anchor date, and event/diagnosis. In order to identify the administrative numerator-positives, the date-of-service, and diagnosis/procedure code criteria were outlined, as well as were other specifications as needed. This measure's calculation was based on administrative data only.

This PM assessed the percentage of discharges for enrollees from inpatient acute psychiatric care that were followed by an inpatient acute psychiatric care readmission within 30 days of the previous discharge.

Eligible Population

The entire eligible population was used for all 67 counties and 25 Primary Contractors participating in the MY 2020 study. Eligible cases were defined as those members in the HC BH Program who met the following criteria:

- Members with one or more hospital discharges from any inpatient acute psychiatric care facility with a discharge date occurring between January 1 and December 2, 2020;
- A principal ICD-9- or ICD-10-CM diagnosis code indicating one of the specified mental health disorders;
- Enrolled on date of discharge from the first hospitalization event and on the date of admission of the second discharge event; and
- The claim was clearly identified as a discharge.

The numerator comprised members who were readmitted to inpatient acute psychiatric care within 30 days of the previous inpatient psychiatric discharge. One significant change to this specification is the extension of the end date for discharges from December 1st to December 2nd to accommodate the full 30 days before the end of the measurement year.

Technical Methods of Data Collection and Analysis

A cross-sectional quality improvement study design was employed. The source for all information was administrative data provided to IPRO by the BH-MCOs for each Primary Contractor participating in the current study. The source for all administrative data was the BH-MCOs' transactional claims systems. Each BH-MCO was also required to submit the follow-up rates calculated for the four indicators, along with their data files for validation purposes. The BH-MCOs were given the opportunity for resubmission, as necessary.

Performance Goals

At the conclusion of the validation process for MY 2011, OMHSAS began re-examination of the benchmarks. This discussion was based on several years of performance data from this measure, as well as the comparisons to the HEDIS percentiles. As a result of this discussion, OMHSAS adopted HEDIS percentiles as the goals for the HEDIS follow-up indicators. In 2020 (MY 2019), in part to better account for the growing population of members 65 years old and older, OMHSAS changed its benchmarking to the FUH All Ages (6+ years old) measure. OMHSAS established a 3-year goal for the State to meet or exceed the 75th percentile for the All Ages measure, based on the annual HEDIS Quality Compass® published percentiles for 7-day and 30-day FUH. This change in 2020 also coincided with a more proactive approach to goal-setting. BH-MCOs were given interim goals for MY 2020 for both the 7-day and 30-day FUH All Ages rates based on their MY 2019 results. These MY 2019 results were reported in the 2020 BBA report.

HEDIS percentiles for the 7-day and 30-day FUH All-Ages indicators have been adopted as the benchmarks for determining the requirement for a root cause analysis (RCA) and corresponding quality improvement plan (QIP) for each

underperforming indicator. Rates for the HEDIS FUH 7-day and 30-day indicators that fall below the 75th percentile for each of these respective indicators will result in a request to the BH-MCO for an RCA and QIP. This process is further discussed in **Section VI**.

For REA, OMHSAS designated the PM goal as better than (i.e., less than) or equal to 10.0% for the participating BH-MCOs and contractors. For this measure, lower rates indicate better performance.

Although not part of this report, OMHSAS sponsored in 2020 the rollout of an IPRO-hosted Tableau® server reporting platform, which allows users, including BH-MCOs and Primary Contractors, to interactively query data and produce reports on PMs. These reports include statistical or non-statistical summaries and comparisons of rates by various stratifications, including by demographics, such as race and ethnicity, as well as by participation status in the Medicaid Expansion program (Pennsylvania continued its Medicaid expansion under the Affordable Care Act in 2020). This interactive reporting provides an important tool for BH-MCOs and their HC Oversight Entities to set performance goals as well monitor progress toward those goals.

Data Analysis

The quality indicators were defined as rates, based on a numerator of qualifying events or members, and a denominator of qualifying events or members, defined according to the specifications of the measure. The HC Aggregate (Statewide) for each indicator was the total numerator divided by the total denominator, which represented the rate derived for the Statewide population of denominator-qualifying events or members. Year-to-year comparisons to MY 2019 rates were provided where applicable. Additionally, as appropriate, disparate rates were calculated for various categories in the current study. To compare rates, a Z statistic for comparing proportions for two independent samples was used. To calculate the test statistic, the two proportions were averaged (“pooled”) through the following formula:

$$\hat{p} = \frac{N1 + N2}{D1 + D2}$$

Where:

- N1 = Current year (MY 2020) numerator,
- N2 = Prior year (MY 2019) numerator,
- D1 = Current year (MY 2020) denominator, and
- D2 = Prior year (MY 2019) denominator.

The single proportion estimate was then used for estimating the standard error (SE). Z-test statistic was obtained by dividing the difference between the proportions by the standard error of the difference. Analysis that uses the Z test assumes that the data and their test statistics approximate a normal distribution. To correct for approximation error, the Yates correction for continuity was applied:

$$z - statistic = \frac{ABS(p1 - p2) - 0.5(\frac{1}{D1} + \frac{1}{D2})}{\sqrt{\hat{p}(1 - \hat{p})[\frac{1}{D1} + \frac{1}{D2}]}}$$

Where:

- p1 = Current year (MY 2020) quality indicator rate, and
- p2 = Prior year (MY 2019) quality indicator rate.

Two-tailed statistical significance tests were conducted at $p = 0.05$ to test the null hypothesis of:

$$H_0: p1 = p2$$

Percentage point difference (PPD) as well as 95% confidence intervals for difference between the two proportions were also calculated. Confidence intervals were not calculated if denominators of rates contained fewer than 100 members.

Limitations

The tables and figures in this section present rates, confidence intervals, and tests of statistical significance for Primary Contractors. Caution should be exercised when interpreting results for small denominators. A denominator of 100 or greater is preferred for drawing conclusions from z-score tests of the PM results. In addition, the above analysis assumes that the proportions being compared come from independent samples. To the extent that this is not the case, the findings should be interpreted with caution.

Conclusions and Comparative Findings

The HEDIS follow-up indicators are presented for three age groups: ages 18 to 64, ages 6 and older, and ages 6 to 17. The 6+ years old (“All Ages”) results are presented to show the follow-up rates for the overall HEDIS population, and the 6 to 17 years old age group results are presented to support the Children's Health Insurance Program Reauthorization Act (CHIPRA) reporting requirements. The results for the PA-specific follow-up indicators are presented for ages 6+ years old only.

The results are presented at the BH-MCO and Primary Contractor level. The BH-MCO-specific rates were calculated using the numerator (N) and denominator (D) for that particular BH-MCO (and Primary Contractor with the same contracted BH-MCO). The Primary Contractor-specific rates were calculated using the numerators and denominators for that particular Primary Contractor. For each of these rates, the 95% confidence interval (CI) is reported. The HC BH Aggregate (Statewide) rates were also calculated for the indicators.

BH-MCO-specific rates were compared to the HC BH Statewide rates to determine if they were statistically significantly above or below that value. Statistically significant BH-MCO differences are noted. Primary Contractor-specific rates were also compared to the HC BH Statewide rates to determine if they were statistically significantly above or below that value. Statistically significant Primary Contractor-specific differences are noted.

The HEDIS follow-up results for the All-Ages groups and 18-64 years old age group are compared to the HEDIS 2020 national percentiles to show BH-MCO and Primary Contractor progress with meeting the OMHSAS goal of follow-up rates at or above the 75th percentile. The HEDIS follow-up results for the 6 to 17 years old age group are not compared to HEDIS benchmarks.

I: HEDIS Follow-Up Indicators

(a) Age Group: 18–64 Years Old

Table 2.1 shows the MY 2020 results for both the HEDIS 7-day and 30-day follow-up measures for members aged 18 to 64 years old compared to MY 2019.

Table 2.1: MY 2020 HEDIS FUH 7- and 30-Day Follow-Up Indicators (18–64 Years)

Measure	MY 2020					MY 2019 %	MY 2020 Rate Comparison		
	(N)	(D)	%	95% CI			to MY 2019		to MY 2020 HEDIS Medicaid Percentiles
				Lower	Upper		PPD ¹	SSD	
QI1 - HEDIS FUH 7-Day Follow-up (18-64 Years)									
Statewide	10454	28699	36.4%	35.9%	37.0%	35.9%	0.5	NO	Below 75th Percentile, Above 50th Percentile
CBH	1054	5231	20.1%	19.1%	21.2%	23.0%	-2.8	YES	Below 25th Percentile
Philadelphia	1054	5231	20.1%	19.1%	21.2%	23.0%	-2.8	YES	Below 25th Percentile
QI2 - HEDIS FUH 30-Day Follow-up (18-64 Years)									
Statewide	15978	28699	55.7%	55.1%	56.3%	55.8%	-0.1	NO	Below 75th Percentile, Above 50th Percentile
CBH	1818	5231	34.8%	33.5%	36.1%	37.6%	-2.8	YES	Below 25th Percentile
Philadelphia	1818	5231	34.8%	33.5%	36.1%	37.6%	-2.8	YES	Below 25th Percentile

¹ Due to rounding, a PPD value may slightly diverge from the difference between the MY 2020 and MY 2019 rates.

MY: measurement year; HEDIS: Healthcare Effectiveness Data and Information Set; FUH: Follow-Up After Hospitalization; CI: confidence interval; N: numerator; D: denominator; PPD: percentage point difference; SSD: statistically significant difference; CBH: Community Behavioral Health.

For MY 2020, CBH was subcontracted to provide BH services to only one county located in the Southeast region of the Commonwealth – Philadelphia County; therefore, the CBH performance alone provides the BH-MCO performance for Philadelphia County.

Figure 2.1 is a graphical representation of the MY 2020 HEDIS FUH 7- and 30-day follow-up rates in the 18 to 64 years old population for CBH and its associated Primary Contractor. The orange line represents the MCO average.

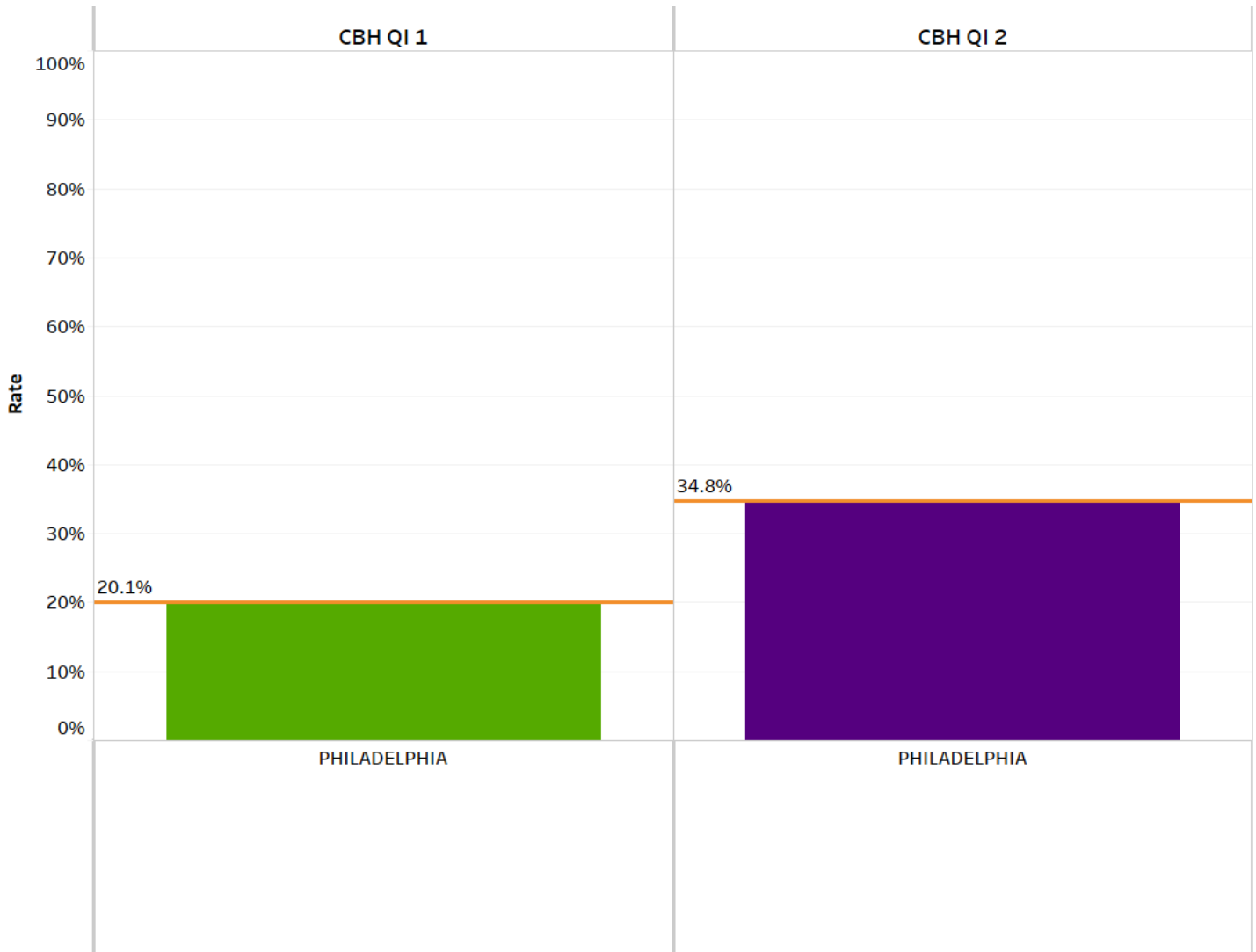


Figure 2.1: MY 2020 HEDIS FUH 7- and 30-Day Follow-Up Rates (18–64 Years).

Figure 2.2 shows the HC BH (Statewide) rates and the individual Primary Contractor rates for this age band that were statistically significantly higher (blue) or lower (red) than the statewide benchmark.

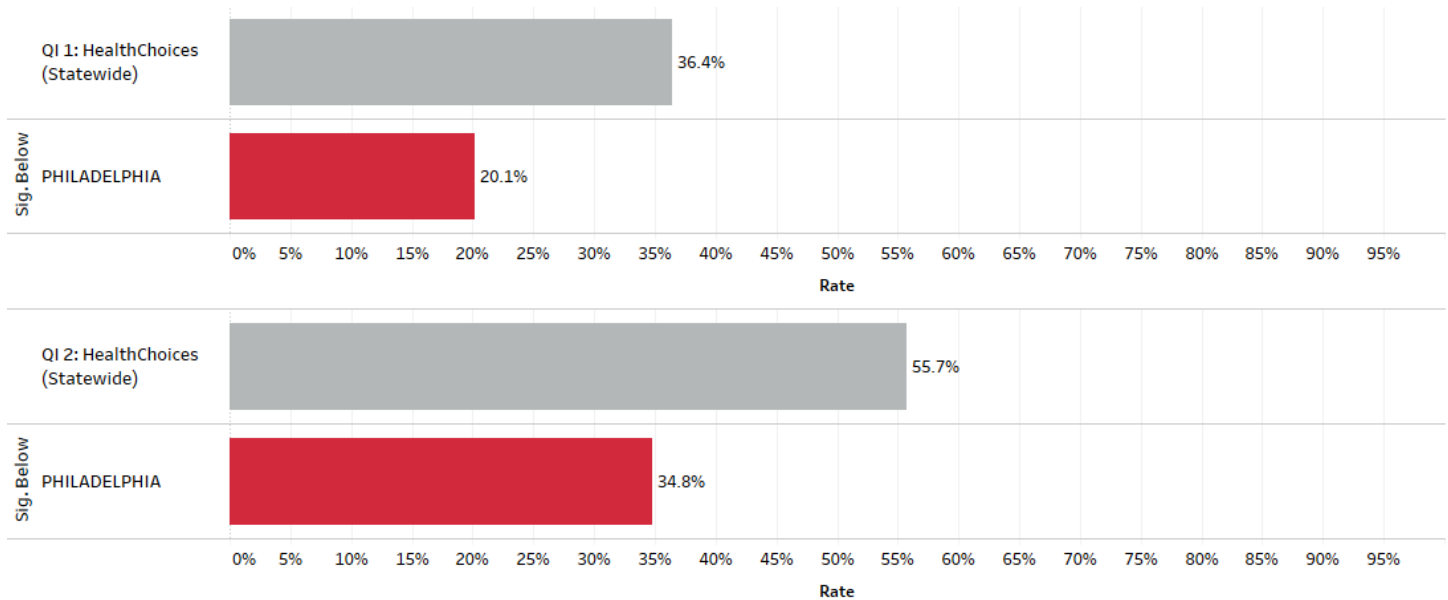


Figure 2.2: Statistically Significant Differences in CBH Contractor MY 2020 HEDIS FUH Rates (18–64 Years). CBH contractor MY 2020 HEDIS FUH rates for 18–64 years of age that are significantly different than HC BH (Statewide) MY 2020 HEDIS FUH rates (18–64 years).

(b) Overall Population: 6+ Years Old

The MY 2020 HC Aggregate HEDIS and CBH are shown in **Table 2.2**.

Table 2.2: MY 2020 HEDIS FUH 7- and 30-Day Follow-Up Indicators (All Ages)

Measure	MY 2020			MY 2020 Rate Comparison					
	(N)	(D)	%	95% CI		MY 2019 %	to MY 2019		to MY 2020 HEDIS Medicaid Percentiles
				Lower	Upper		PPD ¹	SSD	
Q1 - HEDIS FUH 7-Day Follow-up (Overall)									
Statewide	14501	36459	39.8%	39.3%	40.3%	39.8%	-0.0	NO	Below 75th Percentile, Above 50th Percentile
CBH	1454	6286	23.1%	22.1%	24.2%	27.0%	-3.9	YES	Below 25th Percentile
Philadelphia	1454	6286	23.1%	22.1%	24.2%	27.0%	-3.9	YES	Below 25th Percentile
Q2 - HEDIS FUH 30-Day Follow-up (Overall)									
Statewide	21673	36459	59.4%	58.9%	60.0%	60.3%	-0.9	YES	Below 50th Percentile, Above 25th Percentile
CBH	2390	6286	38.0%	36.8%	39.2%	41.9%	-3.9	YES	Below 25th Percentile
Philadelphia	2390	6286	38.0%	36.8%	39.2%	41.9%	-3.9	YES	Below 25th Percentile

¹ Due to rounding, a PPD value may slightly diverge from the difference between the MY 2020 and MY 2019 rates.

MY: measurement year; HEDIS: Healthcare Effectiveness Data and Information Set; FUH: Follow-Up After Hospitalization; CI: confidence interval; N: numerator; D: denominator; PPD: percentage point difference; SSD: statistically significant difference; CBH: Community Behavioral Health.

Figure 2.3 is a graphical representation of the MY 2020 HEDIS follow-up rates in the overall population for CBH and its associated Primary Contractor. The orange line represents the MCO average.

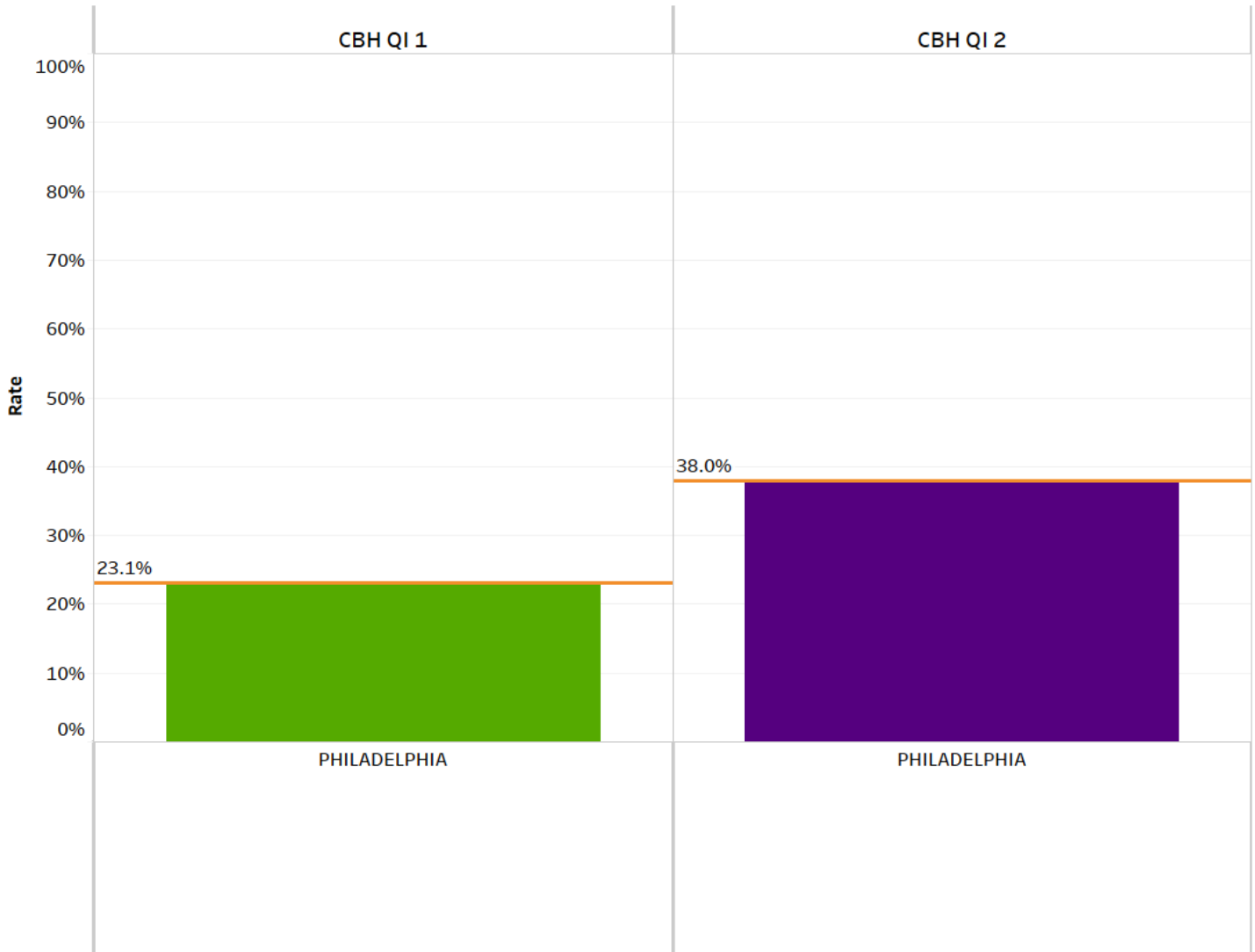


Figure 2.3: MY 2020 HEDIS FUH 7- and 30-Day Follow-Up Rates (All Ages).

Figure 2.4 shows the HC BH (Statewide) rates and the individual Primary Contractor rates that were statistically significantly higher (blue) or lower (red) than the statewide benchmark.

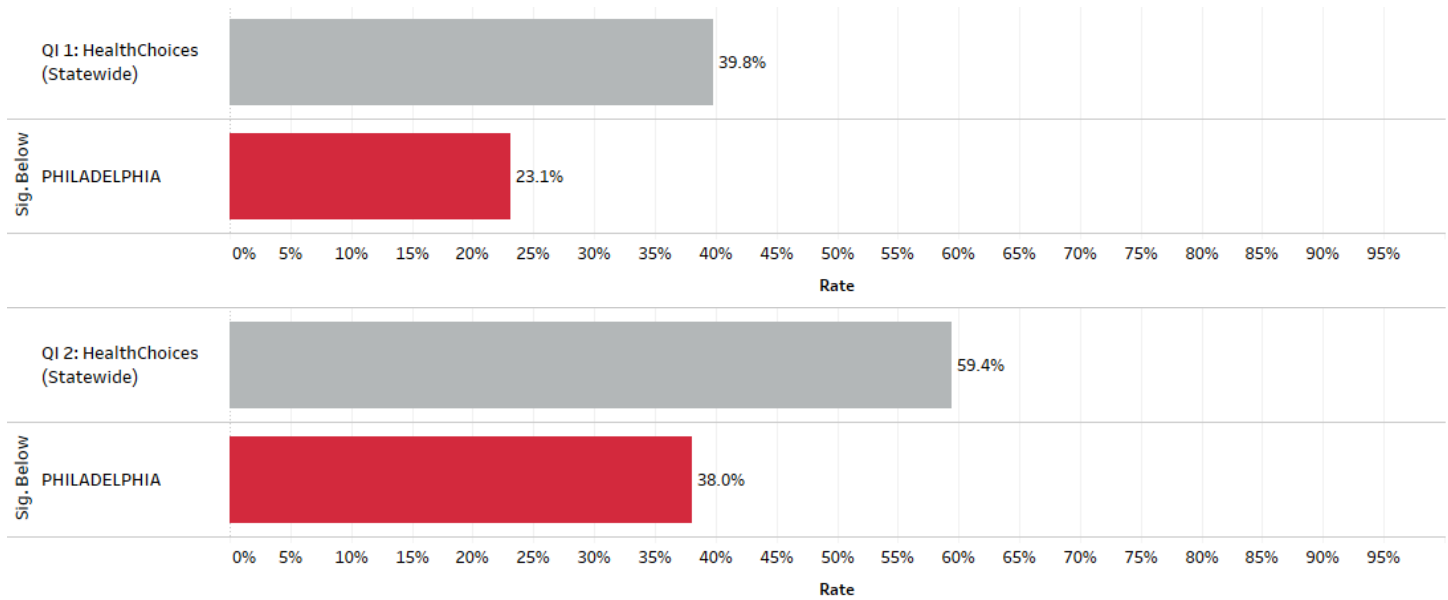


Figure 2.4: Statistically Significant Differences in CBH MY 2020 HEDIS FUH Rates (All Ages) CBH MY 2020 HEDIS FUH rates for all ages that are significantly different than HC BH (statewide) MY 2020 HEDIS FUH rates (all ages).

(c) Age Group: 6–17 Years Old

Table 2.3 shows the MY 2020 results for both the HEDIS 7-day and 30-day follow-up measures for members aged 6–17 years compared to MY 2019.

Table 2.3: MY 2020 HEDIS FUH 7- and 30-Day Follow-Up Indicators (6-17 Years)

Measure	MY 2020					MY 2019 %	MY 2020 Rate Comparison to MY 2019	
	(N)	(D)	%	95% CI			PPD ¹	SSD
				Lower	Upper			
Q1 - HEDIS FUH 7-Day Follow-up (6-17 Years)								
Statewide	3860	6993	55.2%	54.0%	56.4%	55.4%	-0.2	NO
CBH	379	893	42.4%	39.1%	45.7%	51.2%	-8.8	YES
Philadelphia	379	893	42.4%	39.1%	45.7%	51.2%	-8.8	YES
Q2 - HEDIS FUH 30-Day Follow-up (6-17 Years)								
Statewide	5393	6993	77.1%	76.1%	78.1%	78.8%	-1.7	YES
CBH	547	893	61.3%	58.0%	64.5%	69.0%	-7.8	YES
Philadelphia	547	893	61.3%	58.0%	64.5%	69.0%	-7.8	YES

¹ Due to rounding, a PPD value may slightly diverge from the difference between the MY 2020 and MY 2019 rates.

MY: measurement year; HEDIS: Healthcare Effectiveness Data and Information Set; FUH: Follow-Up After Hospitalization; CI: confidence interval; N: numerator; D: denominator; PPD: Percentage point difference; SSD: statistically significant difference; CBH: Community Behavioral Health.

Figure 2.5 is a graphical representation of the MY 2020 HEDIS follow-up rates in the 6 to 17 years old population for CBH and its associated Primary Contractor. The orange line represents the MCO average.

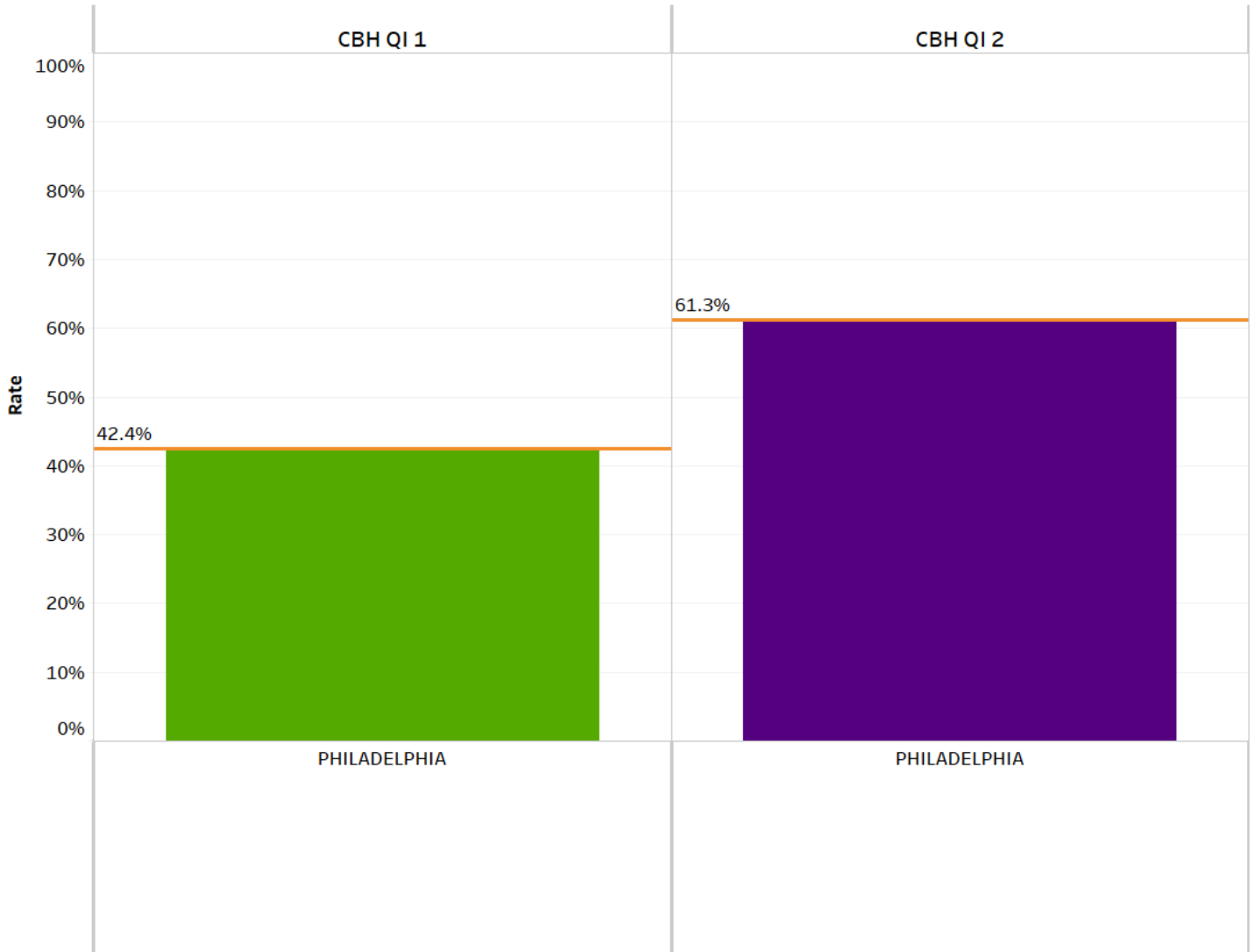


Figure 2.5: MY 2020 HEDIS FUH 7- and 30-Day Follow-Up Rates (6–17 Years).

Figure 2.6 shows the HC BH (Statewide) rates and the individual Primary Contractor rates for this age band that were statistically significantly higher (blue) or lower (red) than the statewide benchmark.

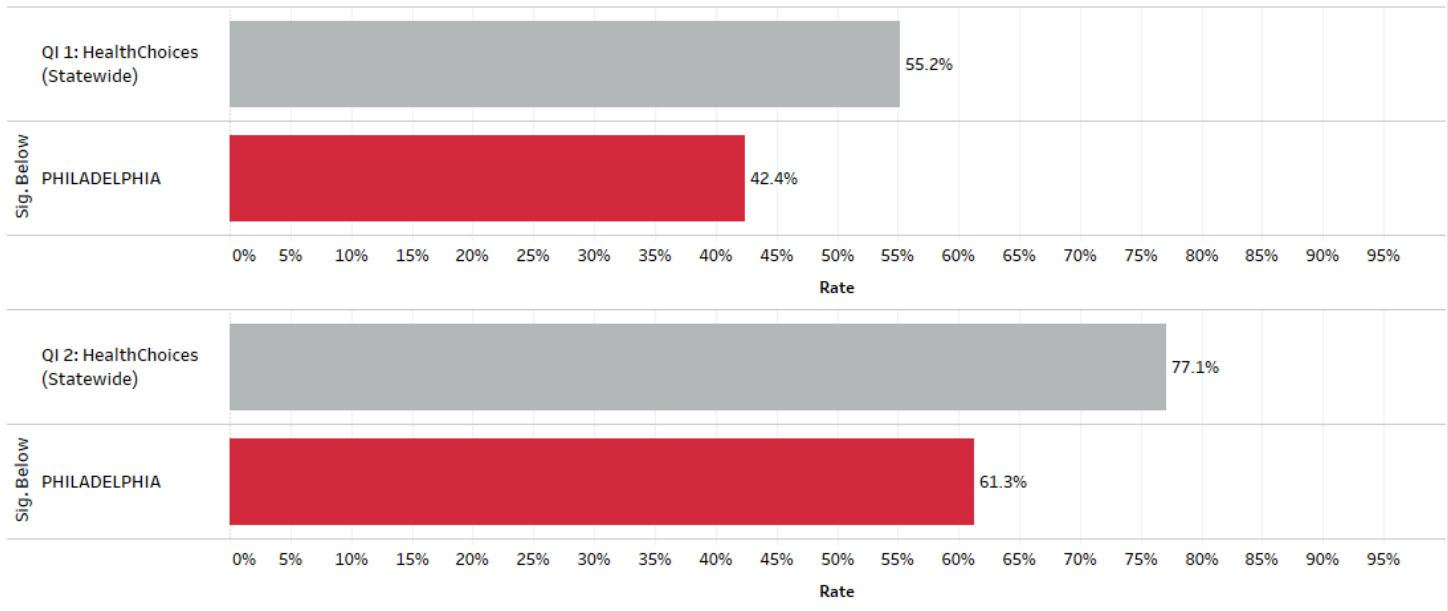


Figure 2.6: Statistically Significant Differences in CBH MY 2020 HEDIS FUH Rates (6–17 Years). CBH MY 2020 HEDIS FUH rates for 6–17 years of age that are significantly different than HC BH (statewide) MY 2020 HEDIS FUH rates (6–17 years).

II: PA-Specific Follow-Up Indicators

(a) Overall Population: 6+ Years Old

Table 2.4 shows the MY 2020 PA-specific FUH 7- and 30-day follow-up indicators for all ages compared to MY 2019.

Table 2.4: MY 2020 PA-Specific FUH 7- and 30-Day Follow-Up Indicators (All Ages)

Measure	MY 2020					MY 2019 %	MY 2020 Rate Comparison to MY 2019	
	(N)	(D)	%	95% CI			PPD ¹	SSD
				Lower	Upper			
QI A - PA-Specific FUH 7-Day Follow-up (Overall)								
Statewide	19124	36580	52.3%	51.8%	52.8%	52.9%	-0.6	NO
CBH	2658	6326	42.0%	40.8%	43.2%	47.3%	-5.2	YES
Philadelphia	2658	6326	42.0%	40.8%	43.2%	47.3%	-5.2	YES
QI B - PA-Specific FUH 30-Day Follow-up (Overall)								
Statewide	24982	36580	68.3%	67.8%	68.8%	69.5%	-1.2	YES
CBH	3595	6326	56.8%	55.6%	58.1%	61.3%	-4.5	YES
Philadelphia	3595	6326	56.8%	55.6%	58.1%	61.3%	-4.5	YES

¹Due to rounding, a PPD value may slightly diverge from the difference between the MY 2020 and MY 2019 rates.

MY: measurement year; FUH: Follow-Up After Hospitalization; CI: confidence interval; N: numerator; D: denominator; PPD: percentage point difference; SSD: statistically significant difference; CBH: Community Behavioral Health.

Figure 2.7 is a graphical representation of the MY 2020 PA-Specific follow-up rates in the overall population for CBH and its associated Primary Contractor. The orange line represents the MCO average.

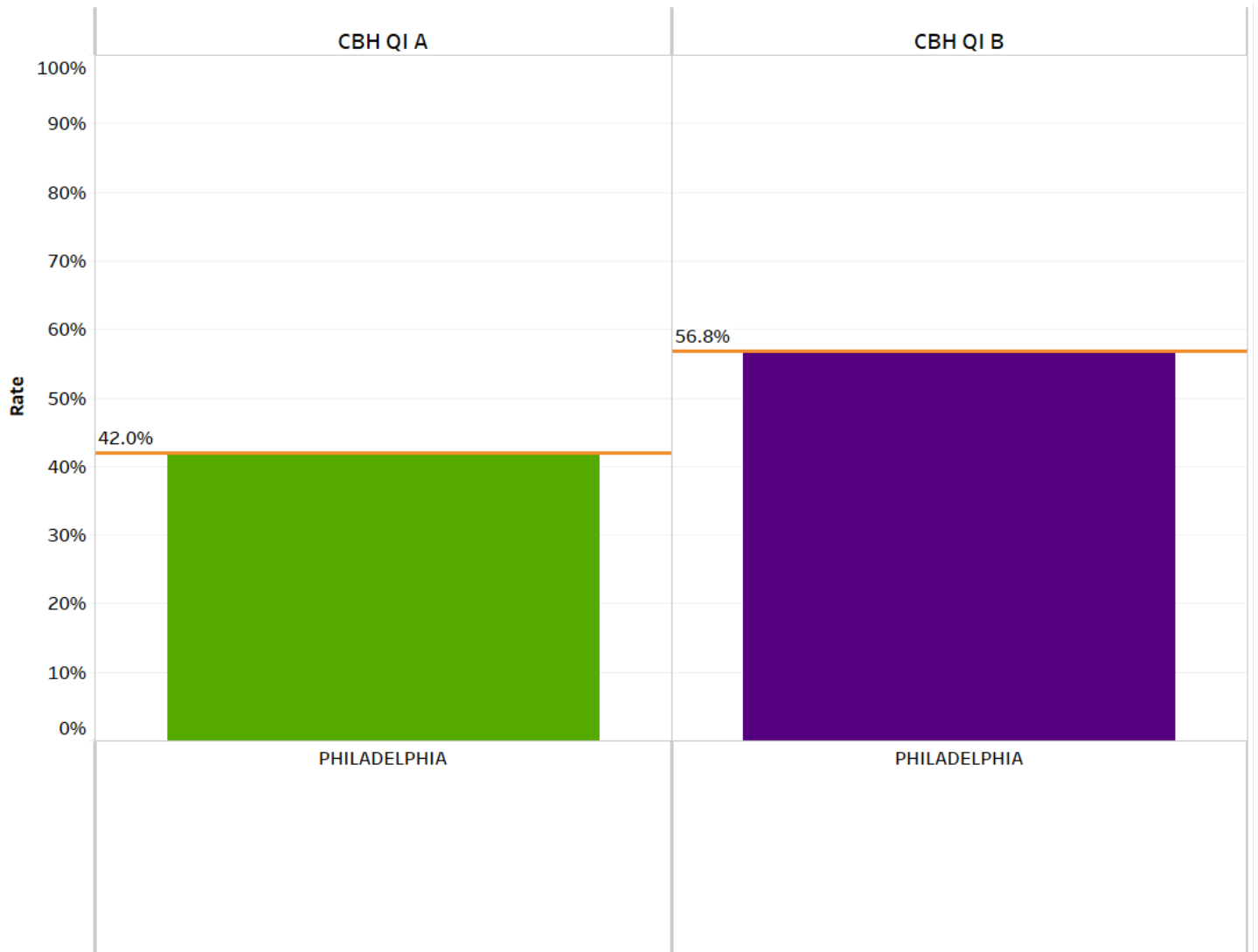


Figure 2.7: MY 2020 PA-Specific FUH 7- and 30-Day Follow-Up Rates (All Ages).

Figure 2.8 shows the HC BH (Statewide) rates and the individual Primary Contractor rates that were statistically significantly higher (blue) or lower (red) than the statewide benchmark.

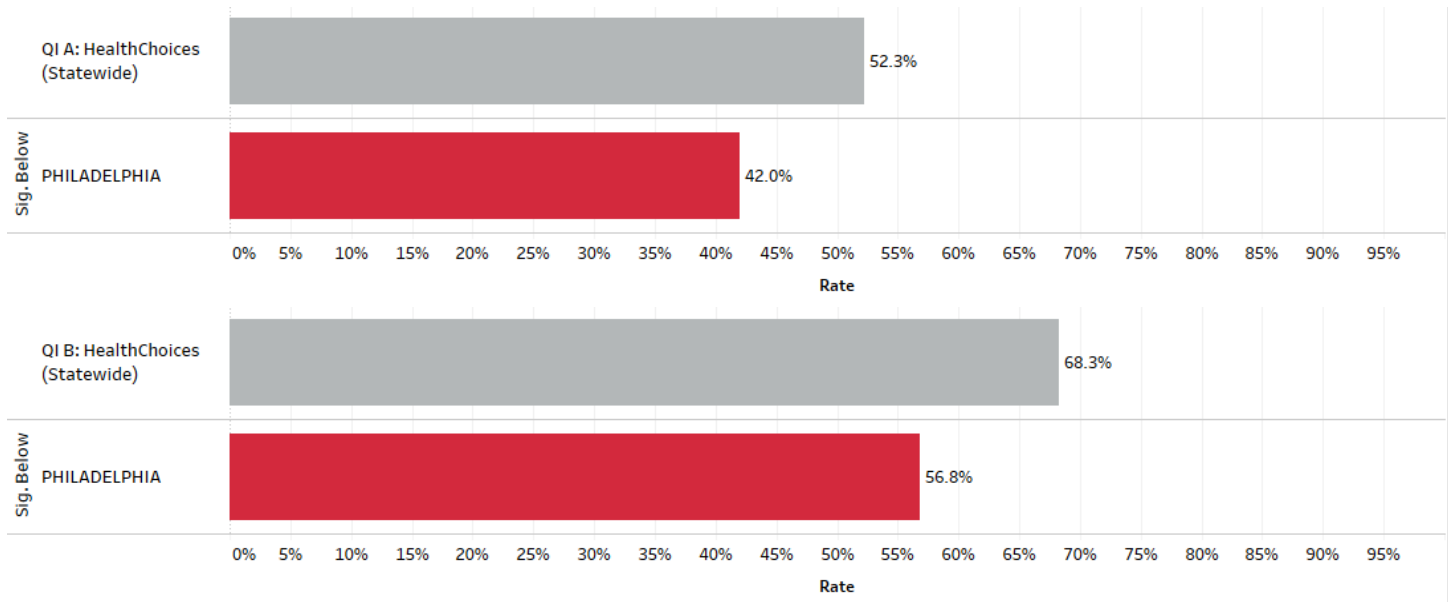


Figure 2.8: Statistically Significant Differences in CBH MY 2020 PA-Specific FUH Rates (All Ages) CBH MY 2020 PA-specific FUH rates for all ages that are significantly different than HC BH (statewide) MY 2020 PA-specific FUH rates (all ages).

III. Readmission Indicators

The results are presented at the BH-MCO and then Primary Contractor level. Year-to-year comparisons of MY 2020 to MY 2019 data are provided. Additionally, as appropriate, disparate rates were calculated for various categories in the current study. The significance of the difference between two independent proportions was determined by calculating the Z score. Statistically significant difference (SSD) at the 0.05 level between groups is noted, as well as the percentage point difference (PPD) between the rates.

Individual rates were also compared to the categorical average. Rates statistically significantly above or below the average are indicated.

Lastly, aggregate rates were compared to the OMHSAS-designated PM goal of 10.0%. Individual BH-MCO and Primary Contractor rates are *not* required to be statistically significantly below 10.0% in order to meet the PM goal (**Table 2.5**).

Table 2.5: MY 2020 REA Readmission Indicators

Measure ¹	MY 2020			MY 2020 Rate Comparison to MY 2019				
	(N)	(D)	%	95% CI		MY 2019 %	PPD ²	SSD
				Lower	Upper			
Inpatient Readmission								
Statewide	6134	45174	13.6%	13.3%	13.9%	13.5%	0.1	NO
CBH	1188	8112	14.6%	13.9%	15.4%	13.8%	0.9	NO
Philadelphia	1188	8112	14.6%	13.9%	15.4%	13.8%	0.9	NO

¹The OMHSAS-designated PM goal is a readmission rate at or below 10%.

²Due to rounding, a PPD value may slightly diverge from the difference between the MY 2020 and MY 2019 rates.

MY: measurement year; REA: Readmission within 30 Days of Inpatient Psychiatric Discharge; CI: confidence interval; N: numerator; D: denominator; PPD: percentage point difference; SSD: statistically significant difference; CBH: Community Behavioral Health.

Figure 2.9 is a graphical representation of the MY 2020 readmission rates for CBH and its associated Primary Contractor. The orange line represents the MCO average.

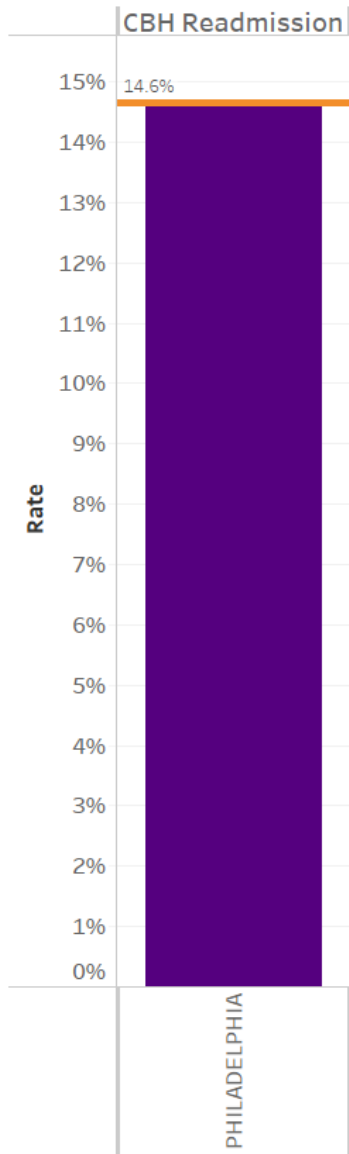


Figure 2.9: MY 2020 REA Readmission Rates for CBH.

Figure 2.10 shows that the Philadelphia County rate of 14.6% (red) was statistically significantly different from the HC BH (Statewide) rate of 13.6% (grey).

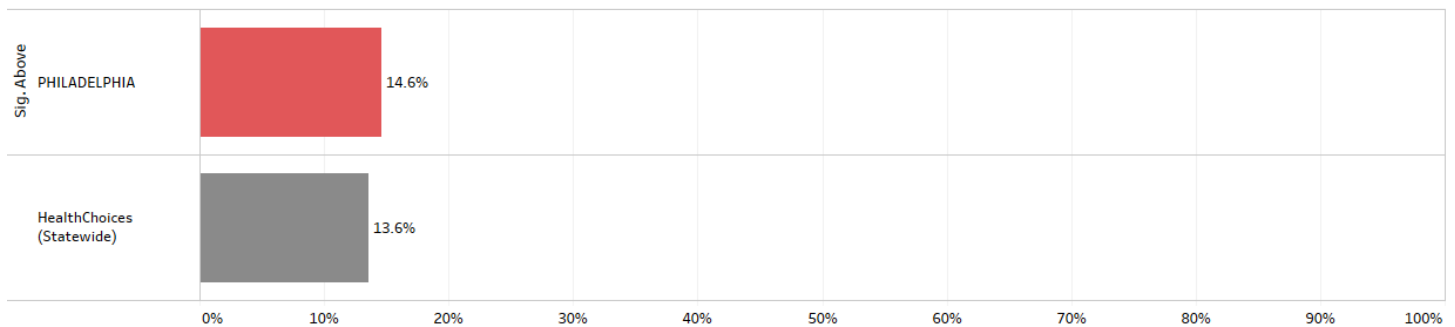


Figure 2.10: Statistically Significant Differences in CBH/Philadelphia County MY 2020 REA Readmission Rates (All Ages). CBH/Philadelphia County MY 2020 REA Readmission rate for all ages that is significantly different from the HC BH (statewide) MY 2020 REA readmission rate (all ages).

Recommendations

As with most reporting years, it is important to note that there were some changes to the HEDIS MY 2020 specifications, including removal of the mental health provider requirement for specific types of follow-up visits, and the addition to the numerator of certain place of service types, including visits in behavioral healthcare settings and telehealth. MY 2020 also coincided with the COVID-19 pandemic, which likely negatively impacted the ability of payers and providers to ensure timely follow-up services after hospitalization. Understanding the precise nature and extent of that impact, however, will require more research. That said, efforts should continue to be made to improve Follow-Up After Hospitalization for Mental Illness performance, particularly for those BH-MCOs that performed below the HC BH Statewide rate. The following are recommendations that are informed by the MY 2020 review:

- The purpose of this remeasurement study is to inform OMHSAS, the Primary Contractors, and the BH-MCOs of the effectiveness of the interventions implemented between 2012 and 2020, which included actions taken as part of the previous PIP cycle, to promote continuous quality improvement with regard to timely follow-up care after psychiatric hospitalization. The information contained in this study should be used to further develop strategies for improving the likelihood that at-risk members will receive follow-up care. BH-MCOs are expected to demonstrate meaningful improvement in behavioral health follow-up rates in the next few years as a result of their interventions. To that end, the Primary Contractors and BH-MCOs participating in this study should identify interventions that are effective at improving behavioral health care follow-up. The Primary Contractors and BH-MCOs should continue to conduct additional root cause and barrier analyses to identify further impediments to receiving follow-up care and then implement action and monitoring plans to further increase their rates.
- It is essential to ensure that improvements are consistent, sustained across measurement years, and applicable to all groups. As previously noted, although not enumerated in this report, further stratified comparisons such as Medicaid Expansion versus non-Medicaid Expansion were carried out in a separate 2021 (MY 2020) FUH “Rates Report” produced by the EQRO and made available to BH-MCOs in an interactive Tableau workbook. BH-MCOs and Primary Contractors should review their data mechanisms to accurately identify this population. Previous recommendations still hold. For example, it is important for BH-MCOs and Primary Contractors to analyze performance rates by racial and ethnic categories and to target the populations where these racial and ethnic disparities may exist. The BH-MCOs and Primary Contractors should continue to focus interventions on populations that exhibit lower follow-up rates. Further, it is important to examine regional trends in disparities. For instance, previous studies indicate that African Americans in rural areas have relatively low follow-up rates, which stands in contrast to the finding that overall follow-up rates are generally higher in rural areas than in urban areas. Possible reasons for racial-ethnic disparities include access, cultural competency, and community factors; these and other drivers should be evaluated to determine their potential impact on performance. The aforementioned 2021 (MY 2020) FUH Rates Report is one source BH-MCOs can use to investigate potential health disparities in FUH.
- BH-MCOs and Primary Contractors are encouraged to review the 2021 (MY 2020) FUH Rates Report in conjunction with the corresponding 2021 (MY 2020) inpatient psychiatric readmission Rates (REA) Report. The BH-MCOs and Primary Contractors should engage in a focused review of those individuals who had an inpatient psychiatric readmission in less than 30 days to determine the extent to which those individuals either did or did not receive ambulatory follow-up/aftercare visit(s) during the interim period.
- Several contractors turned in follow-up rates that met or exceeded the HEDIS 2021 75th percentile. Other BH-MCOs could benefit from drawing lessons or at least general insights from their successes.

Continued efforts should be made to improve performance with regard to Readmission Within 30 Days of Inpatient Psychiatric Discharge, particularly for those BH-MCOs and Primary Contractors that did not meet the performance goal and/or performed below the HC BH Statewide rate.

MY 2020 saw a continued increase (worsening) for the MCO in readmission rates after psychiatric discharge, which remains above 10%. As a result, many recommendations previously proposed remain pertinent. Additionally, OMHSAS continues to examine strategies that may facilitate improvement in this area. In consideration of preliminary PIP work conducted and the past PIP cycle, the recommendations may assist in future discussions.

In response to the 2020 study, the following general recommendations are applicable to all five participating BH-MCOs:

- The purpose of this remeasurement study is to inform OMHSAS, the Primary Contractors, and the BH-MCOs of the effectiveness of the interventions implemented between 2012 and 2020 to promote continuous quality

improvement with regard to mental health discharges that result in a readmission. The information contained within this study should be used to further develop strategies for decreasing the likelihood that at-risk members will be readmitted. In 2019, the BH-MCOs concluded a PIP that focused on improving transitions to ambulatory care from inpatient psychiatric services. A new PIP starting in 2020 builds on the previous PIP by, among other things, including a performance indicator that measures MH-related readmissions within 30 days of a discharge for SUD. BH-MCOs are expected to bring about meaningful improvement in BH readmission rates for this subpopulation with comorbid BH conditions and for their HC BH members more generally. To that end, the Primary Contractors and BH-MCOs participating in this study should identify interventions that are effective at reducing BH readmissions. The Primary Contractors and BH-MCOs should continue to conduct additional root cause and barrier analyses to identify further impediments to successful transition to ambulatory care after an acute inpatient psychiatric discharge and then implement action and monitoring plans to further decrease their rates of readmission.

- The BH-MCOs and Primary Contractors should continue to focus interventions on populations that exhibit higher readmission rates (e.g., urban populations). Comparisons among demographic groups were carried out in a separate 2021 (MY 2020) REA “Rates Report” produced by the EQRO which is being made available to BH MCOs in an interactive Tableau workbook.
- BH-MCOs and Primary Contractors are encouraged to review the 2021 (MY 2020) REA Rates Report in conjunction with the aforementioned 2021 (MY 2020) FUH Rates Report. The BH-MCOs and Primary Contractors should engage in a focused review of those individuals who had an inpatient psychiatric readmission within 30 days to determine the extent to which those individuals either did or did not receive ambulatory follow-up/aftercare visit(s) during the interim period.

III: Compliance with Medicaid Managed Care Regulations

Objectives

This section of the EQR report presents a review by IPRO of the BH-MCO's compliance with the Medicaid Managed Care (MMC) structure and operations standards. In review year (RY) 2020, 67 Pennsylvania counties participated in this compliance evaluation.

Operational reviews are completed for each HC Oversight Entity. The Primary Contractor, whether contracting with an Oversight Entity arrangement or not, is responsible for their regulatory compliance to federal and state regulations and the HC BH PS&R Agreement compliance. The HC BH PS&R Agreement includes the Primary Contractor's responsibility for the oversight of BH-MCO's compliance.

The City of Philadelphia and Philadelphia County have the same border. As such, the City of Philadelphia is the HealthChoices Oversight Entity and the Primary Contractor that holds an agreement with Community Behavioral Health (CBH). CBH is a county-operated BH-MCO. Members enrolled in the HC BH Program in Philadelphia County are assigned CBH as their BH-MCO. The EQR for compliance with MMC regulations is based on OMHSAS reviews of Philadelphia County and CBH.

The findings in this section of the report are based on IPRO's assessment of data provided by OMHSAS resulting from the evaluation of CBH by OMHSAS monitoring staff within the past 3 review years (RYs 2020, 2019, and 2018). These evaluations are performed at the BH-MCO and HC Oversight Entity levels, and the findings are reported in OMHSAS's PEPS Review Application for 2020. OMHSAS opts to review compliance standards on a rotating basis due to the complexities of multi-county reviews. Some standards are reviewed annually, while others are reviewed triennially. In addition to those standards reviewed annually and triennially, some substandards are considered Readiness Review items only. Substandards reviewed at the time of the Readiness Review upon initiation of the HC BH Program contract are documented in the RAI. If the Readiness Review occurred within the 3-year time frame under consideration, the RAI was provided to IPRO. For those HC Oversight Entities and BH-MCOs that completed their Readiness Reviews outside of the current 3-year time frame, the Readiness Review substandards were deemed as complete. As necessary, the HC BH Program's PS&Rs are also used.

Description of Data Obtained

The documents informing the current report include the review of structure and operations standards completed by OMHSAS in August 2020 and entered into the PEPS Application as of March 2021 for RY 2020. Information captured within the PEPS Application informs this report. The PEPS Application is a comprehensive set of monitoring standards that OMHSAS staff reviews on an ongoing basis for each HC Oversight Entity/BH-MCO. Within each standard, the PEPS Application specifies the substandards or items for review, the supporting documents to be reviewed to determine compliance with each standard, the date of the review, the reviewer's initials, and an area in which to collect or capture additional reviewer comments. Based on the PEPS Application, an HC Oversight Entity/BH-MCO is evaluated against substandards that crosswalk to pertinent BBA regulations ("categories"), as well as against related supplemental OMHSAS-specific PEPS substandards that are part of OMHSAS's more rigorous monitoring criteria.

At the implementation of the PEPS Application in 2004, IPRO evaluated the standards in the PEPS Application and created a crosswalk to pertinent BBA regulations. For standards with substandards, all of the substandards within the standard informed the compliance determination of the corresponding BBA category. In 2009, as requested by OMHSAS, IPRO conducted a re-assessment of the crosswalk to distinguish the substandards required for fulfilling BBA requirements and those that are supplemental (i.e., state-specific) as part of OMHSAS's ongoing monitoring. In the amended crosswalk, the supplemental substandards no longer contribute to the compliance determination of the individual BBA categories. For example, findings for PEPS substandards concerning first-level complaints and grievances inform the compliance determination of the BBA categories relating to Federal and State Grievance Systems Standards. All of the PEPS substandards concerning second-level complaints and previously 2nd-level grievances are considered OMHSAS-specific substandards, and their compliance statuses are not used to make the compliance determination of the applicable BBA category.

In accordance with the updates to the CMS EQRO Protocols released in late 2020,²¹ IPRO updated the substandards crosswalk to reflect the changes to the organization and content of the relevant BBA provisions. The CMS updates included updates to the BBA provisions, which are now required for reporting. The standards that are subject to EQR review are contained in 42 C.F.R. 438, Subparts D and E, as well as specific requirements in Subparts A, B, C, and F to the extent that they interact with the relevant provisions in Subparts D and E. In addition, findings for RY 2020 are presented here under the new rubric of the three “CMS sections”: Standards, including enrollee rights and protections, quality assessment and performance improvement (QAPI) program, and grievance system. Substandard tallies for each category and section roll-up were correspondingly updated.

From time to time, standards or substandards may be modified to reflect updates to the Final Rule and corresponding BBA provisions. Standards or substandards that are introduced or retired are done so following the rotating 3-year schedule for all five BH-MCOs. This may, in turn, change the category tally of standards from one reporting year to the next. In 2020 (RY 2019), two Contractor-specific triennial substandards, 68.1.2 and 71.1.2, were added related to OMHSAS-specific provisions for complaints and grievances processes, respectively. Five MCO-specific substandards related to complaints and grievances provisions (four of which covered BBA provisions) were retired and replaced with eight new substandards related to complaints and grievances. Four of the substandards cover BBA provisions and four are OMHSAS-specific.

As was done for prior technical reports, review findings pertaining to the required BBA regulations are presented in this chapter. The review findings for selected OMHSAS-specific substandards are reported in **Appendix C**. The RY 2020 crosswalks of PEPS substandards to pertinent BBA regulations and to pertinent OMHSAS-specific PEPS substandards can be found in **Appendix A** and **Appendix B**, respectively.

Because OMHSAS’s review of the HealthChoices Oversight Entities and their subcontracted BH-MCOs occurs over a 3-year cycle, OMHSAS has the flexibility to assess compliance with the review standards on a staggered basis, provided that all BBA categories are reviewed within that time frame. The 3-year period is alternatively referred to as the Active Review period. The PEPS substandards from RY 2020, RY 2019, and RY 2018 provided the information necessary for the 2020 assessment. Those triennial standards not reviewed through the PEPS system in RY 2020 were evaluated on their performance based on RY 2019 and/or RY 2018 determinations, or other supporting documentation, if necessary. For those HC Oversight Entities that completed their Readiness Reviews within the 3-year time frame under consideration, RAI substandards were evaluated when none of the PEPS substandards crosswalked to a particular BBA category were reviewed.

For CBH, a total of 72 unique substandards were applicable for the evaluation of HC Oversight Entity/BH-MCO compliance with the BBA regulations for this review cycle or period (RYs 2020, 2019, 2018). In addition, 18 OMHSAS-specific substandards were identified as being related to, but are supplemental to, the BBA regulation requirements. Some PEPS substandards crosswalk to more than one BBA category, while each BBA category crosswalks to multiple substandards. In **Appendix C, Table C.1** provides a count of supplemental OMHSAS-specific substandards that are not required as part of BBA regulations but are reviewed within the 3-year cycle to evaluate the BH-MCO and the associated HC Oversight Entity against other state-specific Structure and Operations Standards.

Table 3.1 tallies the PEPs substandard reviews used to evaluate the HC Oversight Entity/BH-MCO compliance with the BBA regulations and includes counts of the substandards that came under active review during each year of the current period (RYs 2018–2020). Substandard counts under RY 2020 comprised annual and triennial substandards. Substandard counts under RYs 2019 and 2018 comprised only triennial substandards. By definition, only the last review of annual substandards is counted in the 3-year period. Because substandards may crosswalk to more than one category, the total tally of substandard reviews in **Table 3.1**, 94, differs from the unique count of substandards that came under active review (72).

Table 3.1: Tally of Substandards Pertinent to BBA Regulations Reviewed for CBH

BBA Regulation	Evaluated PEPS Substandards ¹		PEPS Substandards Under Active Review ²		
	Total	NR	2020	2019	2018
CMS EQR Protocol 3 "sections": Standards, including enrollee rights and protections					
Assurances of adequate capacity and services (42 C.F.R. § 438.207)	5	-	5	-	-
Availability of services (42 C.F.R. § 438.206, 42 C.F.R. § 10(h))	24	-	18	2	4
Confidentiality (42 C.F.R. § 438.224)	1	-	-	-	1
Coordination and continuity of care (42 C.F.R. § 438.208)	2	-	-	2	-
Coverage and authorization of services (42 C.F.R. Parts § 438.210(a-e), 42 C.F.R. § 441, Subpart B, and § 438.114)	4	-	2	2	-
Health information systems (42 C.F.R. § 438.242)	1	-	-	-	1
Practice guidelines (42 C.F.R. § 438.236)	6	-	-	2	4
Provider selection (42 C.F.R. § 438.214)	3	-	3	-	-
Subcontractual relationships and delegation (42 C.F.R. § 438.230)	8	-	-	-	8
CMS EQR Protocol 3 "sections": Quality assessment and performance improvement (QAPI) program					
Quality assessment and performance improvement program (42 C.F.R. § 438.330)	26	-	19	-	7
CMS EQR Protocol 3 "sections": Grievance system					
Grievance and appeal systems (42 C.F.R. § 438 Parts 228, 402, 404, 406, 408, 410, 414, 416, 420, 424)	14	-	2	12	-
Total	94	-	49	20	25

¹ The total number of substandards required for the evaluation of HC Oversight Entity/BH-MCO compliance with the BBA regulations. Any PEPS substandards not reviewed indicate substandards that were deemed not applicable to the HC Oversight Entity/BH-MCO.

² The number of substandards that came under active review during the cycle specific to the review year. Because substandards may crosswalk to more than one category, the total tally of substandard reviews, 94, differs from the unique count of substandards that came under active review (72).

BBA: Balanced Budget Act; PEPS: Program Evaluation Performance Summary; CBH: Community Behavioral Health; NR: substandards not reviewed; CMS: Centers for Medicare and Medicaid Services; EQR: external quality review; C.F.R: Code of Federal Regulations.

Determination of Compliance

To evaluate HC Oversight Entity/BH-MCO compliance with individual provisions, IPRO grouped the required and relevant monitoring substandards by provision (category) and evaluated the Primary Contractors' and BH-MCO's compliance status with regard to the PEPS substandards. Each substandard was assigned a value of "met," "partially met," or "not met" in the PEPS Application submitted by the Commonwealth. If a substandard was not evaluated for a particular HC Oversight Entity/BH-MCO, it was assigned a value of "not determined." Compliance with the BBA provisions was then determined based on the aggregate results across the 3-year period of the PEPS items linked to each provision. If all items were met, the HC Oversight Entity/BH-MCO was evaluated as compliant; if some were met and some were partially met or not met, the HC Oversight Entity/BH-MCO was evaluated as partially compliant. If all items were not met, the HC Oversight Entity/BH-MCO was evaluated as non-compliant. A value of not applicable (N/A) was assigned to provisions for which a compliance review was not required. A value of null was assigned to a provision when none of the existing PEPS substandards directly covered the items contained within the provision, or if it was not covered in any other documentation provided. Finally, all compliance results within a given category were aggregated to arrive at a summary compliance status for the category. For example, compliance findings relating to provider network mix and capacity are summarized under Assurances of adequate capacity and services, 42 C.F.R. § 438.207.

The format for this section of the report was developed to be consistent with the categories prescribed by BBA regulations. This document groups the regulatory requirements under subject headings that are consistent with the three sections set out in the BBA regulations and described in "Protocol 3: Review of Compliance with Medicaid and CHIP Managed Care Regulations."²² Under each general section heading are the individual regulatory categories

appropriate to those headings. IPRO’s findings are therefore organized under Standards, including Enrollee Rights and Protections, Quality Assessment and Performance Improvement (QAPI) Program, and Grievance System.

This format reflects the goal of the review, which is to gather sufficient foundation for IPRO’s required assessment of the HC Oversight Entity/BH-MCO’s compliance with BBA regulations as an element of the analysis of their strengths and weaknesses. In addition, this level of analysis avoids any redundancy with the detailed level of review found in the PEPS documents.

Findings

Seventy-two (72) unique PEPS substandards were used to evaluate CBH and Philadelphia County compliance with BBA regulations in RY 2020.

Standards, Including Enrollee Rights and Protections

The general purpose of the regulations included in this section is to ensure that each Primary Contractor/BH-MCO has written policies regarding enrollee rights, complies with applicable Federal and State laws that pertain to enrollee rights, and that the Primary Contractor/BH-MCO ensures that its staff and affiliated providers take into account those rights when furnishing services to enrollees. **Table 3.2** presents the MCO and Primary Contractor substandard findings by categories.

Table 3.2: Compliance with Standards, including Enrollee Rights and Protections

Federal Category and CFR Reference	Category Substandard Count	MCO Compliance Status	Primary Contractor	Substandard Status		
				Fully Compliant	Partially Compliant	Not Compliant
Assurances of adequate capacity and services 42 C.F.R. § 438.207	5	Compliant	Philadelphia	1.1, 1.2, 1.4, 1.5, 1.6	-	-
Availability of Services 42 C.F.R. § 438.206, 42 C.F.R. § 10(h)	24	Partial	Philadelphia	1.1, 1.2, 1.3, 1.4, 1.5, 1.6, 1.7, 23.1, 23.2, 23.3, 23.4, 23.5, 24.1, 24.2, 24.3, 24.4, 24.5, 24.6, 28.1, 93.1, 93.2	28.2	93.3, 93.4
Confidentiality 42 C.F.R. § 438.224	1	Compliant	Philadelphia	120.1	-	-
Coordination and continuity of care 42 C.F.R. § 438.208	2	Partial	Philadelphia	28.1	28.2	-
Coverage and authorization of services 42 C.F.R. Parts § 438.210(a–e), 42 C.F.R. § 441, Subpart B, and § 438.114	4	Partial	Philadelphia	28.1	28.2, 72.1, 72.2	-
Health information systems 42 C.F.R. § 438.242	1	Compliant	Philadelphia	120.1	-	-
Practice guidelines 42 C.F.R. § 438.236	6	Partial	Philadelphia	28.1, 93.1, 93.2	28.2	93.3, 93.4
Provider selection 42 C.F.R. § 438.214	3	Partial	Philadelphia	10.1, 10.2	10.3	-
Subcontractual relationships and delegation	8	Compliant	Philadelphia	99.1, 99.2, 99.3, 99.4, 99.5, 99.6,	-	-

Federal Category and CFR Reference	Category Substandard Count	MCO Compliance Status	Primary Contractor	Substandard Status		
				Fully Compliant	Partially Compliant	Not Compliant
42 C.F.R. § 438.230				99.7, 99.8		

MCO: managed care organization; CFR: Code of Federal Regulations.

There are nine (9) categories within Standards, including Enrollee Rights and Protections. CBH was compliant with 4 categories and partially compliant with 5 categories.

For this review, 54 PEPS substandards were crosswalked to categories within Compliance with Standards, including Enrollee Rights and Protections. Fifty four (54) substandards were evaluated for Philadelphia County. Philadelphia County was compliant in 43 instances, partially compliant in seven instances, and non-compliant in four instances. Some PEPS substandards apply to more than one BBA Category. As a result, one partially compliant or non-compliant rating for an individual PEPS substandard could result in several BBA Categories with partially compliant or non-compliant ratings.

Availability of Services

CBH was partially compliant with Availability of Services due to partial compliance with 1 substandard within Standard 28 (RY 2019), and non-compliance with 2 substandards within Standard 93 (RY 2018).

CBH was partially compliant with Substandard 2 of Standard 28.

Standard 28: BH-MCO has a comprehensive, defined program of care that incorporates longitudinal disease management.

Substandard 2: The medical necessity decision made by the BH-MCO Physician/Psychologist Advisor is supported by documentation in the denial record and reflects appropriate application of medical necessity criteria.

CBH was non-compliant with Substandards 3 and 4 of Standard 93.

Standard 93: The BH-MCO Evaluates the Effectiveness of Services received by Members. The quality of care and the effectiveness of the services received by members are evaluated in the following areas: changes made to service access; provider network adequacy; appropriateness of service authorization; inter-rater reliability; complaint, grievance and appeal processes; and treatment outcomes.

Substandard 3: The BH-MCO reports monitoring results for: authorizations; complaint, grievance and appeal processes; rates of denials; and rates of grievances upheld or overturned.

Substandard 4: The BH-MCO reports monitoring results for treatment outcomes: readmission rates, follow up after hospitalization rates, and consumer satisfaction.

Coordination and Continuity of Care

CBH was partially compliant with Coverage and Authorization of Services due to partial compliance with 1 substandard within Standard 28 (RY 2020).

Standard 28: See Standard description and determination of compliance under Availability of Services.

Coverage and Authorization of Services

CBH was partially compliant with Coverage and Authorization of Services due to partial compliance with 1 substandard within Standard 28 (RY 2019) and partial compliance with 2 substandards within Standard 72 (RY 2020).

Standard 28: See Standard description and determination of compliance under Availability of Services.

CBH was non-compliant with Substandards 1 and 2 of Standard 72.

Standard 72: Denials or reduction of services are provided, in writing, to the member, parent/custodian of a child/adolescent, and/or county Children and Youth agency for children in substitute care. [E.3], p.39 and Appendix AA, Attachments 2a, 2b, 2c, and 2d].

Substandard 1: Denial notices are issued to members according to required timeframes and use the required template language.

Substandard 2: The content of the notices adhere to OMHSAS requirements (e.g., easy to understand and free from medical jargon; contains explanation of member rights and procedures for filing a grievance, requesting a DPW Fair Hearing, and continuation of services; contains name of contact person; contains specific member demographic

information; contains specific reason for denial; contains detailed description of requested services, denied services, and any approved services if applicable; contains date denial decision will take effect).

Practice Guidelines

CBH was partially compliant with Availability of Services due to partial compliance with 1 substandard within Standard 28 (RY 2019) and non-compliance with 2 substandards within Standard 93 (RY 2018).

Standard 28: See Standard description and determination of compliance under Availability of Services.

Standard 93: See Standard description and determination of compliance under Availability of Services.

Provider Selection

CBH was partially compliant with Provider Selection due to partial compliance with 1 substandard within Standard 10 (RY 2020).

CBH was partially compliant with Substandard 3 of Standard 10.

Standard 10: BH-MCO has ongoing process for review of provider credentialing. Credentials verified according to schedule.

Substandard 3: Recredentialing incorporates results of provider profiling.

Quality Assessment and Performance Improvement (QAPI) Program

The general purpose of the regulations included under this subpart is to ensure that all services available under the Commonwealth’s MMC Program, the HealthChoices Program, are available and accessible to MCO enrollees. The PEPS documents for each Primary Contractor include an assessment of the Primary Contractors/BH-MCO’s compliance with regulations found in Subpart D. **Table 3.3** presents the findings by categories consistent with the regulations.

Table 3.3: Compliance with Quality Assessment and Performance Improvement Program

Federal Category and CFR Reference	Category Substandard Count	MCO Compliance Status	Primary Contractor	Substandard Status		
				Fully Compliant	Partially Compliant	Not Compliant
Quality assessment and performance improvement program 42 C.F.R. § 438.330	26	Partial	Philadelphia	91.1, 91.2, 91.3, 91.4, 91.5, 91.6, 91.7, 91.8, 91.9, 91.10, 91.11, 91.12, 91.13, 91.14, 91.15, 93.1, 93.2, 98.1, 98.2, 98.3, 104.1, 104.2, 104.3, 104.4	-	93.3, 93.4

MCO: managed care organization; CFR: Code of Federal Regulations.

For this review, 26 substandards were crosswalked to Quality Assessment and Performance Improvement Program. All 26 substandards were reviewed for Philadelphia County. Philadelphia County was compliant with 24 substandards and non-compliant with 2 substandards.

Quality Assessment and Performance Improvement Program

CBH was partially compliant with Quality Assessment and Performance Improvement Program due to non-compliance with 2 substandards within Standard 93 (RY 2019).

Standard 93: See Standard description and determination of compliance under Availability of Services.

Grievance System

The general purpose of the regulations included under this subpart is to ensure that enrollees have the ability to pursue grievances. The PEPS documents include an assessment of the Primary Contractor/BH-MCO's compliance with regulations found in Subpart F. **Table 3.4** presents the findings by categories consistent with the regulations.

Table 3.4: Compliance with Grievance System

Federal Category and CFR Reference	Category Substandard Count	MCO Compliance Status	Primary Contractor	Substandard Status		
				Fully Compliant	Partially Compliant	Not Compliant
Grievance and appeal systems 42 C.F.R. § 438 Parts 228, 402, 404, 406, 408, 410, 414, 416, 420, 424	14	Partial	Philadelphia	68.1, 68.3, 68.4, 68.7, 71.1, 71.2, 71.3, 71.4, 71.7, 71.9	68.2, 72.1, 72.2	68.9

MCO: managed care organization; CFR: Code of Federal Regulations.

For this review, 14 substandards were crosswalked to Grievance System. All 14 substandards were reviewed for Philadelphia County. Philadelphia County was compliant with 10 substandards, partially compliant with 3 substandards, and non-compliant with 1 substandard.

Grievance and Appeal Systems

CBH was partially compliant with Grievance and Appeal Systems due to partial compliance with 1 substandard within PEPS Standard 68 (RY 2019), partial compliance with 2 substandards within Standard 72 (RY 2020), and non-compliance with 1 substandard within PEPS Standard 68 (RY 2019).

CBH was partially compliant with Substandard 2 of Standard 68.

Standard 68: The Complaint and Fair Hearing processes, procedures and Member rights related to the processes are made known to Members, BH-MCO staff and the provider network through manuals, training, handbooks, etc.

Substandard 2: Interview with the Complaint Manager(s) demonstrates effective oversight of the Complaint process.

CBH was non-compliant with Substandard 9 of Standard 68.

Standard 68: The Complaint and Fair Hearing processes, procedures and Member rights related to the processes are made known to Members, BH-MCO staff and the provider network through manuals, training, handbooks, etc.

Substandard 9: Complaint case files include documentation of any referrals of Complaint issues to Primary Contractor/BH-MCO committees for further review and follow-up. Evidence of subsequent corrective action and follow-up by the respective Primary Contractor/BH-MCO Committee must be available to the Complaint staff, either by inclusion in the Complaint case file or reference in the case file to where the documentation can be obtained for review.

CBH was partially compliant with Substandards 1 and 2 of Standard 72.

Standard 72: Denials or reduction of services are provided, in writing, to the member, parent/custodian of a child/adolescent, and/or county Children and Youth agency for children in substitute care. [E.3], p. 39 and Appendix AA, Attachments 2a, 2b, 2c, and 2d].

Substandard 1: Denial notices are issued to members according to required timeframes and use the required template language.

Substandard 2: The content of the notices adhere to OMHSAS requirements (e.g., easy to understand and free from medical jargon; contains explanation of member rights and procedures for filing a grievance, requesting a DPW Fair Hearing, and continuation of services; contains name of contact person; contains specific member demographic information; contains specific reason for denial; contains detailed description of requested services, denied services, and any approved services if applicable; contains date denial decision will take effect).

IV: Validation of Network Adequacy

Objectives

As set forth in 42 CFR §438.358, validation of network adequacy is a mandatory EQR activity. The purpose of this section is to assess the BH-MCO's network adequacy in accordance with standards established under 42 CFR § 438.68(b) (1)(iii) and 457.1218.

Description of Data Obtained

For the 2020 review year, the BH-MCO's network adequacy was assessed based on compliance with certain federal and OMHSAS-specific standards that were crosswalked to standards falling directly or indirectly under 42 CFR § 438.68(b) (1)(iii) and 457.1218. Compliance status was determined as part of the larger assessment of compliance with MMC regulations. As of MY 2020, EQR validation protocols for assessing network adequacy had not been published by CMS. Since the publication of the *2020 Medicaid and CHIP Managed Care Final Rule*, OMHSAS is actively reviewing its network adequacy monitoring program to ensure all relevant requirements are covered in the annual validation activity going forward. For behavioral health, those requirements include: quantitative network adequacy standards, ensuring timely access to services, ensuring provider accessibility, allowing access to out-of-network providers, documenting an MCO's capacity to serve all enrollees, and adhering to the 2008 Mental Health Parity and Addictions Equity Act (MHPAEA) regulations on treatment limitations.²³

Findings

Table 4.1 describes the RY 2020 compliance status of CBH with respect to network adequacy standards that were in effect in 2020. Definitions for most standards may be found in **Section III**, Compliance with Medicaid Managed Care Regulations. The following standards are specific to validation of network adequacy (any substandards for which the MCO is not fully compliant are defined further below):

Standard 11: BH-MCO has conducted orientation for new providers and ongoing training for network.

Standard 59: BM-MCO has implemented public education and prevention programs, including behavioral health educational materials.

Standard 78: Evidence exists of the County's oversight of functions and activities delegated to the BH-MCO including: a. County Table of Organization showing a clear organization structure for oversight of BH-MCO functions. b. In the case of a multi-county contract, the Table of Organization shows a clear relationship among and between Counties' management structures, as it relates to the BH-MCO oversight. c. The role of the Single County Authority (SCA) in oversight is clear in the oversight structure. d. Meeting schedules and attendee minutes reflect County oversight of the BH-MCO (e.g., adequate staff with appropriate skills and knowledge that regularly attend meetings and focus on monitoring the contract and taking appropriate action, such as CAPs. e. Documentation of the County's reviews and/or audits of quality and accuracy of the major BH-MCO functions, including: 1) Care Management, 2) Quality Assurance (QA), 3) Financial Programs, 4) MIS, 5) Credentialing, 6) Grievance System, 7) Consumer Satisfaction, 8) Provider Satisfaction, 9) Network Development, Provider Rate Negotiation, and 10) Fraud, Waste, and Abuse (FWA).

Standard 100: Utilization Management and Quality Management: Provider Satisfaction: The Primary Contractor, either directly or via a BH-MCO or other subcontractor, must have systems and procedures to assess provider satisfaction with network management. The systems and procedures must include, but not be limited to, an annual provider satisfaction survey. Areas of the survey must include claims processing, provider relations, credentialing, prior authorization, service management and quality management.

Table 4.1: Compliance with Standards Related to Network Adequacy

Standard Description	Substandard Count	MCO Compliance Status	Primary Contractors	Substandard Status		
				Fully Compliant	Partially Compliant	Not Compliant
Standard 1	7	Compliant	Philadelphia	1.1, 1.2, 1.4, 1.5, 1.6, 1.7	-	-
Standard 10	3	Partially Compliant	Philadelphia	10.1, 10.2	10.3	-
Standard 11	3	Compliant	Philadelphia	11.1, 11.2, 11.3	-	-
Standard 23	5	Compliant	Philadelphia	23.1, 23.2, 23.3, 23.4, 23.5	-	-
Standard 24	6	Compliant	Philadelphia	24.1, 24.2, 24.3, 24.4, 24.5, 24.6	-	-
Standard 59	1	Compliant	Philadelphia	59.1	-	-
Standard 78	5	Partially Compliant	Philadelphia	78.1, 78.2, 78.4	78.3	-
Standard 91	15	Compliant	Philadelphia	91.1, 91.2, 91.3, 91.4, 91.5, 91.6, 91.7, 91.8, 91.9, 91.10, 91.11, 91.12, 91.13, 91.14, 91.15	-	-
Standard 93	4	Partially Compliant	Philadelphia	93.1, 93.2	-	93.3, 93.4
Standard 99	8	Compliant	Philadelphia	99.1, 99.2, 99.3, 99.4, 99.5, 99.6, 99.7, 99.8	-	-
Standard 100	1	Compliant	Philadelphia	100.1	-	-

MCO: managed care organization; CFR: Code of Federal Regulations.

For this review, 58 substandards were crosswalked to Network Adequacy. All 58 substandards were reviewed for CBH and Philadelphia. CBH and Philadelphia were compliant with 53 substandards, partially compliant with two substandards, and not compliant with two substandards. Substandard 78.5, related to other significant findings, did not apply.

CBH was partially compliant with Standard 10 due to partial compliance with one substandard.

Standard 10: See Substandard description under **Section III**, Provider Selection.

CBH was partially compliant with Standard 78 due to partial compliance with one substandard.

Standard 78 (see description above)

Substandard 3: There is evidence of County leadership to promote recovery and resiliency.

CBH was partially compliant with Standard 93 due to non-compliance with two substandards.

Standard 93: See Substandard descriptions under **Section III**, Availability of Services.

V: Quality Studies

Objectives

The purpose of this section is to describe quality studies performed in 2020 for the HealthChoices population. The studies are included in this report as optional EQR activities that occurred during the Review Year.²⁴

Integrated Community Wellness Centers

In 2020, PA DHS made the decision to discontinue participation in the CCBHC Demonstration but to continue and build on the CCBHC model in a PA DHS-administered Integrated Community Wellness Centers (ICWC) program under an MMC agreement with CMS. The purpose of the CCBHC Demonstration was to develop and test an all-inclusive (and all-payer) prospective payment system model for community clinics to integrate behavioral and physical health care services in a more seamless manner. The model is centered on the provision of nine core services. Crisis services, behavioral health screening, assessment and diagnosis, treatment planning, and outpatient mental health and substance use services, along with outpatient clinic primary care screening and monitoring, are provided or managed directly by the ICWC clinics. The other services, including targeted case management, peer support, psychiatric rehabilitation services, and intensive community-based mental health care to members of the armed forces and veterans may be provided through a contract with a Designated Collaborating Organization (DCO). To receive CCBHC certification, clinics also had to provide a minimum set of evidence-based practices (EBP), which was selected based on community needs assessments and centered on recovery-oriented care and support for children, youth, and adults. Under ICWC, the same nine core services of the CCBHC model are provided under PA's HealthChoices MMC program using a similar bundled payment arrangement with clinics certified to participate as ICWC clinics. For the first year of ICWC, 2020, the original seven clinics—Berks Counseling Center (located in Reading, PA), CenClear (with a clinic site in Clearfield, PA, and in Punxsutawney, PA), the Guidance Center (located in Bradford, PA), Northeast Treatment Centers (located in Philadelphia, PA), Pittsburgh Mercy (located in Pittsburgh, PA), and Resources for Human Development (located in Bryn Mawr, PA)—were invited to participate in the new program.

Description of Data Obtained

Like CCBHC, ICWC features a process measure Dashboard, hosted by the EQRO. Clinics enter monthly, quarterly, and year-to-date (YTD) data into a REDCap project which feeds, on a weekly basis, a server-based Tableau workbook where clinics are able to monitor progress on the implementation of their ICWC model. Using the Dashboard, clinics in 2020 tracked and reported on clinical activities in a range of quality domains reflecting the priorities of the initiative: clinic membership, process, access and availability, engagement, evidence-based practices, and client satisfaction. The Tableau workbook also featured a comparative display that showed clinic and statewide results on each process measure.

Findings

In 2020, the number of individuals receiving at least one core service dropped slightly to just over 17,700 from just over 19,400 in 2019 (the second year of the CCBHC demonstration). The unweighted average (across all the clinics) number of days until initial evaluation was 8 days. In the area of depression screening and follow-up, more than 94% of positive screenings resulted in the documentation of a follow-up plan the same day. More than 3,700 individuals within the ICWC program received drug and alcohol outpatient or intensive outpatient treatment during the period.

Process measures reflect important progress in increasing both the access and quality of community-based care for individuals with behavioral health conditions, but the ICWC quality measures are designed to more meaningfully measure the impact of these efforts. Under the CMS-approved ICWC preprint, a subset of the CCBHC measures is reported to CMS on an annual calendar year basis, along with HEDIS Follow-Up After High Intensity Care for Substance Use Disorder (FUI). **Table 5.1** summarizes how well the ICWC clinics did on quality measures compared to applicable performance targets and national benchmarks.

Table 5.1: ICWC Quality Performance Compared to Targets and National Benchmarks

Measure	ICWC Weighted Average	Comparison		
		ICWC 2020 Performance Target	National Benchmark	Benchmark Description
Follow-Up After High-Intensity Care for Substance Use Disorder (FUI) – 7 day	9.9%	N/A (baseline year)	32.45%	HEDIS 2021 Quality Compass 50th percentile
Follow-Up After High-Intensity Care for Substance Use Disorder (FUI) – 30 day	20.1%	N/A (baseline year)	53.75%	HEDIS 2021 Quality Compass 50th percentile
Follow-Up Care for Children Prescribed ADHD Medication (ADD) - Initiation	74.6%	80.2%	43.0%	HEDIS 2021 Quality Compass 50th percentile
Follow-Up Care for Children Prescribed ADHD Medication (ADD) - Continuation	81.5%	89.6%	54.7%	HEDIS 2021 Quality Compass 50th percentile
Follow-Up After Emergency Department Visit for Alcohol and Other Drug Abuse or Dependence (FUA) - 7 day	21.5%	26.7%	12.7%	HEDIS 2021 Quality Compass 50th percentile
Follow-Up After Emergency Department Visit for Alcohol and Other Drug Abuse or Dependence (FUA) - 30 day	33.7%	38.8%	19.3%	HEDIS 2021 Quality Compass 50th percentile
Follow-Up After Emergency Department Visit for Mental Illness (FUM) - 7 day	100%	53.4%	39.1%	HEDIS 2021 Quality Compass 50th percentile
Follow-Up After Emergency Department Visit for Mental Illness (FUM) - 30 day	100%	64.2%	55.2%	HEDIS 2021 Quality Compass 50th percentile
Initiation and Engagement of Alcohol and Other Drug Abuse or Dependence Treatment (IET), ages 18-64 - Initiation	19.0%	28.2%	43.5%	HEDIS 2021 Quality Compass 50th percentile
Initiation and Engagement of Alcohol and Other Drug Abuse or Dependence Treatment (IET), ages 18-64 - Engagement	4.0%	18.8%	14.2%	HEDIS 2021 Quality Compass 50th percentile
Follow-Up After Hospitalization for Mental Illness, ages 21 and older (FUH-A) - 7 day	12.0%	30.2%	31.4%	HEDIS 2021 Quality Compass 50th percentile
Follow-Up After Hospitalization for Mental Illness, ages 21 and older (FUH-A) - 30 day	20.0%	41.6%	52.9%	HEDIS 2021 Quality Compass 50th percentile
Follow-Up After Hospitalization for Mental Illness, ages 6-20 (FUH-C) - 7 day	18.1%	43.8%	45.5%	HEDIS 2021 Quality Compass 50th percentile
Follow-Up After Hospitalization for Mental Illness, ages 6-20 (FUH-C) - 30 day	26.3%	55.6%	70.0%	HEDIS 2021 Quality Compass 50th percentile
Antidepressant Medication Management (AMM) - Acute	58.0%	48.8%	53.6%	HEDIS 2021 Quality Compass 50th percentile
Antidepressant Medication Management (AMM) - Continuation	81.5%	89.5%	45.7%	HEDIS 2021 Quality Compass 50th percentile
Adherence to Antipsychotic Medications for Individuals with Schizophrenia (SAA)	56.1%	57.3%	62.1%	HEDIS 2021 Quality Compass 50th percentile
Diabetes Screening for People with Schizophrenia or Bipolar Disorder Who Are Using Antipsychotic Medications (SSD)	72.2%	85.0%	82.1%	HEDIS 2021 Quality Compass 50th percentile

Measure	ICWC Weighted Average	Comparison		
		ICWC 2020 Performance Target	National Benchmark	Benchmark Description
Plan All-Cause Readmissions Rate (PCR)	25%	6.9%	9.9%	HEDIS 2021 Quality Compass 50th percentile
Child and Adolescent Major Depressive Disorder (MDD): Suicide Risk Assessment (SRA-BH-C)	52.2%	16.2%	17.1%	MIPS 2021 (eCQM)
Adult Major Depressive Disorder (MDD): Suicide Risk Assessment (SRA-A)	39.7%	26.3%	12.2%	MIPS 2021 (eCQM)
Screening for Depression and Follow-Up Plan (CDF-BH)	36.0%	37.7%	50.2%	MIPS 2021 (CQM)
Depression Remission at Twelve Months (DEP-REM-12)	9.4%	N/A	4.9%	MIPS 2021 (eCQM)
Body Mass Index (BMI) Screening and Follow-Up Plan	35.7%	51.0%	49.2%	MIPS 2021 (eCQM)
Weight Assessment for Children/Adolescents: Body Mass Index Assessment for Children/Adolescents (WCC-BH)	51.0%	64.5%	68.4%	HEDIS 2021 Quality Compass 50th percentile
Tobacco Use: Screening and Cessation Intervention (TSC)	70.5%	56.0%	60.4%	MIPS 2021 (CQM)
Unhealthy Alcohol Use: Screening and Brief Counseling (ASC)	69.2%	51.1%	68.4%	MIPS 2021 (CQM)

ICWC: integrated community wellness center; HEDIS: Healthcare Effectiveness Data and Information Set; N/A: not applicable; ADHD: attention deficit/hyperactivity disorder; MIPS: Merit-Based Incentive Pay System; eCQM: electronic clinical quality measure; CQM: clinical quality measure.

Measures where the ICWC clinics surpassed targets include: FUM, AMM (Acute), PCR, SRA-BH-C, SRA-A, TSC, and ASC.

VI: 2020 Opportunities for Improvement – MCO Response

Current and Proposed Interventions

The general purpose of this section is to assess the degree to which each BH-MCO has effectively addressed the opportunities for improvement cited by IPRO in the 2020 (MY 2019) EQR Technical Report and in the 2021 (MY 2020) FUH All-Ages Goal Report.

The request for MCO response to the opportunities for improvement related to PEPS deficiencies was distributed in June 2021. The 2021 EQR Technical Report is the 14th report to include descriptions of current and proposed interventions from each BH-MCO that address the prior year's deficiencies.

The BH-MCOs are required by OMHSAS to submit descriptions of current and proposed interventions using the Opportunities for Improvement form developed by IPRO to ensure that responses are reported consistently across the Pennsylvania Medicaid BH-MCOs. These activities follow a longitudinal format and are designed to capture information relating to:

- follow-up actions that the BH-MCO has taken through June 30, 2020, to address each recommendation;
- future actions that are planned to address each recommendation;
- when and how future actions will be accomplished;
- the expected outcome or goals of the actions that were taken or will be taken; and
- the BH-MCO's process(es) for monitoring the action to determine the effectiveness of the actions taken.

The documents informing the current report include the MCO responses submitted to IPRO in October 2021 to address partial and non-compliant PEPS standards findings, as well as any additional relevant documentation provided by the BH-MCO.

The request for MCO response to the opportunities for improvement related to MY 2020 underperformance in the HEDIS FUH All-Ages measures were distributed, along with the MY 2020 results, in January 2022. The Root Cause Analysis and Quality Improvement Plan form similarly provides for a standardized format for BH-MCOs to describe root causes of underperformance and propose a detailed quality improvement plan to address those factors, complete with a timeline of implementation, monitoring, and reporting activities. BH-MCOs submitted their responses by March 15, 2022.

Quality Improvement Plan for Partial and Non-compliant PEPS Standards

All actions targeting opportunities for improvement with the structure and operational standards are monitored for effectiveness by OMHSAS. Based on the OMHSAS findings for RY 2019, CBH began to address opportunities for improvement sections pertaining to compliance with Medicaid Managed Care regulations. Within Compliance with Standards, including Enrollee Rights and Protections, CBH was partially compliant with the following BBA categories: Availability of Services, Coordination and continuity of care, Coverage and authorization of services, and Practice Guidelines. CBH was partially compliant with Quality assessment and performance improvement program under the same-named category. Within Compliance with Grievance System, CBH was partially compliant with Grievance and appeal systems. Proposed actions and evidence of actions taken by CBH were monitored through action plans, technical assistance calls, monitoring meetings, and quality and compliance reviews. OMHSAS will continue these monitoring activities until sufficient progress has been made to bring CBH into compliance with the relevant Standards.

Table 6.1 presents CBH's responses to opportunities for improvement cited by IPRO in the 2020 (MY 2019) EQR Technical Report, detailing current and proposed interventions. Objects embedded within the tables have been removed as exhibits but are available upon request.

Table 6.1: CBH Responses to Opportunities for Improvement

Reference Number	Opportunity for Improvement	Date(s) of Follow-up Action(s) Taken/Planned	MCO Response
Review of compliance with standards conducted by the Commonwealth in reporting year (RY) 2017, RY 2018, and RY 2019 found CBH to be partially compliant with all three sections in CMS EQR Protocol 3: Review of Compliance with Medicaid and CHIP Managed Care Regulations.		Date(s) of follow-up action(s) taken through 6/30/21/Ongoing/None	Address within each category accordingly.
		Date(s) of future action(s) planned/None	Address within each category accordingly.
CBH 2020.01	Within CMS EQR Protocol 3: Enrollee Rights and Protections Regulations, CBH was partially compliant on four out of nine categories. The partially compliant categories are: <ol style="list-style-type: none"> 1. Availability of Services 2. Coordination and continuity of care 3. Coverage and authorization of services 4. Practice guidelines 	Q1-Q3 2021	PEPS 23.5: Member Services began updating the process for collecting information about translated documents. A policy and tracking spreadsheet have been developed to streamline the process.
		August 2021 - Ongoing	PEPS 28.2: Development of care management toolkit to build knowledge of specialized populations and resources for high needs members
		06/30/2021 - ongoing	PEPS 28.2: Establish clinical leadership meeting including assistant directors, directors, Senior director, and officers involved in UR as venue for reviewing care management program and making cross-departmental improvements
		February 2021 - Quarterly	PEPS 28.2: Revision of QMAT and addition of questions related to ACMR that could be aggregated into a departmental performance dashboard and also used for individual & team supervision
		2/1/2020	PEPS 93.3: References to Second Level Grievances were removed from the QM Program Description and Workplan and are no longer reported. On 2/8/2021, OMHSAS resolved the RY2018 CAP and stated the following: "The Documented Evidence of Completion that was submitted adequately addresses the CAP and no further action is required." See most recent QM Program Description:
		12/18/2018-2/18/2019	Follow-up Action: PEPS 93.4 #1 CBH completed a comprehensive Member Experience Survey. The results of the survey were reported in the Annual PEPS Evaluation on April 30 th in 2019, 2020, and 2021.

Reference Number	Opportunity for Improvement	Date(s) of Follow-up Action(s) Taken/Planned	MCO Response
			On 2/8/2021, OMHSAS resolved the RY2018 CAP and stated the following: “The Documented Evidence of Completion that was submitted adequately addresses the CAP and no further action is required.”
		2/1/2020	Follow-up Action: PEPS 93.4 #2 CBH will revise its workplan to ensure Member Experience goals are specific and measurable. The CBH 2020 QM Workplan was submitted to OMHSAS as part of the RY2018 review. On 2/8/2021, OMHSAS resolved the RY2018 CAP and stated the following: “The Documented Evidence of Completion that was submitted adequately addresses the CAP and no further action is required.”
		05/01/2020 - Ongoing	Follow-up Action: PEPS 72.1 #1. CBH will ensure that all Denial Letters are sent in a timely fashion with the use of a monthly timeliness of mailing that is distributed and reviewed with clinical leadership. Evidence: Meeting/Supervision Notes Timeliness of Mailing Dashboard Monitoring and Oversight of denial notices and DBHIDS oversight protocol:
		Fall 2021	Future Action: PEPS 72.1: <ul style="list-style-type: none"> To ensure the timeliness of denial letters, CBH will hire a Denials Specialist to review all requests daily and follow-up in real time on outstanding requests.
		11/1/2020 – 3/1/2021	PEPS 72.1 #1: CBH will use the Denial Letter Templates as indicated in Appendix AA. A sample monthly denial audit from DBHIDS is included below demonstrating the recent use of the correct denials template.
		11/1/2020 – 11/30/2020	PEPS 72.1 #2: Clinical Teams completed a training with staff on denials processes as evident by training curriculum and team meeting minutes.
		11/1/2020 – 3/1/2021	PEPS 72.1 #3: CBH corrected templated language in denial letter to include both 1- and 10-day timeframes. A sample monthly audit from DBHIDS was included above demonstrating the corrected change).

Reference Number	Opportunity for Improvement	Date(s) of Follow-up Action(s) Taken/Planned	MCO Response
		12/18/2020 - ongoing	<p>PEPS 72.2 #1:</p> <p>CBH will ensure that all Denial Letters contain a rationale that is easily understood and is free from medical jargon. CBH is addressing this by converting our annual Denial Letter training to an e-learning module. Staff will be required to view annually and can access at any time a refresher is needed.</p> <p>Evidence: E-learning module training records</p> <p>Denial Letter Training Curriculum</p>
		Fall 2021	<p>Future Action PEPS 72.2 #1:</p> <p>To ensure that denial letters have a rationale that is easily understood and is free from medical jargon, CBH will hire a Denials Specialist to review all requests daily before the letters are mailed.</p>
		5/1/2020 - Ongoing	<p>PEPS 72.2 #2:</p> <p>CBH will ensure that continued services are approved for less than requested, the rationale included behaviors and symptom improvements. CBH addressed this by updating the process for analysis of the Denial Audit to include specific staff members and their supervisor for follow-up. A sample of minutes below demonstrates the ongoing discussions with Clinical Directors to review Denial Audits. A sample of monthly denial audits was shared above.</p>
		Fall 2021	<p>Future Action PEPS 72.2 #2:</p> <p>CBH will be hiring a Denials Specialist position to review all Denial Letters before they are mailed to ensure that denials with continued services that are approved for less than requested have a rationale that includes behaviors and symptom improvements.</p>
CBH 2020.02	Within CMS EQR Protocol 3: Quality Assessment and Performance Improvement Regulations, CBH was partially compliant with quality assessment and performance	2/1/2020	<p>PEPS 93.3:</p> <p>References to Second Level Grievances were removed from the QM Program Description and Workplan and are no longer reported. On 2/8/2021, OMHSAS resolved the RY2018 CAP and stated the following: "The Documented Evidence of Completion that was submitted adequately addresses the CAP and no further action is required."</p> <p>See most recent QM Program Description:</p>
		12/18/2018-2/18/2019	PEPS 93.4 #1:

Reference Number	Opportunity for Improvement	Date(s) of Follow-up Action(s) Taken/Planned	MCO Response
	improvement program.		<p>CBH completed a comprehensive Member Experience Survey. The results of the survey were reported in the Annual PEPS Evaluation on April 30th in 2019, 2020, and 2021.</p> <p>On 2/8/2021, OMHSAS resolved the RY2018 CAP and stated the following: “The Documented Evidence of Completion that was submitted adequately addresses the CAP and no further action is required.”</p>
		2/1/2020	<p>PEPS 93.4 #2:</p> <p>CBH will revise its workplan to ensure Member Experience goals are specific and measurable. The CBH 2020 QM Workplan was submitted to OMHSAS as part of the RY2018 review. On 2/8/2021, OMHSAS resolved the RY2018 CAP and stated the following: “The Documented Evidence of Completion that was submitted adequately addresses the CAP and no further action is required.”</p>
		12/18/2018-2/18/2019	<p>PEPS 93.4 #1:</p> <p>CBH completed a comprehensive Member Experience Survey. The results of the survey were reported in the Annual PEPS Evaluation on April 30th in 2019, 2020, and 2021.</p> <p>On 2/8/2021, OMHSAS resolved the RY2018 CAP and stated the following: “The Documented Evidence of Completion that was submitted adequately addresses the CAP and no further action is required.”</p>
		6/1/2020 - Ongoing	<p>PEPS 68.2 #1:</p> <p>Monitoring process of Complaints with an audit checklist. CBH utilizes an internal audit tool for the complaints process. Complaints and Grievances Supervisor continues to conduct internal audits monthly. The results of the audits are reviewed by the Complaints and Grievances Supervisor and the Manager of Complaints and Grievances. The Complaints and Grievances Supervisor discusses and documents specific audit results with the Complaints and Grievances Specialist during supervision. See below:</p>
		11/16/2021 – 3/3/2021	<p>PEPS 68.2 #2:</p> <p>CBH updated the complaint protocol to reflect changes in the investigative process to include memo process and changes to summary sheet. The updated protocol continues to be followed by the Complaints and Grievances Specialists when conducting complaint investigations. Monitoring is done via the internal</p>

Reference Number	Opportunity for Improvement	Date(s) of Follow-up Action(s) Taken/Planned	MCO Response
			audit process.
		11/16/2020 – 8/2/2021	PEPS 68.2 #3: CBH conducted training on complaint protocol. The Manager of Complaints and Grievances will continue to conduct the training on the Complaint Protocol annually and when new employees are hired in the position of Complaints and Grievances Specialist.
		5/14/2020 – 8/2/2021	PEPS 68.2 #4: CBH conducted training on updated complaints investigation process. The Manager of Complaints and Grievances will continue to conduct the training on the Complaint Protocol annually and when new employees are hired in the position of Complaints and Grievances Specialist.
		11/16/2020 – 3/3/2021	PEPS 68.9 #1: The complaint protocol was updated to reflect steps to adequately address quality of care concerns identified during the complaint process. See complaint protocol above.
		3/3/2021 – 3/18/2021	PEPS 68.9 #2: A training was conducted on the complaint protocol. See complaint and grievance roster trainings above.
		11/23/2020 – 11/23/2020	PEPS 68.9 #3: The complaint audit tool was updated. See audit tool above.
		3/2020 – Ongoing	PEPS 68.9 #4: Complaint charts were audited by supervisory staff from June 2020 and ongoing using the internal audit tool. A summary of themes from audit results from June 2020 – February 2021 is below:
		05/01/2020 - Ongoing	Follow-up Action: PEPS 72.1 #1. CBH will ensure that all Denial Letters are sent in a timely fashion with the use of a monthly timeliness of mailing that is distributed and reviewed with clinical leadership. Evidence was included above.
		Fall 2021	Future Action: PEPS 72.1: To ensure the timeliness of denial letters, CBH will hire a Denials Specialist to review all requests daily and follow-up in real time on outstanding requests.
		11/1/2020 – 3/1/2021	PEPS 72.1 #1: CBH will use the Denial Letter Templates as indicated in Appendix AA. A sample monthly denial audit from DBHIDS is included below demonstrating the recent use of the correct denials template.

Reference Number	Opportunity for Improvement	Date(s) of Follow-up Action(s) Taken/Planned	MCO Response
			Evidence was included above.
		11/1/2020 – 11/30/2020	PEPS 72.1 #2: Clinical Teams completed a training with staff on denials processes as evident by training curriculum and team meeting minutes. Evidence was included above.
		11/1/2020 – 3/1/2021	PEPS 72.1 #3: CBH corrected templated language in denial letter to include both 1- and 10-day timeframes. A sample monthly audit from DBHIDS was included above demonstrating the corrected change).
		12/18/2020 - ongoing	PEPS 72.2 #1: CBH will ensure that all Denial Letters contain a rationale that is easily understood and is free from medical jargon. CBH is addressing this by converting our annual Denial Letter training to an e-learning module. Staff will be required to view annually and can access at any time a refresher is needed. See evidence submitted above.
		Fall 2021	Future Action PEPS 72.2 #1: To ensure that denial letters have a rationale that is easily understood and is free from medical jargon, CBH will hire a Denials Specialist to review all requests daily before the letters are mailed.
		5/1/2020 - Ongoing	PEPS 72.2 #2: CBH will ensure that continued services are approved for less than requested, the rationale included behaviors and symptom improvements. CBH addressed this by updating the process for analysis of the Denial Audit to include specific staff members and their supervisor for follow-up. A sample of minutes was shared above that demonstrates the ongoing discussions with Clinical Directors to review Denial Audits. A sample of monthly denial audits was shared above.
		Fall 2021	Future Action PEPS 72.2 #2: CBH will be hiring a Denials Specialist position to review all Denial Letters before they are mailed to ensure that denials with continued services that are approved for less than requested have a rationale that includes behaviors and symptom improvements.

CBH: Community Behavioral Health; MCO: managed care organization; RY: reporting year; OMHSAS: Office of Mental Health & Substance Abuse Services; CCM: Clinical Care Management; MA: Medical Affairs; PEPS: Program Evaluation Performance Summary; QM: Quality Management; EQR: external quality review.

Root Cause Analysis and Quality Improvement Plan

For PMs that are noted as opportunities for improvement in the EQR Technical Report, BH-MCOs are required to submit:

- a goal statement;
- root cause analysis and analysis findings;
- action plan to address findings;
- implementation dates; and
- a monitoring plan to assure action is effective and to address what will be measured and how often that measurement will occur.

Following several years of underperformance in the key quality indicator areas, OMHSAS determined in 2017 that it was necessary to change the PM remediation process so that BH-MCOs would set goals for the coming year. In 2017, this change meant, among other things, eliminating the requirement to complete root cause analyses (RCAs) and quality improvement plans (QIPs) responding to MY 2015. Instead, BH-MCOs were required to submit member-level files for MY 2016 in the summer of 2017, from which rates were calculated and validated by IPRO. MY 2016 Results of HEDIS Follow-Up After Hospitalization for Mental Illness (7- and 30-day) were then used to determine RCA and QIP assignments.

The change coincided with the coming phase-in of value-based payment (VBP) at the Primary Contractor level in January 2018. Thus, for the first time, RCA and QIP assignments were made at the Contractor level as well as at the BH-MCO level. Contractors receiving assignments completed their RCAs and QIPs in November 2017, while BH-MCOs completed their RCAs and QIPs by December 31, 2017. In 2018, coinciding with the carve-in of long-term care, OMHSAS directed BH-MCOs to begin focusing their RCA and QIP work on the HEDIS FUH All Ages measure and implemented a new goal-setting logic to spur performance improvement in the measure. Based on the MY 2017 performance, BH-MCOs were required to submit RCAs on the HEDIS FUH All Ages 7- and/or 30-day measure and QIPs to achieve their MY 2019 goals. Primary Contractors that scored below the 75th NCQA Quality Compass percentile were also asked to submit RCAs, with the option of submitting a QIP, either through their BH-MCO submission, or separately. BH-MCOs submitted their RCAs and QIPs on April 1, 2019. Primary Contractors submitted their RCAs and QIPs by April 30, 2019. As a result of this shift to a proactive process, MY 2019 goals for FUH All-Ages were never set.

Instead, in late 2020, MY 2020 results were calculated and compared to the MY 2020 goals to determine RCA and QIP assignments, along with goals, for MY 2021. In MY 2020 CBH scored below the 75th percentile on both the 7- and 30-day measures and, as a result, was required to complete an RCA and QIP response for both measures. **Table 6.2** presents CBH's submission of its RCA and QIP for the FUH All-Ages 7-day measure, and **Table 6.3** presents CBH's submission of its RCA and QIP for the FUH All-Ages 30-day measure. Objects embedded within the tables have been removed as exhibits but are available upon request.

Table 6.2: CBH RCA and QIP for the FUH 7-Day Measure (All Ages)

RCA for MY 2020 Underperformance: FUH 7-Day Measure (All Ages)

Discussion of Analysis (What data and analytic methods were employed to identify and link factors contributing to underperformance in the performance indicator in question?):

Community Behavioral Health (CBH) analyzed its 7-Day follow-up after hospitalization for mental illness (FUH) HEDIS data for measurement year (MY) 2020. There were not statistically significant differences between Hispanic/Latino members and Non-Hispanic/Latino members or between members identifying as female and those identifying as male. There was, however, a statistically significant difference between 7-day FUH for members aged 6-17 and members aged 18-64. Although there were no disparities found between rates for Black/African American and White members, Black/African American members had a statistically significantly lower 7-day FUH rate than all racial groups combined. As Black/African American members constituted 63% of all discharges in MY 2020, some QIP interventions will focus on addressing barriers to 7-day FUH specifically for adult Black/African American members. The detailed rates are in the column to the right.

CBH surveyed stakeholders, which included CBH Clinical, Provider Operations, Medical Affairs, and Quality Management Staff, CBH providers, and CBH members and families, to determine barriers to and change strategies for 7-day FUH. Barriers that were identified were grouped into categories in an Affinity Diagram, which was then used to determine root causes and develop a Fishbone Diagram. Both are embedded in the column to the right.

CBH identified existing interventions for each of the root causes and where there are gaps in existing interventions necessary to address root causes. CBH then used a prioritization matrix to prioritize the development of new interventions based on the change strategies from the survey. This prioritization matrix is at right. CBH will move forward with developing any intervention that scored higher than 20 on the prioritization matrix. CBH will also continue interventions from Calendar Year (CY)2021 that address barriers with a Critical or Important Causal Role.

CBH used the information from the RCA and prioritization matrix to develop the logic model of change for 7-Day FUH for interventions that will be undertaken during CY2022, which can be found at right. The logic model of

Describe here your overall findings. Please explain the underperformance and any racial (White vs non-White cohorts) and/or ethnic disparities using some kind of model linking causes and effects (logic model of change). The linkages and overall conclusions should be empirically supported whenever possible. Logic Model of Change templates, Causal Loop Diagrams, and similar best (RCA) practices are encouraged:

Group	7D FUH Numerator	7D FUH Denominator	7D FUH Rate
All	1,454	6,286	23.10%
Age 6-17	379	893	42.4%
Age 18-64	1,054	5,231	20.1%*
Black/African Am.	881	3,970	22.2%*
Asian	47	137	34.3%
Other	210	766	27.4%
White	315	1,399	22.5%
Hispanic/Latino	223	785	28.4%
Non-Hispanic/Latino	1,231	5,501	22.4%
Female	719	2,972	24.2%
Male	735	3,314	22.2%

*Statistically significant difference at p<.05

RCA for MY 2020 Underperformance: FUH 7–Day Measure (All Ages)

<p>change includes interventions from CY2021 that are being continued in CY2022.</p>	
<p>List out below the factors you identified in your RCA. <u>Insert more rows as needed</u> (e.g., if there are three provider factors to be addressed, insert another row, and split for the second column, to include the third factor).</p>	<p>Discuss each factor’s role in contributing to underperformance and any disparities (as defined above) in the performance indicator in question. Assess its “causal weight” as well as your MCO’s current and expected capacity to address it (“actionability”).</p>
<p>People/Members (1)</p> <p>5. Member not educated about need for follow-up:</p> <ol style="list-style-type: none"> a. Lack of member insight about chronic nature of mental illness b. Members admitted on a 302 and unwilling to continue treatment after discharge c. Member treatment fatigue 	<p>Causal Role (relationship to other factors and to the overall performance indicator) and Weight (Critical, Important, Somewhat Important, Not Very Important, Unknown):</p> <p>Causal Role: Members may lack insight into the chronic nature of mental illness and may not understand the need for and benefit of continued treatment after discharge. Members may have been admitted to the hospital on a 302 (involuntarily) and may be resistant to receiving continued treatment after discharge, not understanding the need for follow-up treatment. Members may experience “treatment fatigue” and become overwhelmed by many treatment appointments and unmotivated to continue with treatment after discharge.</p> <p>Weight: Critical</p> <p>Current and expected actionability: CBH Clinical Care Managers currently work with Acute Inpatient (AIP) providers to determine whether providers are educating members regarding need for continuing treatment after discharge and the chronic nature of mental illness. Through the implementation of planned interventions, CBH will be better able to ensure that member education is taking place during the discharge planning process.</p>
<p>People/Members (2)</p> <p>1. Co-occurring physical health disorders</p> <ol style="list-style-type: none"> a. Member prioritizes physical healthcare b. Physical health conditions interfere with member’s ability to follow-up with mental health treatment after discharge 	<p>Causal Role (relationship to other factors and to the overall performance indicator) and Weight (Critical, Important, Somewhat Important, Not Very Important, Unknown):</p> <p>Causal Role: Members with co-occurring physical health disorders may prioritize treatment for their physical health disorders after discharge, which may interfere with their ability to continue with their behavioral health treatment soon after discharge. Their physical health disorders may also interfere with their ability to follow-up with their behavioral health treatment, especially their ability to remember and travel to follow-up appointments. Physical health conditions may also exacerbate mental health symptoms, which could in turn impact a member’s ability to remember and keep follow-up appointments.</p>

RCA for MY 2020 Underperformance: FUH 7–Day Measure (All Ages)

	<p>Weight: Important</p> <p>Current and expected actionability: CBH currently addresses barriers to community-based treatment for members with co-occurring physical health conditions through its Integrated Care Plan (ICP) initiative and will continue to do so in CY2022. CBH will also work to ensure that physical health conditions are addressed by AIP providers during the discharge planning process.</p>
<p>People/Members (3)</p> <ol style="list-style-type: none"> 2. Co-occurring substance use disorder (SUD) <ol style="list-style-type: none"> a. Substance use interfering with member’s ability to follow-up with mental health treatment after discharge 	<p>Causal Role (relationship to other factors and to the overall performance indicator) and Weight (Critical, Important, Somewhat Important, Not Very Important, Unknown):</p> <p>Causal Role: The effects of SUD may interfere with a member’s ability to remember and keep follow-up appointments. SUD may also exacerbate symptoms of mental illness, which in turn could impact a member’s ability to remember and keep follow-up appointments.</p> <p>Weight: Critical</p> <p>Current and expected actionability: CBH currently addresses barriers to community-based treatment for members with co-occurring mental health and SUD through its Performance Improvement Plan (PIP) initiative and will continue to do so in CY2022.</p>
<p>People/Members (4)</p> <ol style="list-style-type: none"> 3. Members are not adherent to medication 	<p>Causal Role (relationship to other factors and to the overall performance indicator) and Weight (Critical, Important, Somewhat Important, Not Very Important, Unknown):</p> <p>Causal Role: If members are not included in decisions about medication or educated about medication side effects and the time it may take for medication to become effective, they may discontinue taking their medication if unexpected side effects occur or if medication takes longer to become effective than expected. Discontinuing medication will lead to an increase in symptoms, which may interfere with the member’s ability to remember and keep follow-up appointments.</p> <p>Weight: Critical</p> <p>Current and expected actionability: CBH can impact member adherence to medication through member and prescriber education and creation of prescribing best practice guidelines.</p>
<p>Providers (1)</p> <ol style="list-style-type: none"> 1. AIP providers unable to bill for services after discharge 	<p>Causal Role (relationship to other factors and to the overall performance indicator) and Weight (Critical, Important, Somewhat Important, Not Very Important, Unknown):</p> <p>Causal Role: Because AIP providers are not reimbursed by CBH for services</p>

RCA for MY 2020 Underperformance: FUH 7–Day Measure (All Ages)

	<p>after a member is discharged, they may be reluctant to provide services after discharge such as a reminder phone call or message about follow-up appointments for the member. If a member doesn't receive a reminder about follow-up appointments, they may not remember details about the appointment. Members may also be experiencing symptoms from their mental health conditions that are not being addressed after discharge and before their follow-up appointment, which may interfere with the member's ability to remember and keep follow-up appointments. The member may also be experiencing medication side effects that are not being addressed and which may interfere with the member's ability to remember and keep follow-up appointments.</p> <p>Weight: Somewhat Important</p> <p>Current and expected actionability: CBH is limited in our ability to impact Medicaid billing rules for AIP providers. However, we have planned interventions in CY2022 that may help to offset the cost of following up with members after discharge for AIP providers.</p>
<p>Providers (2)</p> <p>2. Poor or inadequate discharge planning:</p> <ul style="list-style-type: none"> a. AIP providers referring members to walk-in appointments when not appropriate for member. b. AIP providers not including member in discharge planning process. c. AIP providers not ensuring that member understands discharge plan and need for follow-up. d. Member not involved in medication decisions e. Providers not determining member and family communication preferences (voice vs. text) prior to discharge f. Prescriber not checking insurance to determine medication coverage g. Provider not submitting discharge plan to CBH in a timely manner 	<p>Causal Role (relationship to other factors and to the overall performance indicator) and Weight (Critical, Important, Somewhat Important, Not Very Important, Unknown):</p> <p>Causal Role: Poor or inadequate discharge planning by the AIP provider may have many impacts on a member's ability to follow-up after discharge. AIP providers may refer members to walk-in appointments with OP providers when that is not appropriate to meet that member's needs. AIP providers may not be including the member in the discharge planning process, which results in a discharge plan that is less likely to include member preferences such as choice of preferred follow-up provider and provider location. The AIP provider may not be ensuring that the member understands the discharge plan, including that a follow-up appointment has been made and the details of that appointment. The AIP provider may not be educating the member on the need for and benefits of continued treatment after discharge. The AIP provider may not be including the member in medication decisions and educating the member about side effects and time to medication effectiveness. If a member experiences medication side effects or does not understand the time to medication effectiveness, the member may discontinue taking their medication after discharge. This may lead to an increase in mental illness symptoms, which may in turn interfere with the member's ability to remember and keep follow-up appointments. The AIP provider may not determine</p>

RCA for MY 2020 Underperformance: FUH 7–Day Measure (All Ages)

	<p>member and family communication preferences prior to discharge. The AIP provider may call to remind the member of the follow-up appointment. If this is not the preferred communication method, the member may not answer the call and will not receive the follow-up appointment reminder. AIP providers may also not be submitting discharge plans to CBH in a timely manner, preventing Clinical Care Managers from being able to coordinate after-care for some members in a timely manner.</p> <p>Weight: Critical</p> <p>Current and expected actionability: CBH Clinical Care Managers currently work with AIP providers to determine whether timely discharge planning that follows best practices is taking place with members. Through the implementation of planned interventions, CBH will be better able to ensure that discharge planning that follows best practices is occurring.</p>
<p>Providers (3)</p> <p>3. Staff shortages:</p> <ul style="list-style-type: none"> h. insufficient availability of timely outpatient (OP) appointments i. Staffing shortages may cause providers to not accept new intakes j. Case management provider unable to open new case due to wait list 	<p>Causal Role (relationship to other factors and to the overall performance indicator) and Weight (Critical, Important, Somewhat Important, Not Very Important, Unknown):</p> <p>Causal Role: Staff shortages at community-based providers significantly impacts the availability of timely follow-up appointments for members after discharge. Staffing shortages may cause providers to close themselves to new admissions. This decreases the number of providers available for follow-up appointments. Staff shortages at case management providers may lead to wait lists for new cases. Members who need case management services may not be able to receive them in a timely manner. Without case management services, these members may have greater difficulty with remembering and keeping follow-up appointments.</p> <p>Weight: Critical</p> <p>Current and expected actionability: CBH is currently somewhat limited in our ability to impact staffing shortages at providers. However, CBH has convened an OP Access Workgroup on a monthly basis to address and improve OP service access for our members were possible. In CY2022, through the work of the OP Access Workgroup, CBH will continue to develop interventions aimed at increasing OP service access for our members, including for those returning to the community from hospitalization for mental illness.</p>
<p>Providers (4)</p> <p>4. Insufficient cross-provider communication:</p> <ul style="list-style-type: none"> k. OP and case management providers not returning calls from 	<p>Causal Role (relationship to other factors and to the overall performance indicator) and Weight (Critical, Important, Somewhat Important, Not Very Important, Unknown):</p>

RCA for MY 2020 Underperformance: FUH 7–Day Measure (All Ages)

<p>AIP provider regarding member aftercare needs in a timely manner</p> <ul style="list-style-type: none"> I. AIP providers not notifying existing OP/case management providers that member is in hospital m. AIP provider not ensuring that OP provider has received referral information 	<p>Causal Role: Insufficient provider communication between AIP and community-based providers impacts care coordination for the member after discharge. The OP provider may not return calls from the AIP provider that is trying to schedule a follow-up appointment. An AIP provider may not notify existing OP or case management providers that a member has been admitted to the hospital, which interferes with provider outreach to the member after discharge. AIP providers may not ensure that the OP provider has received the referral information. If the OP provider has not received the referral information, they would be unable to send a reminder message to the member for the follow-up appointment</p> <p>Weight: Important</p> <p>Current and expected actionability: CBH will continue interventions begun in CY2021 and will implement a new intervention in CY2022 to improve provider communication and collaboration.</p>
<p>Provisions/Social Determinants of Health (1)</p> <ul style="list-style-type: none"> 1. Poverty: <ul style="list-style-type: none"> a. Unstable living situation/homeless b. Lack of access to transportation 	<p>Causal Role (relationship to other factors and to the overall performance indicator) and Weight (Critical, Important, Somewhat Important, Not Very Important, Unknown):</p> <p>Causal Role: Poverty impacts a member’s ability to follow-up after discharge in several different ways. A member may have an unstable living situation or may be homeless. The member may be prioritizing obtaining stable housing over follow-up treatment after discharge from the hospital. Not having a stable living situation or being homeless may also place stressors on the individual, interfering with their ability to remember follow-up appointments. Poverty may also cause a lack of funds for transportation to follow-up appointments.</p> <p>Weight: Critical</p> <p>Current and expected actionability: Although CBH is limited in our ability to impact poverty, we will continue interventions begun in CY2021 and are planning interventions for CY2022 that will address the impacts that poverty may have on members’ ability to follow-up after discharge due to unstable living situations and lack of access to transportation.</p>
<p>Provisions/Social Determinants of Health (2)</p> <ul style="list-style-type: none"> 2. Lack of social/family support <ul style="list-style-type: none"> a. Family disengagement b. Family mental illness/substance abuse c. Family incarceration 	<p>Causal Role (relationship to other factors and to the overall performance indicator) and Weight (Critical, Important, Somewhat Important, Not Very Important, Unknown):</p> <p>Causal Role: Members may lack social/family support due to family disengagement in the member’s care, family mental illness or substance use that interferes with their ability to support the member in their continuing</p>

RCA for MY 2020 Underperformance: FUH 7–Day Measure (All Ages)

	<p>treatment, or family unavailability due to incarceration. Lack of this social or familial support may impact the member’s ability to remember and keep follow-up appointments.</p> <p>Weight: Important</p> <p>Current and expected actionability: CBH Clinical Care Managers currently work with AIP providers to ensure that family engagement is included in treatment and discharge planning. However, we are limited in our ability to impact the extent to which a member’s family chooses to or is able to be involved in the care and support of the member.</p>
<p>Provisions/Social Determinants of Health (3)</p> <p>3. DHS or Court/Justice involvement</p> <p>a. Lack of coordination of care after discharge</p>	<p>Causal Role (relationship to other factors and to the overall performance indicator) and Weight (Critical, Important, Somewhat Important, Not Very Important, Unknown):</p> <p>Causal Role: Members who have Philadelphia Department of Human Services or Justice involvement may not receive care coordination from these systems after discharge. As a result, they are less likely to remember and keep follow-up appointments.</p> <p>Weight: Not Very Important</p> <p>Current and expected actionability: CBH requires AIP providers to coordinate care with other systems with which the member is involved. However, CBH is limited in our ability to impact the extent to which those other systems coordinate care for our members.</p>
<p>Provisions/Social Determinants of Health (4)</p> <p>4. Racism</p>	<p>Causal Role (relationship to other factors and to the overall performance indicator) and Weight (Critical, Important, Somewhat Important, Not Very Important, Unknown):</p> <p>Causal Role: Racism may affect a member’s ability to remember and keep follow-up appointments for several reasons. Members may not get the care that they need and their symptoms may have been inadequately treated while in the hospital. They may not have been included in the discharge planning process and their after-care preferences may not have been considered. They may not have been included in medication decisions. These impacts of systemic racism on mental health treatment all raise the risk that the member will not be able to or willing to follow their discharge plan and continue with follow-up treatment. Racism also can result in trauma for the individual. Trauma affects an individual’s memory, making it more difficult to remember follow-up appointments, and may also exacerbate symptoms of mental illness, such as anxiety and depression. This also interferes with an individual’s ability</p>

RCA for MY 2020 Underperformance: FUH 7–Day Measure (All Ages)

	<p>to remember and keep follow-up appointments.</p> <p>Weight: Important</p> <p>Current and expected actionability: CBH is currently pursuing NCQA Multicultural Healthcare Distinction, which will address racial disparities in care for our members. However, the ability to impact racism within the scope and timeline of this QIP is limited.</p>
<p>Policies (1)</p> <ol style="list-style-type: none"> 1. Medicare licensing requirements <ol style="list-style-type: none"> a. Not enough OP providers accepting dual eligible members b. Providers that accept dual eligible members have long wait lists c. AIP providers limited in the number of OP providers who accept referrals for dual eligible members 	<p>Causal Role (relationship to other factors and to the overall performance indicator) and Weight (Critical, Important, Somewhat Important, Not Very Important, Unknown):</p> <p>Causal Role: There are a limited number of community-based providers that are Medicare licensed and able to accept referrals for members who are dual eligible. As a result, these providers frequently have long wait lists for new members and are unable to offer timely follow-up appointments.</p> <p>Weight: Not Very Important</p> <p>Current and expected actionability: CBH is very limited in our ability to impact the number of providers that choose to pursue Medicare licensing.</p>

Quality Improvement Plan for CY 2022

Rate Goal for 2022 (State the 2022 rate goal from your MY2020 FUH Goal Report here): 31.95%

The factors above can be thought of as barriers to improvement. For each barrier identified on the previous page (except those deemed Not Very Important), indicate the actions planned and/or actions taken since December 2021 to address that barrier. Actions should describe the Why (link back to factor discussion), What, How, Who, and When of the action. To the extent possible, actions should fit into your overall logic model of change (taking into account the interaction of factors) and align with Primary Contractor QIPs. Then, indicate implementation date of the action, along with a plan for how your MCO will monitor that the action is being faithfully implemented. For factors of Unknown weight, please describe your plan to test for and monitor its importance with respect to the performance indicator.

<u>Barrier</u>	<u>Action</u> Include those planned as well as already implemented.	<u>Implementation Date</u> Indicate start date (month, year) duration and frequency (e.g., Ongoing, Quarterly)	<u>Monitoring Plan</u> How will you know if this action is taking place? How will you know the action is having its intended effect? What will you measure and how often? Include what measurements will be used, as applicable.
<ul style="list-style-type: none"> ➤ Member not educated about need for follow-up ➤ Poor or inadequate discharge planning ➤ Lack of social/family support 	<p>Planned intervention: CBH will develop AIP Hospital Performance Standards that require:</p> <ul style="list-style-type: none"> • Member education about the need for and benefit of 	<p>September 2022 Quarterly</p>	<ul style="list-style-type: none"> • CBH has a standardized process for developing, approving, and communicating performance standards. • CBH already develops and will

RCA for MY 2020 Underperformance: FUH 7-Day Measure (All Ages)

<p>➤ Racism</p>	<p>follow-up treatment after discharge</p> <ul style="list-style-type: none"> • Inclusion of member in discharge planning process • Ensuring that member understands discharge plan • Inclusion of member in medication decisions and education about medications • Determining member and family communication preferences • Prescriber determining medication coverage • Provider submitting discharge plan to CBH in a timely manner • Engagement of family in member’s treatment and after-care • Treatment that is equitable and culturally competent 		<p>continue to develop quarterly performance reports for AIP hospitals that include 7-day FUH and shares those reports with providers in quarterly meetings.</p> <ul style="list-style-type: none"> • AIP performance reports will be stratified by race and ethnicity to determine if there are disparities. • Providers that have not met performance goals for the prior 4 quarters will be required to conduct a root cause analysis and submit a performance improvement plan. Providers will continue to be monitored quarterly for performance improvement.
<p>Co-occurring physical health disorders</p>	<p><u>Continuing intervention:</u> CBH will continue with interventions for our ICP initiative aimed at improving integrated care for members with co-occurring behavioral health and physical health conditions. Specifically, CBH will continue its Complex Case Management Team’s work with members with high AIP utilization and complex needs. The Team follows-up with and coordinates care for these members soon after discharge from AIP.</p>	<p>Ongoing Quarterly</p>	<ul style="list-style-type: none"> • The ICP team meets regularly to discuss associated interventions. • Referrals to the Complex Care Team are collected and monitored quarterly. • We will evaluate the impact of the ICP project on 7-day FUH by measuring quarterly 7-day FUH for members with a co-occurring physical health disorder diagnosis.
<p>Co-occurring SUD</p>	<p><u>Continuing intervention:</u> CBH will continue the Quality Improvement Learning Collaborative</p>	<p>Ongoing Quarterly</p>	<ul style="list-style-type: none"> • CBH is working with providers to develop and implement their own performance improvement

RCA for MY 2020 Underperformance: FUH 7-Day Measure (All Ages)

	<p>(QI LC) with SUD providers, as part of its Performance Improvement Project (PIP). One of the goals of the Learning Collaborative is to increase initiation and engagement in treatment for Black/African American members diagnosed with Opioid Use Disorder (OUD), including those being discharged from AIP.</p>		<p>plans for increasing initiation and engagement for Black/African American members with OUD in treatment, including those discharged from AIP.</p> <ul style="list-style-type: none"> • CBH will evaluate the impact of the QI LC on 7-day FUH through measuring: <ul style="list-style-type: none"> o Initiation in SUD treatment using the IET HEDIS measure o 7-day FUH for members with a secondary SUD diagnosis.
<p>Member not adherent to medication</p>	<p><u>Continuing interventions:</u> CBH will continue the work of its Clinical Practice Guidelines (CPG) Workgroup to improve prescribing practices and medication adherence, including:</p> <ul style="list-style-type: none"> • Updating of the Schizophrenia and Bipolar Disorder and Major Depressive Disorder CPGs, as needed. • Education of prescribers of prescribing best practices • Education of members about medication • Release updated Long-Acting Injectibles (LAI) toolkit 	<p>Ongoing Quarterly</p>	<ul style="list-style-type: none"> • CBH will evaluate the efficacy of these interventions quarterly by measuring 7-day FUH for members with a Schizophrenia, Bipolar Disorder, or Major Depressive Disorder Diagnosis
<p>AIP providers unable to bill for services after discharge</p>	<p><u>Continuing intervention:</u> CBH will continue its Value-based Payment (VBP) model to incentivize performance improvement on 7-day FUH. Performance bonuses paid to AIP providers could be used to offset the cost of checking in with members</p>	<p>Ongoing Quarterly</p>	<ul style="list-style-type: none"> • Providers will be evaluated quarterly by the VBP Committee for performance on 7-day FUH. • CBH will explore a tiered performance bonus with higher bonus payments for members at

RCA for MY 2020 Underperformance: FUH 7-Day Measure (All Ages)

	<p>within several days of discharge. CBH will explore the possibility of tiered bonuses based on predictive modeling to determine members at high risk of not following-up after discharge within 7 days.</p> <p><u>New intervention:</u> CBH will work in conjunction with DBHIDS to develop mental health “urgent care” centers for members to access if they have mental health issues that need to be addressed before they are able to receive their follow-up appointment.</p> <p>CBH will conduct a process improvement intervention aimed at improving access to peer services for members discharged from AIP who are not yet connected to an OP provider, to address any issues they may be having related to their symptoms or the ability to keep their follow-up. CBH will determine the barriers to access to peer services and will develop strategies to overcome these barriers.</p>	<p>September 2022 Monthly</p> <p>June 2022 Monthly</p>	<p>high risk for not following up within 7 days of AIP discharge.</p> <ul style="list-style-type: none"> • CBH holds ongoing meetings with DBHIDS to improve Philadelphia’s adult crisis continuum, including the development of behavioral health urgent care centers. Once developed, CBH will evaluate claims data to determine if the use of these urgent care centers resulted in an increase in 7-day FUH. • CBH will convene a workgroup that will meet monthly to conduct the peer services access improvement intervention. The workgroup will specifically target services that are available to members discharged from AIP that are not yet connected to an OP provider. • CBH will determine the impact of this process improvement intervention through surveying members annually.
<p>Staff shortages</p>	<p><u>Continuing intervention:</u> CBH will continue the work of the OP Access Workgroup to identify and address issues with timely appointment availability. The workgroup collects data from a monthly OP access survey that is completed by all OP providers.</p>	<p>Ongoing Monthly</p>	<ul style="list-style-type: none"> • CBH will continue to monitor responses to the monthly OP Access survey for all providers • Provider Operations compares responses on survey to information reported by providers to CBH. • Provider Operations has

RCA for MY 2020 Underperformance: FUH 7–Day Measure (All Ages)

	<p>Provider Operations uses the results of the survey to determine the availability of timely appointments in our OP network and to inform network adequacy decisions. Quality Management uses the results of the survey in comparison against information obtained through its “Secret Shopper” intervention, where a CBH staff member anonymously calls OP providers to ask about appointment wait times.</p>		<p>collected contingency plans from providers that are having staffing challenges</p> <ul style="list-style-type: none"> • Monthly Staff Vacancies Survey, which aims to help the organization better understand the impact of staffing challenges within our network • Quality Management conducts the Secret Shopper intervention and compares results to responses on the survey. Providers with responses to the Secret Shopper calls that don’t match responses on the survey are asked to submit a Root Cause Analysis and Action Plan to CBH.
<p>Insufficient cross-provider communication and care coordination</p>	<p><u>Continuing interventions:</u> CBH will continue the bi-annual AIP-OP provider forum convened in 2021. The forum is an opportunity for providers to discuss barriers to care coordination and develop solutions in a collaborative manner.</p> <p>CBH will continue to improve access to the Behavioral Health Case Management e-mail notification system. This system alerts Case Management providers if a member with whom they have an open authorization is admitted to AIP hospital for coordination of care. The CBH Behavioral Health Case Management Unit (BHCMU) surveys Case Management providers annually about their access to the e-mail notification system and uses the</p>	<p>May 2022 Bi-annually</p> <p>Ongoing Quarterly</p> <p>July 2022</p>	<ul style="list-style-type: none"> • CBH collects a feedback survey from providers to determine what parts of the forum were helpful and how the forum could be improved. This information will be used to inform subsequent forums. • Results of the annual Case Management E-mail Notification System Survey are used to determine whether system access improvement efforts are successful. • CBH reports quarterly on Case Management care coordination using 2 claims-based measures: <ol style="list-style-type: none"> 1. Case Management contact within 2 days of AIP hospital admission 2. Case Management contact within 7

RCA for MY 2020 Underperformance: FUH 7-Day Measure (All Ages)

	<p>results of the survey to inform system access improvement efforts. The BHCMU also meets with Case Management Supervisors and Director monthly for care coordination improvement efforts.</p> <p><u>New interventions:</u> CBH will convene a quarterly AIP-OP System Review Committee, comprised of key CBH staff and large AIP and OP providers to collaborate on system issues for members being discharged from AIP hospital.</p> <p>CBH will implement a case rate VBP model for Assertive Community Treatment (ACT) Teams that incentivizes care coordination for members discharged from AIP hospital.</p> <p>CBH will evaluate a partnership between an AIP and OP provider that will embed an OP “Discharge Lounge” within the AIP site. This will enable the member to connect with the OP treatment upon discharge, with the goal of increasing continuation of treatment after the member returns to the community.</p>	<p>Quarterly</p> <p>April 2022 Quarterly</p> <p>September 2022 Quarterly</p>	<p>days of AIP hospital discharge. The performance reports are shared with the BHCMU quarterly to evaluate whether care coordination is improving.</p> <ul style="list-style-type: none"> • CBH will obtain feedback quarterly from Committee members to determine the utility of the Committee meetings in improving care coordination and communication between AIP and OP providers. • CBH will evaluate ACT provider care coordination for members being discharged from AIP hospital quarterly with a claims-based measure: ACT contact within 7 days of AIP hospital discharge. Performance data will be shared with providers quarterly and performance summaries will be reviewed by the VBP Committee quarterly. • CBH will collect data on members connected to the OP provider monthly and will evaluate quarterly whether members who chose to engage with the Discharge Lounge had significantly higher 7-FUH rates than those discharged from the AIP provider who did not choose to engage in the program.
<p>Poverty</p>	<p><u>New Intervention:</u> CBH will implement the agreement</p>	<p>April 2022</p>	<ul style="list-style-type: none"> • CBH will collect data from the

RCA for MY 2020 Underperformance: FUH 7-Day Measure (All Ages)			
	with the Community Based Organization (CBO) to receive referrals from AIP providers for members who screen positive at admission for unstable living situations and transportation needs. The CBO will connect with the member soon after discharge to connect the member to needed resources.	Quarterly	CBO monthly on referrals received from AIP providers, resources provided, and time working with member. CBH will evaluate whether members receiving resources from the CBO had significantly higher 7-day FUH rates than members who chose not to receive resources from the CBO.

Table 6.3: CBH RCA and CAP for the FUH 30-Day Measure (All Ages)

RCA for MY 2020 Underperformance: FUH 30-Day Measure (All Ages)																																													
<p><u>Discussion of Analysis (What data and analytic methods were employed to identify and link factors contributing to underperformance in the performance indicator in question?):</u></p> <p>Community Behavioral Health (CBH) analyzed its 30-day follow-up after hospitalization for mental illness (FUH) HEDIS data for measurement year (MY) 2020. There were not statistically significant differences between Hispanic/Latino members and Non-Hispanic/Latino members. There were, however, statistically significant differences between 30-day FUH for members aged 6-17 and members aged 18-64 and between members identifying as male and those identifying as female. Although there were no disparities found between rates for Black/African American and White members, Black/African American members had a statistically significantly lower 30-day FUH rate than all racial groups combined. As Black/African American members constituted 63% of all discharges in MY 2020, some QIP interventions will focus on addressing barriers to 30-day FUH specifically for adult Black/African American members. The detailed rates are in the column to the right.</p> <p>CBH surveyed stakeholders, which included CBH Clinical, Provider Operations, Medical Affairs, and Quality Management Staff, CBH providers, and CBH members and families, to determine barriers to and change strategies for 30-day FUH. Barriers that were identified were grouped into categories in an Affinity Diagram, which was then used to determine root causes and develop a Fishbone Diagram. Both are embedded in the column to the right.</p>	<p><u>Describe here your overall findings. Please explain the underperformance and any racial (White vs non-White cohorts) and/or ethnic disparities using some kind of model linking causes and effects (logic model of change). The linkages and overall conclusions should be empirically supported whenever possible. Logic Model of Change templates, Causal Loop Diagrams, and similar best (RCA) practices are encouraged:</u></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Group</th> <th>30D FUH Num</th> <th>30D FUH Denom</th> <th>30D FUH Rate</th> </tr> </thead> <tbody> <tr> <td>All</td> <td>2,390</td> <td>6,286</td> <td>38.00%</td> </tr> <tr> <td>Age 6-17</td> <td>547</td> <td>893</td> <td>61.30%</td> </tr> <tr> <td>Age 18-64</td> <td>1,818</td> <td>5,231</td> <td>34.80%*</td> </tr> <tr> <td>Black/African Am.</td> <td>1,459</td> <td>3,970</td> <td>36.8%*</td> </tr> <tr> <td>Asian</td> <td>68</td> <td>137</td> <td>49.6%</td> </tr> <tr> <td>Other</td> <td>344</td> <td>766</td> <td>44.9%</td> </tr> <tr> <td>White</td> <td>513</td> <td>1,399</td> <td>36.7%</td> </tr> <tr> <td>Hispanic/Latino</td> <td>351</td> <td>785</td> <td>44.7%</td> </tr> <tr> <td>Female</td> <td>1,191</td> <td>2,972</td> <td>40.1%</td> </tr> <tr> <td>Male</td> <td>1,199</td> <td>3,314</td> <td>36.2%*</td> </tr> </tbody> </table> <p>*Statistically significant difference at p<.05</p>	Group	30D FUH Num	30D FUH Denom	30D FUH Rate	All	2,390	6,286	38.00%	Age 6-17	547	893	61.30%	Age 18-64	1,818	5,231	34.80%*	Black/African Am.	1,459	3,970	36.8%*	Asian	68	137	49.6%	Other	344	766	44.9%	White	513	1,399	36.7%	Hispanic/Latino	351	785	44.7%	Female	1,191	2,972	40.1%	Male	1,199	3,314	36.2%*
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Age 18-64	1,818	5,231	34.80%*																																										
Black/African Am.	1,459	3,970	36.8%*																																										
Asian	68	137	49.6%																																										
Other	344	766	44.9%																																										
White	513	1,399	36.7%																																										
Hispanic/Latino	351	785	44.7%																																										
Female	1,191	2,972	40.1%																																										
Male	1,199	3,314	36.2%*																																										

RCA for MY 2020 Underperformance: FUH 30-Day Measure (All Ages)

CBH identified existing interventions for each of the root causes and where there are gaps in existing interventions necessary to address root causes. CBH then used a prioritization matrix to prioritize the development of new interventions based on the change strategies from the survey. This prioritization matrix is at right. CBH will move forward with developing any intervention that scored higher than 20 on the prioritization matrix. CBH will also continue interventions from Calendar Year (CY)2021 that address barriers with a Critical or Important Causal Role.

CBH used the information from the RCA and prioritization matrix to develop the logic model of change for 30-day FUH for interventions that will be undertaken during CY2022, which can be found at right. The logic model of change includes interventions from CY2021 that are being continued in CY2022.

List out below the factors you identified in your RCA. Insert more rows as needed (e.g., if there are three provider factors to be addressed, insert another row, and split for the second column, to include the third factor).

Discuss each factor's role in contributing to underperformance and any disparities (as defined above) in the performance indicator in question. Assess its "causal weight" as well as your MCO's current and expected capacity to address it ("actionability").

People/Members (1)

- 6. Member not educated about need for follow-up:
 - d. Lack of member insight about chronic nature of mental illness
 - e. Members admitted on a 302 and unwilling to continue treatment after discharge
 - f. Member treatment fatigue

Causal Role (relationship to other factors and to the overall performance indicator) and Weight (Critical, Important, Somewhat Important, Not Very Important, Unknown):

Causal Role: Members may lack insight into the chronic nature of mental illness and may not understand the need for and benefit of continued treatment after discharge. Members may have been admitted to the hospital on a 302 (involuntarily) and may be resistant to receiving continued treatment after discharge, not understanding the need for follow-up treatment. Members may experience "treatment fatigue" and become overwhelmed by many treatment appointments and unmotivated to continue with treatment after discharge.

Weight: Critical

Current and expected actionability: CBH Clinical Care Managers currently work with Acute Inpatient (AIP) providers to determine whether providers are educating members regarding need for continuing treatment after discharge and the chronic nature of mental illness. Through the implementation of planned interventions, CBH will be better able to ensure that member education is taking place during the discharge planning process.

RCA for MY 2020 Underperformance: FUH 30-Day Measure (All Ages)

People/Members (2)

1. Co-occurring physical health disorders
 - a. Member prioritizes physical healthcare
 - b. Physical health conditions interfere with member’s ability to follow-up with mental health treatment after discharge

Causal Role (relationship to other factors and to the overall performance indicator) and Weight (Critical, Important, Somewhat Important, Not Very Important, Unknown):

Causal Role: Members with co-occurring physical health disorders may prioritize treatment for their physical health disorders after discharge, which may interfere with their ability to continue with their behavioral health treatment soon after discharge. Their physical health disorders may also interfere with their ability to follow-up with their behavioral health treatment, especially their ability to remember and travel to follow-up appointments. Physical health conditions may also exacerbate mental health symptoms, which could in turn impact a member’s ability to remember and keep follow-up appointments.

Weight: Important

Current and expected actionability: CBH currently addresses barriers to community-based treatment for members with co-occurring physical health conditions through its Integrated Care Plan (ICP) initiative and will continue to do so in CY2022. CBH will also work to ensure that physical health conditions are addressed by AIP providers during the discharge planning process.

People/Members (3)

2. Co-occurring substance use disorder (SUD)
 - a. Substance use interfering with member’s ability to follow-up with mental health treatment after discharge

Causal Role (relationship to other factors and to the overall performance indicator) and Weight (Critical, Important, Somewhat Important, Not Very Important, Unknown):

Causal Role: The effects of SUD may interfere with a member’s ability to remember and keep follow-up appointments. SUD may also exacerbate symptoms of mental illness, which in turn could impact a member’s ability to remember and keep follow-up appointments.

Weight: Critical

Current and expected actionability: CBH currently addresses barriers to community-based treatment for members with co-occurring mental health and SUD through its Performance Improvement Plan (PIP) initiative and will continue to do so in CY2022.

People/Members (4)

3. Members are not adherent to medication

Causal Role (relationship to other factors and to the overall performance indicator) and Weight (Critical, Important, Somewhat Important, Not Very Important, Unknown):

Causal Role: If members are not included in decisions about medication or educated about medication side effects and the time it may take for medication to become effective, they may discontinue taking their medication

RCA for MY 2020 Underperformance: FUH 30-Day Measure (All Ages)

	<p>if unexpected side effects occur or if medication takes longer to become effective than expected. Discontinuing medication will lead to an increase in symptoms, which may interfere with the member’s ability to remember and keep follow-up appointments.</p> <p>Weight: Critical</p> <p>Current and expected actionability: CBH can impact member adherence to medication through member and prescriber education and creation of prescribing best practice guidelines.</p>
<p>Providers (1)</p> <p>1. AIP providers unable to bill for services after discharge</p>	<p>Causal Role (relationship to other factors and to the overall performance indicator) and Weight (Critical, Important, Somewhat Important, Not Very Important, Unknown):</p> <p>Causal Role: Because AIP providers are not reimbursed by CBH for services after a member is discharged, they may be reluctant to provide services after discharge such as a reminder phone call or message about follow-up appointments for the member. If a member doesn’t receive a reminder about follow-up appointments, they may not remember details about the appointment. Members may also be experiencing symptoms from their mental health conditions that are not being addressed after discharge and before their follow-up appointment, which may interfere with the member’s ability to remember and keep follow-up appointments. The member may also be experiencing medication side effects that are not being addressed and which may interfere with the member’s ability to remember and keep follow-up appointments.</p> <p>Weight: Somewhat Important</p> <p>Current and expected actionability: CBH is limited in our ability to impact Medicaid billing rules for AIP providers. However, we have planned interventions in CY2022 that may help to offset the cost of following up with members after discharge for AIP providers.</p>
<p>Providers (2)</p> <p>2. Poor or inadequate discharge planning:</p> <ul style="list-style-type: none"> a. AIP providers referring members to walk-in appointments when not appropriate for member. b. AIP providers not including member in discharge planning process. c. AIP providers not ensuring that member understands discharge plan and need for follow-up. 	<p>Causal Role (relationship to other factors and to the overall performance indicator) and Weight (Critical, Important, Somewhat Important, Not Very Important, Unknown):</p> <p>Causal Role: Poor or inadequate discharge planning by the AIP provider may have many impacts on a member’s ability to follow-up after discharge. AIP providers may refer members to walk-in appointments with OP providers when that is not appropriate to meet that member’s needs. AIP providers may not be including the member in the discharge planning process, which results</p>

RCA for MY 2020 Underperformance: FUH 30-Day Measure (All Ages)

- d. Member not involved in medication decisions
- e. Providers not determining member and family communication preferences (voice vs. text) prior to discharge
- f. Prescriber not checking insurance to determine medication coverage
- g. Provider not submitting discharge plan to CBH in a timely manner

in a discharge plan that is less likely to include member preferences such as choice of preferred follow-up provider and provider location. The AIP provider may not be ensuring that the member understands the discharge plan, including that a follow-up appointment has been made and the details of that appointment. The AIP provider may not be educating the member on the need for and benefits of continued treatment after discharge. The AIP provider may not be including the member in medication decisions and educating the member about side effects and time to medication effectiveness. If a member experiences medication side effects or does not understand the time to medication effectiveness, the member may discontinue taking their medication after discharge. This may lead to an increase in mental illness symptoms, which may in turn interfere with the member's ability to remember and keep follow-up appointments. The AIP provider may not determine member and family communication preferences prior to discharge. The AIP provider may call to remind the member of the follow-up appointment. If this is not the preferred communication method, the member may not answer the call and will not receive the follow-up appointment reminder. AIP providers may also not be submitting discharge plans to CBH in a timely manner, preventing Clinical Care Managers from being able to coordinate after-care for some members in a timely manner.

Weight: Critical

Current and expected actionability: CBH Clinical Care Managers currently work with AIP providers to determine whether timely discharge planning that follows best practices is taking place with members. Through the implementation of planned interventions, CBH will be better able to ensure that discharge planning that follows best practices is occurring.

Providers (3)

- 3. Staff shortages:
 - h. insufficient availability of timely outpatient (OP) appointments
 - i. Staffing shortages may cause providers to not accept new intakes
 - j. Case management provider unable to open new case due to wait list

Causal Role (relationship to other factors and to the overall performance indicator) and Weight (Critical, Important, Somewhat Important, Not Very Important, Unknown):

Causal Role: Staff shortages at community-based providers significantly impacts the availability of timely follow-up appointments for members after discharge. Staffing shortages may cause providers to close themselves to new admissions. This decreases the number of providers available for follow-up appointments. Staff shortages at case management providers may lead to wait lists for new cases. Members who need case management services may not be able to receive them in a timely manner. Without case management services, these members may have greater difficulty with remembering and keeping

RCA for MY 2020 Underperformance: FUH 30-Day Measure (All Ages)

	<p>follow-up appointments.</p> <p>Weight: Critical</p> <p>Current and expected actionability: CBH is currently somewhat limited in our ability to impact staffing shortages at providers. However, CBH has convened an OP Access Workgroup on a monthly basis to address and improve OP service access for our members were possible. In CY2022, through the work of the OP Access Workgroup, CBH will continue to develop interventions aimed at increasing OP service access for our members, including for those returning to the community from hospitalization for mental illness.</p>
<p>Providers (4)</p> <p>4. Insufficient cross-provider communication:</p> <ul style="list-style-type: none"> k. OP and case management providers not returning calls from AIP provider regarding member aftercare needs in a timely manner l. AIP providers not notifying existing OP/case management providers that member is in hospital m. AIP provider not ensuring that OP provider has received referral information 	<p>Causal Role (relationship to other factors and to the overall performance indicator) and Weight (Critical, Important, Somewhat Important, Not Very Important, Unknown):</p> <p>Causal Role: Insufficient provider communication between AIP and community-based providers impacts care coordination for the member after discharge. The OP provider may not return calls from the AIP provider that is trying to schedule a follow-up appointment. An AIP provider may not notify existing OP or case management providers that a member has been admitted to the hospital, which interferes with provider outreach to the member after discharge. AIP providers may not ensure that the OP provider has received the referral information. If the OP provider has not received the referral information, they would be unable to send a reminder message to the member for the follow-up appointment</p> <p>Weight: Important</p> <p>Current and expected actionability: CBH will continue interventions begun in CY2021 and will implement a new intervention in CY2022 to improve provider communication and collaboration.</p>
<p>Provisions/Social Determinants of Health (1)</p> <p>1. Poverty:</p> <ul style="list-style-type: none"> a. Unstable living situation/homeless b. Lack of access to transportation 	<p>Causal Role (relationship to other factors and to the overall performance indicator) and Weight (Critical, Important, Somewhat Important, Not Very Important, Unknown):</p> <p>Causal Role: Poverty impacts a member’s ability to follow-up after discharge in several different ways. A member may have an unstable living situation or may be homeless. The member may be prioritizing obtaining stable housing over follow-up treatment after discharge from the hospital. Not having a stable living situation or being homeless may also place stressors on the individual, interfering with their ability to remember follow-up appointments. Poverty may also cause a lack of funds for transportation to follow-up appointments.</p>

RCA for MY 2020 Underperformance: FUH 30-Day Measure (All Ages)

	<p>Weight: Critical</p> <p>Current and expected actionability: Although CBH is limited in our ability to impact poverty, we will continue interventions begun in CY2021 and are planning interventions for CY2022 that will address the impacts that poverty may have on members' ability to follow-up after discharge due to unstable living situations and lack of access to transportation.</p>
<p>Provisions/Social Determinants of Health (2)</p> <ol style="list-style-type: none"> 2. Lack of social/family support <ol style="list-style-type: none"> a. Family disengagement b. Family mental illness/substance abuse c. Family incarceration 	<p>Causal Role (relationship to other factors and to the overall performance indicator) and Weight (Critical, Important, Somewhat Important, Not Very Important, Unknown):</p> <p>Causal Role: Members may lack social/family support due to family disengagement in the member's care, family mental illness or substance use that interferes with their ability to support the member in their continuing treatment, or family unavailability due to incarceration. Lack of this social or familial support may impact the member's ability to remember and keep follow-up appointments.</p> <p>Weight: Important</p> <p>Current and expected actionability: CBH Clinical Care Managers currently work with AIP providers to ensure that family engagement is included in treatment and discharge planning. However, we are limited in our ability to impact the extent to which a member's family chooses to or is able to be involved in the care and support of the member.</p>
<p>Provisions/Social Determinants of Health (3)</p> <ol style="list-style-type: none"> 3. DHS or Court/Justice involvement <ol style="list-style-type: none"> a. Lack of coordination of care after discharge 	<p>Causal Role (relationship to other factors and to the overall performance indicator) and Weight (Critical, Important, Somewhat Important, Not Very Important, Unknown):</p> <p>Causal Role: Members who have Philadelphia Department of Human Services or Justice involvement may not receive care coordination from these systems after discharge. As a result, they are less likely to remember and keep follow-up appointments.</p> <p>Weight: Not Very Important</p> <p>Current and expected actionability: CBH requires AIP providers to coordinate care with other systems with which the member is involved. However, CBH is limited in our ability to impact the extent to which those other systems coordinate care for our members.</p>
<p>Provisions/Social Determinants of Health (4)</p> <ol style="list-style-type: none"> 4. Racism 	<p>Causal Role (relationship to other factors and to the overall performance indicator) and Weight (Critical, Important, Somewhat Important, Not Very Important, Unknown):</p>

RCA for MY 2020 Underperformance: FUH 30-Day Measure (All Ages)

	<p>Important, Unknown): Causal Role: Racism may affect a member’s ability to remember and keep follow-up appointments for several reasons. Members may not get the care that they need and their symptoms may have been inadequately treated while in the hospital. They may not have been included in the discharge planning process and their after-care preferences may not have been considered. They may not have been included in medication decisions. These impacts of systemic racism on mental health treatment all raise the risk that the member will not be able to or willing to follow their discharge plan and continue with follow-up treatment. Racism also can result in trauma for the individual. Trauma affects an individual’s memory, making it more difficult to remember follow-up appointments, and may also exacerbate symptoms of mental illness, such as anxiety and depression. This also interferes with an individual’s ability to remember and keep follow-up appointments.</p> <p>Weight: Important</p> <p>Current and expected actionability: CBH is currently pursuing NCQA Multicultural Healthcare Distinction, which will address racial disparities in care for our members. However, the ability to impact racism within the scope and timeline of this QIP is limited.</p>
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<p>Policies (1)</p> <ol style="list-style-type: none"> 1. Medicare licensing requirements <ol style="list-style-type: none"> a. Not enough OP providers accepting dual eligible members b. Providers that accept dual eligible members have long wait lists c. AIP providers limited in the number of OP providers who accept referrals for dual eligible members 	<p>Causal Role (relationship to other factors and to the overall performance indicator) and Weight (Critical, Important, Somewhat Important, Not Very Important, Unknown): Causal Role: There are a limited number of community-based providers that are Medicare licensed and able to accept referrals for members who are dual eligible. As a result, these providers frequently have long wait lists for new members and are unable to offer timely follow-up appointments.</p> <p>Weight: Not Very Important</p> <p>Current and expected actionability: CBH is very limited in our ability to impact the number of providers that choose to pursue Medicare licensing</p>
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Quality Improvement Plan for CY 2022

Rate Goal for 2022 (State the 2022 rate goal from your MY2020 FUH Goal Report here): 31.95%

The factors above can be thought of as barriers to improvement. For each barrier identified on the previous page (except those deemed Not Very Important), indicate the actions planned and/or actions taken since December 2021 to address that barrier. Actions should describe the Why (link back to factor discussion), What, How, Who, and When of the action. To the extent possible, actions should fit into your overall logic model of change (taking into account the interaction of factors) and align with Primary Contractor QIPs. Then, indicate implementation date of the action, along with a plan for how your MCO will monitor that the action is being faithfully implemented. For factors of Unknown weight, please describe your plan to test for and monitor its importance with respect to the

RCA for MY 2020 Underperformance: FUH 30-Day Measure (All Ages)

performance indicator.

<u>Barrier</u>	<u>Action</u> <i>Include those planned as well as already implemented.</i>	<u>Implementation Date</u> <i>Indicate start date (month, year) duration and frequency (e.g., Ongoing, Quarterly)</i>	<u>Monitoring Plan</u> <i>How will you know if this action is taking place? How will you know the action is having its intended effect? What will you measure and how often? Include what measurements will be used, as applicable.</i>
<ul style="list-style-type: none"> ➤ Member not educated about need for follow-up ➤ Poor or inadequate discharge planning ➤ Lack of social/family support ➤ Racism 	<p><u>Planned intervention:</u> CBH will develop AIP Hospital Performance Standards that require:</p> <ul style="list-style-type: none"> • Member education about the need for and benefit of follow-up treatment after discharge • Inclusion of member in discharge planning process • Ensuring that member understands discharge plan • Inclusion of member in medication decisions and education about medications • Determining member and family communication preferences • Prescriber determining medication coverage • Provider submitting discharge plan to CBH in a timely manner • Engagement of family in member’s treatment and after-care • Treatment that is equitable and culturally competent 	<p>September 2022 Quarterly</p>	<ul style="list-style-type: none"> • CBH has a standardized process for developing, approving, and communicating performance standards. • CBH already develops and will continue to develop quarterly performance reports for AIP hospitals that include 30-day FUH and shares those reports with providers in quarterly meetings. • AIP performance reports will be stratified by race and ethnicity to determine if there are disparities. • Providers that have not met performance goals for the prior 4 quarters will be required to conduct a root cause analysis and submit a performance improvement plan. Providers will continue to be monitored quarterly for performance improvement.
<p>Co-occurring physical health disorders</p>	<p><u>Continuing intervention:</u> CBH will continue with interventions for our</p>	<p>Ongoing Quarterly</p>	<ul style="list-style-type: none"> • The ICP team meets regularly to discuss associated interventions.

RCA for MY 2020 Underperformance: FUH 30-Day Measure (All Ages)

	<p>ICP initiative aimed at improving integrated care for members with co-occurring behavioral health and physical health conditions. Specifically, CBH will continue its Complex Case Management Team’s work with members with high AIP utilization and complex needs. The Team follows-up with and coordinates care for these members soon after discharge from AIP.</p>		<ul style="list-style-type: none"> • Referrals to the Complex Care Team are collected and monitored quarterly. • We will evaluate the impact of the ICP project on 30-day FUH by measuring quarterly 30-day FUH for members with a co-occurring physical health disorder diagnosis.
<p>Co-occurring SUD</p>	<p><u>Continuing intervention:</u> CBH will continue the Quality Improvement Learning Collaborative (QI LC) with SUD providers, as part of its Performance Improvement Project (PIP). One of the goals of the Learning Collaborative is to increase initiation and engagement in treatment for Black/African American members diagnosed with Opioid Use Disorder (OUD), including those being discharged from AIP.</p>	<p>Ongoing Quarterly</p>	<ul style="list-style-type: none"> • CBH is working with providers to develop and implement their own performance improvement plans for increasing initiation and engagement for Black/African American members with OUD in treatment, including those discharged from AIP. • CBH will evaluate the impact of the QI LC on 30-day FUH through measuring: <ul style="list-style-type: none"> o Initiation in SUD treatment using the IET HEDIS measure o 30-day FUH for members with a secondary SUD diagnosis.
<p>Member not adherent to medication</p>	<p><u>Continuing interventions:</u> CBH will continue the work of its Clinical Practice Guidelines (CPG) Workgroup to improve prescribing practices and medication adherence, including:</p> <ul style="list-style-type: none"> • Updating of the Schizophrenia and Bipolar Disorder and Major Depressive Disorder CPGs, as 	<p>Ongoing Quarterly</p>	<ul style="list-style-type: none"> • CBH will evaluate the efficacy of these interventions quarterly by measuring 30-day FUH for members with a Schizophrenia, Bipolar Disorder, or Major Depressive Disorder Diagnosis

RCA for MY 2020 Underperformance: FUH 30-Day Measure (All Ages)

	<p>needed.</p> <ul style="list-style-type: none"> • Education of prescribers of prescribing best practices • Education of members about medication • Release updated Long-Acting Injectables (LAI) toolkit 		
<p>AIP providers unable to bill for services after discharge</p>	<p><u>Continuing intervention:</u> CBH will continue its Value-based Payment (VBP) model to incentivize performance improvement on 30-day FUH. Performance bonuses paid to AIP providers could be used to offset the cost of checking in with members within several days of discharge. CBH will explore the possibility of tiered bonuses based on predictive modeling to determine members at high risk of not following-up after discharge within 7 days.</p> <p><u>New intervention:</u> CBH will work in conjunction with DBHIDS to develop mental health “urgent care” centers for members to access if they have mental health issues that need to be addressed before they are able to receive their follow-up appointment.</p> <p>CBH will conduct a process improvement intervention aimed at improving access to peer services for members discharged from AIP who are not yet connected to an OP</p>	<p>Ongoing Quarterly</p> <p>September 2022 Monthly</p> <p>June 2022 Monthly</p>	<ul style="list-style-type: none"> • Providers will be evaluated quarterly by the VBP Committee for performance on 30-day FUH. • CBH will explore a tiered performance bonus with higher bonus payments for members at high risk for not following up within 30 days of AIP discharge. • CBH holds ongoing meetings with DBHIDS to improve Philadelphia’s adult crisis continuum, including the development of behavioral health urgent care centers. Once developed, CBH will evaluate claims data to determine if the use of these urgent care centers resulted in an increase in 30-day FUH. • CBH will convene a workgroup that will meet monthly to conduct the peer services access improvement intervention. The workgroup will specifically target services that are available to

RCA for MY 2020 Underperformance: FUH 30-Day Measure (All Ages)

	<p>provider, to address any issues they may be having related to their symptoms or the ability to keep their follow-up. CBH will determine the barriers to access to peer services and will develop strategies to overcome these barriers.</p>		<p>members discharged from AIP that are not yet connected to an OP provider.</p> <ul style="list-style-type: none"> • CBH will determine the impact of this process improvement intervention through surveying members annually.
<p>Staff shortages</p>	<p><u>Continuing intervention:</u> CBH will continue the work of the OP Access Workgroup to identify and address issues with timely appointment availability. The workgroup collects data from a monthly OP access survey that is completed by all OP providers. Provider Operations uses the results of the survey to determine the availability of timely appointments in our OP network and to inform network adequacy decisions. Quality Management uses the results of the survey in comparison against information obtained through its “Secret Shopper” intervention, where a CBH staff member anonymously calls OP providers to ask about appointment wait times.</p>	<p>Ongoing Monthly</p>	<ul style="list-style-type: none"> • CBH will continue to monitor responses to the monthly OP Access survey for all providers • Provider Operations compares responses on survey to information reported by providers to CBH. • Provider Operations has collected contingency plans from providers that are having staffing challenges • Monthly Staff Vacancies Survey, which aims to help the organization better understand the impact of staffing challenges within our network • Quality Management conducts the Secret Shopper intervention and compares results to responses on the survey. Providers with responses to the Secret Shopper calls that don’t match responses on the survey are asked to submit a Root Cause Analysis and Action Plan to CBH.
<p>Insufficient cross-provider communication and care coordination</p>	<p><u>Continuing interventions:</u> CBH will continue the bi-annual AIP-OP provider forum convened in 2021. The forum is an opportunity for providers to discuss barriers to care coordination and develop</p>	<p>May 2022 Bi-annually</p>	<ul style="list-style-type: none"> • CBH collects a feedback survey from providers to determine what parts of the forum were helpful and how the forum could be improved. This information will be

RCA for MY 2020 Underperformance: FUH 30-Day Measure (All Ages)

	<p>solutions in a collaborative manner.</p> <p>CBH will continue to improve access to the Behavioral Health Case Management e-mail notification system. This system alerts Case Management providers if a member with whom they have an open authorization is admitted to AIP hospital for coordination of care. The CBH Behavioral Health Case Management Unit (BHCMU) surveys Case Management providers annually about their access to the e-mail notification system and uses the results of the survey to inform system access improvement efforts. The BHCMU also meets with Case Management Supervisors and Director monthly for care coordination improvement efforts.</p> <p><u>New interventions:</u> CBH will convene a quarterly AIP-OP System Review Committee, comprised of key CBH staff and large AIP and OP providers to collaborate on system issues for members being discharged from AIP hospital.</p> <p>CBH will implement a case rate VBP model for Assertive Community Treatment (ACT) Teams that incentivizes care coordination for members discharged from AIP hospital.</p>	<p>Ongoing Quarterly</p> <p>July 2022 Quarterly</p> <p>April 2022 Quarterly</p> <p>September 2022 Quarterly</p>	<p>used to inform subsequent forums.</p> <ul style="list-style-type: none"> • Results of the annual Case Management E-mail Notification System Survey are used to determine whether system access improvement efforts are successful. • CBH reports quarterly on Case Management care coordination using 2 claims-based measures: <ol style="list-style-type: none"> 1. Case Management contact within 2 days of AIP hospital admission 2. Case Management contact within 7 days of AIP hospital discharge. The performance reports are shared with providers and the BHCMU quarterly to evaluate whether care coordination is improving. • CBH will obtain feedback quarterly from Committee members to determine the utility of the Committee meetings in improving care coordination and communication between AIP and OP providers. • CBH will evaluate ACT provider care coordination for members being discharged from AIP hospital quarterly with a claims-based measure: ACT contact within 7 days of AIP hospital discharge. Performance data will be shared with providers
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RCA for MY 2020 Underperformance: FUH 30-Day Measure (All Ages)

	<p>CBH will evaluate a partnership between an AIP and OP provider that will embed an OP “Discharge Lounge” within the AIP site. This will enable the member to connect with the OP treatment upon discharge, with the goal of increasing continuation of treatment after the member returns to the community.</p>		<p>quarterly and performance summaries will be reviewed by the VBP Committee quarterly.</p> <ul style="list-style-type: none"> • CBH will collect data on members connected to the OP provider monthly and will evaluate quarterly whether members who chose to engage with the Discharge Lounge had significantly higher 30-FUH rates than those discharged from the AIP provider who did not choose to engage in the program.
<p>Poverty</p>	<p><u>New Intervention:</u> CBH will implement the agreement with the Community Based Organization (CBO) to receive referrals from AIP providers for members who screen positive at admission for unstable living situations and transportation needs. The CBO will connect with the member soon after discharge to connect the member to needed resources.</p>	<p>April 2022 Quarterly</p>	<ul style="list-style-type: none"> • CBH will collect data from the CBO monthly on referrals received from AIP providers, resources provided, and time working with member. CBH will evaluate whether members receiving resources from the CBO had significantly higher 30-day FUH rates than members who chose not to receive resources from the CBO.

VII: 2021 Strengths, Opportunities for Improvement and Recommendations

The section provides an overview of CBH's 2021 (MY 2020) performance in the following areas: structure and operations standards, performance improvement projects (no MY 2020 results to report), and PMs, with identified strengths and opportunities for improvement.

Strengths

- CBH successfully submitted a new PIP proposal

Opportunities for Improvement

- Review of compliance with standards conducted by the Commonwealth in RY 2018, RY 2019, and RY 2020 found CBH to be partially compliant with three sections associated with Medicaid Managed Care regulations.
 - CBH was partially compliant with 5 out of 9 categories within Compliance with Standards, including Enrollee Rights and Protections. The partially compliant categories are: 1) Availability of Services, 2) Coordination and continuity of care, 3) Coverage and Authorization of Services, and 4) Practice Guidelines, and 5) Provider selection.
 - CBH was partially compliant with the same-named category in Quality Assessment and Performance Improvement Program.
 - CBH was partially compliant with the single category Grievance and Appeal Systems within Grievance System.
- CBH's MY 2020 Readmission Within 30 Days of Inpatient Psychiatric Discharge rate did not meet the OMHSAS designated performance goal of 10.0%.
- CBH's MY 2020 HEDIS 7- and 30-Day Follow-Up After Hospitalization for Mental Illness rates (QI 1 and QI 2) for all age cuts examined (6–17, 18–64, and 6+ years) were statistically significantly lower (worse) compared to the MY 2020 HC BH (Statewide) rates.
- CBH's MY 2020 HEDIS 7- and 30-Day Follow-Up After Hospitalization for Mental Illness rates (QI 1 and QI 2) for ages 6+ years fell below the HEDIS 25th percentile.
- CBH's MY 2020 PA-Specific 7-Day (QI A) and (QI B) Follow-Up After Hospitalization for Mental Illness rates for the overall population were statistically significantly lower (worse) compared to the MY 2020 HC BH (Statewide) rates.
- CBH's MY 2020 Readmission Within 30 Days of Inpatient Psychiatric Discharge overall rate did not meet the OMHSAS designated performance goal of 10.0%.
- Review of compliance with standards conducted by the Commonwealth in RY 2018, RY 2019, and RY 2020 found CBH to be partially compliant with Network Adequacy.

Assessment of Quality, Timeliness, and Access

Responsibility for quality, timeliness, and access to health care services and supports is distributed among providers, payers, and oversight entities. Due to the BH carve-out within Pennsylvania's HealthChoices program, BH-MCOs and PH-MCOs operate under separate contracts, with BH-MCOs contracting with non-overlapping Primary Contractors, making this distribution even more complex. That said, when it comes to improving healthcare quality, timeliness, and access, the BH-MCO can focus on factors closer to its locus of control.

Table 7.1 details the full list of recommendations that are made for the MCO for each of the applicable EQR activities. For PIPs, the recommendations are based on the review that was conducted for the year. The PIP recommendations may include issues from prior years if they remain unresolved. Since 2020 was the baseline year, and the MCO met all requirements of the proposal stage, there are no recommendations applicable for this review period. For performance measures, the strengths and opportunities noted above in this section are determined for the current year, while recommendations are based on issues that were not only identified as opportunities for the current 2021 (MY 2020) year but were also identified as outstanding opportunities from 2020 (MY 2019).

Table 7.1: EQR Recommendations

Performance Improvement Projects (PIPs)		
Prevention, Early Detection, Treatment, and Recovery (PEDTAR) for Substance Use Disorders	No recommendations	Quality, Timeliness, Access
Performance Measures		
HEDIS Follow-Up After Hospitalization for Mental Illness rates	CBH has been working on RCAs and QIPs related to their FUH rates for a number of years now, and rates continue to fall. CBH’s new PIP centering on improving the continuum of SUD care, particularly for Black, non-Hispanic members with disproportionately low treatment initiation and engagement rates, can be expected to help improve FUH rates to the extent there is comorbidity between SUD and mental illness. Still, for MCOs like CBH facing systemic resistance to policy efforts with no clear culprit, logic models of change can be operationalized using tools and techniques, including system dynamics simulation modeling, to help identify potential leverage points for bringing about change at lower cost.	Timeliness, Access
PA Follow-Up After Hospitalization for Mental Illness rates	CBH has been working on RCAs and QIPs related to their FUH rates for a number of years now, and rates continue to fall. CBH’s new PIP centering on improving the continuum of SUD care, particularly for Black, non-Hispanic members with disproportionately low treatment initiation and engagement rates, can be expected to help improve FUH rates to the extent there is comorbidity between SUD and mental illness. Still, for MCOs like CBH facing systemic resistance to policy efforts with no clear culprit, logic models of change can be operationalized using tools and techniques, including system dynamics simulation modeling, to help identify potential leverage points for bringing about change at lower cost.	Timeliness, Access
Readmission Within 30 Days of Inpatient Psychiatric Discharge	CBH should continue to conduct additional root cause and barrier analyses to identify further impediments to successful transition to ambulatory care after an acute inpatient psychiatric discharge and then implement action and monitoring plans to further decrease their rates of readmission.	Timeliness, Access
Compliance with Medicaid Managed Care Regulations		
Availability of Services	CBH was noncompliant with two substandards concerned with monitoring the quality of services received by its members. CBH should conduct a root cause analysis of its member outcome- and network monitoring gaps. CBH’s Corrective Action Plan in this area has focused on ensuring: that Grievance related information is reported accurately; that each of its levels of care are monitored and accessed for Consumer Satisfaction; and that Consumer Satisfaction goals are specific and measurable.	Quality, Timeliness, Access
Coordination and continuity of care	CBH was partially compliant with documentation of correct application of medical necessity criteria in care management (CM). IPRO concurs with the recommendations made by OMHSAS: CBH should consider training and/or oversight with feedback of the denial letters, with focus on the clinical rationale specific to the individual; and CBH should consider initiating a continuous quality improvement process based on identified goals. Suggested action items include the following: Operationalize each of the “next steps” identified in the ACMR; Prioritize the next steps and establish timeline for implementation.	Quality, Access
Coverage and authorization of services	CBH was partially compliant due in part to with issues with denial letters. IPRO concurs with OMHSAS recommendations from existing correction action plans centering on the implementation of the denial letter	Quality, Access

	template and related standards.	
Practice guidelines	CBH was noncompliant with two substandards concerned with monitoring the quality of services received by its members. CBH should conduct a root cause analysis of its member outcome- and network monitoring gaps. CBH's Corrective Action Plan in this area has focused on ensuring: that Grievance related information is reported accurately; that each of its levels of care are monitored and accessed for Consumer Satisfaction; and that Consumer Satisfaction goals are specific and measurable.	Quality, Timeliness, Access
Provider selection	CBH should ensure that results of provider profiling be incorporated into recredentialing.	Quality
Quality assessment and performance improvement program	CBH was noncompliant with two substandards concerned with monitoring the quality of services received by its members. CBH should conduct a root cause analysis of its member outcome- and network monitoring gaps. CBH's Corrective Action Plan in this area has focused on ensuring: that Grievance related information is reported accurately; that each of its levels of care are monitored and accessed for Consumer Satisfaction; and that Consumer Satisfaction goals are specific and measurable.	Quality, Timeliness, Access

EQR: external quality review; MCO: managed care organization; N/A: not applicable.

VIII: Summary of Activities

Performance Improvement Projects

- CBH successfully submitted a new PIP proposal on the PEDTAR topic for 2020.

Performance Measures

- CBH reported all PMs and applicable quality indicators in 2020.

Medicaid Managed Care Regulations

- CBH was partially compliant with Standards, including Enrollee Rights and Protections, Quality Assessment and Performance Improvement Program, and Grievance System. As applicable, compliance review findings from RY 2020, RY 2019, and RY 2018 were used to make the determinations.

Quality Studies

- DHS and OMHSAS launched ICWC in 2020. For any of its members receiving ICWC services, CBH covered those services under a Prospective Payment System rate.

2020 Opportunities for Improvement MCO Response

- CBH provided a response to the opportunities for improvement issued in 2021.

2021 Strengths and Opportunities for Improvement

- Both strengths and opportunities for improvement were noted for CBH in 2021 (MY 2020). The BH-MCO will be required to prepare a response in 2022 for the noted opportunities for improvement.

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Appendices

Appendix A. Required PEPS Substandards Pertinent to BBA Regulations

Refer to **Table A.1** for required PEPS substandards pertinent to BBA Regulations.²⁵

Table A.1: Required PEPS Substandards Pertinent to BBA Regulations

BBA Category	PEPS Reference	PEPS Language
Assurances of adequate capacity and services 42 C.F.R. § 438.207	Substandard 1.1	<ul style="list-style-type: none"> • A complete listing of all contracted and credentialed providers. • Maps to demonstrate 30 minutes (20 miles) urban and 60 minutes (45 miles) rural access time frames (the mileage standard is used by DOH) for each level of care. • Group all providers by type of service (e.g., all outpatient providers should be listed on the same page or consecutive pages). • Excel or Access database with the following information: Name of Agency (include satellite sites); Address of Agency (and satellite sites) with zip codes; Level of Care (e.g., Partial Hospitalization, D&A Outpatient, etc.); Population served (e.g., adult, child and adolescent); Priority Population; Special Population.
	Substandard 1.2	100% of members given choice of two providers at each level of care within 30/60 miles urban/rural met.
	Substandard 1.4	BH-MCO has identified and addressed any gaps in provider network (e.g., cultural, special priority, needs pops or specific services).
	Substandard 1.5	BH-MCO has notified the Department of any drop in provider network. <ul style="list-style-type: none"> • Monitor provider turnover. • Network remains open where needed.
	Substandard 1.6	BH-MCO must require providers to notify BH-MCO when they are at capacity or not accepting any new enrollees.
Availability of Services 42 C.F.R § 438.206, 42 C.F.R. § 10(h)	Substandard 1.1	<ul style="list-style-type: none"> • A complete listing of all contracted and credentialed providers. • Maps to demonstrate 30 minutes (20 miles) urban and 60 minutes (45 miles) rural access time frames (the mileage standard is used by DOH) for each level of care. • Group all providers by type of service (e.g., all outpatient providers should be listed on the same page or consecutive pages). • Excel or Access database with the following information: Name of Agency (include satellite sites); Address of Agency (and satellite sites) with zip codes; Level of Care (e.g., Partial Hospitalization, D&A Outpatient, etc.); Population served (e.g., adult, child and adolescent); Priority Population; Special Population.
	Substandard 1.2	100% of members given choice of two providers at each level of care within 30/60 miles urban/rural met.
	Substandard 1.3	Provider Exception report submitted and approved when choice of two providers is not given.
	Substandard 1.4	BH-MCO has identified and addressed any gaps in provider network (e.g., cultural, special priority, needs pops or specific services).
	Substandard 1.5	BH-MCO has notified the Department of any drop in provider network. <ul style="list-style-type: none"> • Monitor provider turnover. • Network remains open where needed.
	Substandard 1.6	BH-MCO must require providers to notify BH-MCO when they are at capacity or not accepting any new enrollees.
	Substandard 1.7	Confirm FQHC providers.

BBA Category	PEPS Reference	PEPS Language	
	Substandard 23.1	BH-MCO has assessed if 5% requirement is applicable.	
	Substandard 23.2	BH-MCO phone answering procedures provide instruction for non-English members if 5% requirement is met.	
	Substandard 23.3	List of oral interpreters is available for non-English speakers.	
	Substandard 23.4	BH-MCO has provided documentation to confirm if Oral Interpretation services were provided for the calendar year being reviewed. The documentation includes the actual number of services, by contract, that were provided. (Oral Interpretation is identified as the action of listening to something in one language and orally translating into another language.)	
	Substandard 23.5	BH-MCO has provided documentation to confirm if Written Translation services were provided for the calendar year being reviewed. The documentation includes the actual number of services, by contract, that were provided. (Written Translation is defined as the replacement of a written text from one language into an equivalent written text in another language.)	
	Substandard 24.1	BH-MCO provider application includes information about handicapped accessibility.	
	Substandard 24.2	Provider network database contains required information for ADA compliance.	
	Substandard 24.3	BH-MCO phone answering uses TTY or PA telecommunication relay services.	
	Substandard 24.4	BH-MCO is able to access interpreter services.	
	Substandard 24.5	BH-MCO has the ability to accommodate people who are hard of hearing.	
	Substandard 24.6	BH-MCO can make alternate formats available upon request.	
	Substandard 28.1	Clinical/chart reviews reflect appropriate consistent application of medical necessity criteria and active care management that identify and address quality of care concerns.	
	Substandard 28.2	The medical necessity decision made by the BH-MCO Physician/Psychologist Advisor is supported by documentation in the denial record and reflects appropriate application of medical necessity criteria.	
	Substandard 93.1	The BH-MCO reports monitoring results for access to services (routine, urgent and emergent), provider network adequacy and penetration rates.	
	Substandard 93.2	The BH-MCO reports monitoring results for appropriateness of service authorization and inter-rater reliability.	
	Substandard 93.3	The BH-MCO reports monitoring results for: authorizations; complaint, grievance and appeal processes; rates of denials; and rates of grievances upheld or overturned.	
	Substandard 93.4	The BH-MCO reports monitoring results for treatment outcomes: readmission rates, follow up after hospitalization rates, and consumer satisfaction.	
	Confidentiality 42 C.F.R. § 438.224	Substandard 120.1	The County/BH-MCO uses the required reference files as evidenced through correct, complete and accurate encounter data.
	Coordination and continuity of care 42 C.F.R. § 438.208	Substandard 28.1	Clinical/chart reviews reflect appropriate consistent application of medical necessity criteria and active care management that identify and address quality of care concerns.
	Substandard 28.2	The medical necessity decision made by the BH-MCO	

BBA Category	PEPS Reference	PEPS Language
		Physician/Psychologist Advisor is supported by documentation in the denial record and reflects appropriate application of medical necessity criteria.
Coverage and authorization of services 42 C.F.R. Parts § 438.210(a–e), 42 C.F.R. § 441, Subpart B, and § 438.114	Substandard 28.1	Clinical/chart reviews reflect appropriate consistent application of medical necessity criteria and active care management that identify and address quality of care concerns.
	Substandard 28.2	The medical necessity decision made by the BH-MCO Physician/Psychologist Advisor is supported by documentation in the denial record and reflects appropriate application of medical necessity criteria.
	Substandard 72.1	Denial notices are issued to members according to required timeframes and use the required template language.
	Substandard 72.2	The content of the notices adhere to OMHSAS requirements (e.g., easy to understand and free from medical jargon; contains explanation of member rights and procedures for filing a grievance, requesting a DPW Fair Hearing, and continuation of services; contains name of contact person; contains specific member demographic information; contains specific reason for denial; contains detailed description of requested services, denied services, and any approved services if applicable; contains date denial decision will take effect).
Health information systems 42 C.F.R. § 438.242	Substandard 120.1	The County/BH-MCO uses the required reference files as evidenced through correct, complete and accurate encounter data.
Practice guidelines 42 C.F.R. § 438.236	Substandard 28.1	Clinical/chart reviews reflect appropriate consistent application of medical necessity criteria and active care management that identify and address quality of care concerns.
	Substandard 28.2	The medical necessity decision made by the BH-MCO Physician/Psychologist Advisor is supported by documentation in the denial record and reflects appropriate application of medical necessity criteria.
	Substandard 93.1	The BH-MCO reports monitoring results for access to services (routine, urgent and emergent), provider network adequacy and penetration rates.
	Substandard 93.2	The BH-MCO reports monitoring results for appropriateness of service authorization and inter-rater reliability.
	Substandard 93.3	The BH-MCO reports monitoring results for: authorizations; complaint, grievance and appeal processes; rates of denials; and rates of grievances upheld or overturned.
	Substandard 93.4	The BH-MCO reports monitoring results for treatment outcomes: readmission rates, follow up after hospitalization rates, and consumer satisfaction.
Provider selection 42 C.F.R. § 438.214	Substandard 10.1	100% of credentialed files should contain licensing or certification required by PA law, verification of enrollment in the MA and/or Medicare program with current MA provider agreement, malpractice/liability insurance, disclosure of past or pending lawsuits or litigation, board certification or eligibility BH-MCO on-site review, as applicable.
	Substandard 10.2	100% of decisions made within 180 days of receipt of application.
	Substandard 10.3	Recredentialing incorporates results of provider profiling.
Subcontractual relationships and	Substandard 99.1	The BH-MCO reports monitoring results for quality of individualized service plans and treatment planning.

BBA Category	PEPS Reference	PEPS Language
delegation 42 C.F.R. § 438.230	Substandard 99.2	The BH-MCO reports monitoring results for adverse incidents.
	Substandard 99.3	The BH-MCO reports monitoring results for collaboration and cooperation with member complaints, grievance and appeal procedures, as well as other medical and human services programs.
	Substandard 99.4	The BH-MCO reports monitoring results for administrative compliance.
	Substandard 99.5	The BH-MCO has implemented a provider profiling process which includes performance measures, baseline thresholds and performance goals.
	Substandard 99.6	Provider profiles and individual monitoring results are reviewed with providers.
	Substandard 99.7	Providers are evaluated based on established goals and corrective action taken as necessary.
	Substandard 99.8	The BH-MCO demonstrates that provider profiling results are incorporated into the network management strategy.
Quality assessment and performance improvement program 42 C.F.R. § 438.330	Substandard 91.1	The QM Program Description clearly outlines the BH-MCO QM structure.
	Substandard 91.2	The QM Program Description clearly outlines the BH-MCO QM content.
	Substandard 91.3	The QM Program Description includes the following basic elements: Performance improvement projects Collection and submission of performance measurement data Mechanisms to detect underutilization and overutilization of services Emphasis on, but not limited to, high volume/high-risk services and treatment, such as Behavioral Health Rehabilitation Services Mechanisms to assess the quality and appropriateness of care furnished to enrollees with special health needs.
	Substandard 91.4	The QM Work Plan includes: Objective Aspect of care/service Scope of activity Frequency Data source Sample size Responsible person Specific, measurable, attainable, realistic and timely performance goals, as applicable.
	Substandard 91.5	The QM Work Plan outlines the specific activities related to coordination and interaction with other entities, including but not limited to, Physical Health MCO's (PH-MCO).
	Substandard 91.6	The QM Work Plan outlines the formalized collaborative efforts (joint studies) to be conducted.
	Substandard 91.7	The QM Work Plan includes the specific monitoring activities conducted to evaluate the effectiveness of the services received by members: Access to services (routine, urgent and emergent), provider network adequacy, and penetration rates Appropriateness of service authorizations and inter-rater reliability Complaint, grievance and appeal processes; denial rates; and upheld and overturned grievance rates Treatment outcomes: readmission rate, follow-up after hospitalization rates, initiation and engagement rates, and consumer satisfaction.
	Substandard 91.8	The QM Work Plan includes a provider profiling process.
	Substandard 91.9	The QM Work Plan includes the specific monitoring activities conducted to evaluate access and availability to services: Telephone access and responsiveness rates Overall utilization patterns and trends including BHRS and other high volume/high risk services.
	Substandard 91.10	The QM Work Plan includes monitoring activities conducted to evaluate the quality and performance of the provider network: Quality

BBA Category	PEPS Reference	PEPS Language
		of individualized service plans and treatment planning Adverse incidents Collaboration and cooperation with member complaints, grievance, and appeal procedures as well as other medical and human services programs and administrative compliance.
	Substandard 91.11	The QM Work Plan includes a process for determining provider satisfaction with the BH-MCO.
	Substandard 91.12	The QM Work Plan outlines the specific performance improvement projects conducted to evaluate the BH-MCO's performance related to the following: Performance based contracting selected indicator: Mental Health; and, Substance Abuse External Quality Review: Follow up After Mental Health Hospitalization QM Annual Evaluation
	Substandard 91.13	The identified performance improvement projects must include the following: Measurement of performance using objective quality indicators Implementation of system interventions to achieve improvement in quality Evaluation of the effectiveness of the interventions Planning and initiation of activities for increasing or sustaining improvement Timeline for reporting status and results of each project to the Department of Human Services (DHS) Completion of each performance Improvement project in a reasonable time period to allow information on the success of performance improvement projects to produce new information on quality of care each year
	Substandard 91.14	The QM Work Plan outlines other performance improvement activities to be conducted based on the findings of the Annual Evaluation and any Corrective Actions required from previous reviews.
	Substandard 91.15	The Annual Program Evaluation evaluates the impact and effectiveness of the BH-MCO's quality management program. It includes an analysis of the BH-MCO's internal QM processes and initiatives, as outlined in the program description and the work plan.
	Substandard 93.1	The BH-MCO reports monitoring results for access to services (routine, urgent and emergent), provider network adequacy and penetration rates.
	Substandard 93.2	The BH-MCO reports monitoring results for appropriateness of service authorization and inter-rater reliability.
	Substandard 93.3	The BH-MCO reports monitoring results for: authorizations; complaint, grievance and appeal processes; rates of denials; and rates of grievances upheld or overturned.
	Substandard 93.4	The BH-MCO reports monitoring results for treatment outcomes: readmission rates, follow up after hospitalization rates, and consumer satisfaction.
	Substandard 98.1	The BH-MCO reports monitoring results for telephone access standard and responsiveness rates. Standard: Abandonment rate
	Substandard 98.2	The BH-MCO reports monitoring results for overall utilization patterns and trends, including BHRS service utilization and other high volume/high risk services patterns of over- or under-utilization. BH-MCO takes action to correct utilization problems, including patterns of over- and under-utilization.
	Substandard 98.3	The BH-MCO reports monitoring results for coordination with other service agencies and schools.
	Substandard 104.1	The BH-MCO must measure and report its performance using standard measures required by DHS.
	Substandard 104.2	The BH-MCO must submit data to DHS, as specified by DHS, that

BBA Category	PEPS Reference	PEPS Language
		enables the measurement of the BH-MCO's performance. QM program description must outline timeline for submission of QM program description, work plan, annual QM summary/evaluation, and member satisfaction including Consumer Satisfaction Team reports to DHS.
	Substandard 104.3	Performance Improvement Plans status reported within the established time frames.
	Substandard 104.4	The BH-MCO submitted the following within established timeframes: Annual Evaluation QM Program Description QM Work Plan Quarterly PEPS Reports
	Grievance and appeal systems 42 C.F.R. § 438 Parts 228, 402, 404, 406, 408, 410, 414, 416, 420, 424	Substandard 68.1
Substandard 68.2		Interview with the Complaint Manager(s) demonstrates effective oversight of the Complaint process.
Substandard 68.3		100% of Complaint Acknowledgement and Decision letters reviewed adhere to the established time lines. The required letter templates are utilized 100% of the time.
Substandard 68.4		Complaint Acknowledgement and Decision letters must be written in clear, simple language that includes each issue identified in the Member's Complaint and a corresponding explanation and reason for the decision(s).
Substandard 68.7		Complaint case files include documentation that Member rights and the Complaint process were reviewed with the Member.
Substandard 68.9		Complaint case files include documentation of any referrals of Complaint issues to Primary Contractor/BH-MCO committees for further review and follow-up. Evidence of subsequent corrective action and follow-up by the respective Primary Contractor/BH-MCO Committee must be available to the Complaint staff, either by inclusion in the Complaint case file or reference in the case file to where the documentation can be obtained for review.
Substandard 71.1		Interview with Grievance Coordinator demonstrates a clear understanding of the Grievance process, including how Grievance rights and procedures are made known to Members, BH-MCO staff and the provider network: <ul style="list-style-type: none"> • Internal • External • Expedited • Fair Hearing
Substandard 71.2		Interview with the Grievance Manager(s) demonstrates effective oversight of the Grievance process.
Substandard 71.3		100% of Grievance Acknowledgement and Decision letters reviewed adhere to the established time lines. The required letter templates are utilized 100% of the time.
Substandard 71.4		Grievance decision letters must be written in clear, simple language that includes a statement of all services reviewed and a specific

BBA Category	PEPS Reference	PEPS Language
		explanation and reason for the decision including the medical necessity criteria utilized.
	Substandard 71.7	Grievance case files include documentation that Member rights and the Grievance process were reviewed with the Member.
	Substandard 71.9	Grievance case files must include documentation of any referrals to Primary Contractor/BH-MCO committees for further review and follow-up. Evidence of subsequent corrective action and follow-up by the respective Primary Contractor/BH-MCO Committee must be available to the Grievance staff either by inclusion in the Grievance case file or reference in the case file to where the documentation can be obtained for review.
	Substandard 72.1	Denial notices are issued to members according to required timeframes and use the required template language.
	Substandard 72.2	The content of the notices adhere to OMHSAS requirements (e.g., easy to understand and free from medical jargon; contains explanation of member rights and procedures for filing a grievance, requesting a DPW Fair Hearing, and continuation of services; contains name of contact person; contains specific member demographic information; contains specific reason for denial; contains detailed description of requested services, denied services, and any approved services if applicable; contains date denial decision will take effect).

²⁵In 2019, five MCO-specific substandards related to complaints and grievances provisions (four of which covered BBA provisions) were retired and replaced with eight new substandards related to complaints and grievances. Four of the substandards cover BBA provisions and four are OMHSAS-specific.

Appendix B. OMHSAS-Specific PEPS Substandards

Refer to **Table B.1** for OMHSAS-specific PEPS substandards.²⁶

Table B.1: OMHSAS-Specific PEPS Substandards

Category	PEPS Reference	PEPS Language
Care Management		
Care Management (CM) Staffing	Substandard 27.7	Other: Significant onsite review findings related to Standard 27.
Longitudinal Care Management (and Care Management Record Review)	Substandard 28.3	Other: Significant onsite review findings related to Standard 28.
Complaints and Grievances		
Complaints	Substandard 68.1.1	Where applicable there is evidence of Primary Contractor oversight and involvement in the Complaint process, including, but not limited to: the Member Handbook, Complaint decisions, written notification letters, investigations, scheduling of reviews, staff trainings, adherence of review committees to the requirements in Appendix H and quality of care concerns.
	Substandard 68.1.2	Training rosters and training curriculums demonstrate that Complaint staff, as appropriate, have been adequately trained on Member rights related to the processes and how to handle and respond to Member Complaints.
	Substandard 68.5	A verbatim transcript and/or recording of the second level Complaint review meeting is maintained to demonstrate appropriate representation, adherence to the Complaint review meeting process, familiarity with the issues being discussed and that the decision was based on input from all panel members.
	Substandard 68.6	Sign-in sheets are included for each Complaint review meeting that document the meeting date and time, each participant's name, affiliation, job title, role in the meeting, signature and acknowledgement of the confidentiality requirement.
	Substandard 68.8	Complaint case files include Member and provider contacts related to the Complaint case, investigation notes and evidence, Complaint review summary and identification of all review committee participants, including name, affiliation, job title and role.
Grievances	Substandard 71.1.1	Where applicable there is evidence of Primary Contractor oversight and involvement in the Grievance process, included but not limited to the Member Handbook, Grievance decisions, written notification letters, scheduling of reviews, staff trainings, adherence of review committees to the requirements in Appendix H and quality of care concerns.
	Substandard 71.1.2	Training rosters and training curriculums identify that Grievance staff, as appropriate, have been adequately trained on Member rights related to the processes and how to handle and respond to Member Grievances.
	Substandard 71.5	A verbatim transcript and/or recording of the Grievance review meeting is maintained to demonstrate appropriate representation, adherence to the Grievance review meeting process, familiarity with the issues being discussed and that input was provided from all panel members.
	Substandard 71.6	Sign-in sheets are included for each Grievance review meeting that

Category	PEPS Reference	PEPS Language
		document the meeting date and time, each participant's name, affiliation, job title, role in the meeting, signature and acknowledgement of the confidentiality requirement.
	Substandard 71.8	Grievance case files include Member and provider contacts related to the Grievance case, Grievance review summary and identification of all review committee participants, including name, affiliation, job title and role.
Denials		
Denials	Substandard 72.3	BH-MCO consistently reports denial data/occurrences to OMHSAS on a monthly basis according to Appendix AA requirements.
Executive Management		
County Executive Management	Substandard 78.5	Other: Significant onsite review findings related to Standard 78.
BH-MCO Executive Management	Substandard 86.3	Other: Significant onsite review findings related to Standard 86.
Enrollee Satisfaction		
Consumer/Family Satisfaction	Substandard 108.3	County's/BH-MCO's role of fiduciary (if applicable) is clearly defined, and provides supportive function as defined in the C/FST Contract, as opposed to directing the program.
	Substandard 108.4	The C/FST Director is responsible for: setting program direction consistent with County direction; negotiating contract; prioritizing budget expenditures; recommending survey content and priority; and directing staff to perform high quality surveys.
	Substandard 108.9	Results of surveys by provider and level of care are reflected in BH-MCO provider profiling, and have resulted in provider action to address issues identified.

²⁶In 2019, two Contractor-specific triennial substandards, 68.1.2 and 71.1.2, were added related to OMHSAS-specific provisions for complaints and grievances processes, respectively. Five MCO-specific substandards related to complaints and grievances provisions (four of which covered BBA provisions) were retired and replaced with eight new substandards related to complaints and grievances. Four of the substandards cover BBA provisions and four are OMHSAS-specific.

Appendix C: Program Evaluation Performance Summary: OMHSAS-Specific Substandards for CBH Counties

OMHSAS-specific substandards are not required to fulfill BBA requirements. In 2018, two Contractor-specific triennial substandards, 68.1.2 and 71.1.2, were added related to OMHSAS-specific provisions for complaints and grievances processes, respectively. Five MCO-specific substandards related to complaints and grievances provisions (four of which covered BBA provisions) were retired and replaced with eight new substandards related to complaints and grievances. Four of the substandards cover BBA provisions and four are OMHSAS-specific. In RY 2020, 18 OMHSAS-specific substandards were evaluated for CBH and Philadelphia. **Table C.1** provides a count of the OMHSAS-specific substandards applicable in RY 2020, along with the relevant categories.

Table C.1: Tally of OMHSAS-Specific Substandards Reviewed for CBH

Category (PEPS Standard)	Evaluated PEPS Substandards ¹		PEPS Substandards Under Active Review ²		
	Total	NR	RY 2020	RY 2019	RY 2018
Care Management					
Care Management (CM) Staffing	1	0	0	1	0
Longitudinal Care Management (and Care Management Record Review)	1	0	0	1	0
Complaints and Grievances					
Complaints	5	0	0	5	0
Grievances	5	0	0	5	0
Denials					
Denials	1	0	1	0	0
Executive Management					
County Executive Management	1	1	0	0	0
BH-MCO Executive Management	1	0	0	1	0
Enrollee Satisfaction					
Consumer/Family Satisfaction	3	0	3	0	0
Total	18	1	4	13	0

¹The total number of OMHSAS-Specific substandards required for the evaluation of HealthChoices Oversight Entity/BH-MCO compliance with OMHSAS standards. Any PEPS substandards not reviewed indicate substandards that were deemed not applicable to the HealthChoices Oversight Entity/BH-MCO.

²The number of OMHSAS-Specific substandards that came under active review during the cycle specific to the review year.

OMHSAS: Office of Mental Health & Substance Abuse Services; PEPS: Program Evaluation Performance Summary; CBH: Community Behavioral Health; RY: review year. NR: substandards not reviewed.

Format

This document groups the monitoring standards under the subject headings Care Management, Complaints and Grievances, Denials, Executive Management, and Enrollee Satisfaction. The status of each substandard is presented as it appears in the PEPS Review Application (i.e., met, partially met, not met) and/or applicable RAI tools (i.e., complete, pending) submitted by OMHSAS. This format reflects the goal of this supplemental review, which is to assess the County/BH-MCO's compliance with selected ongoing OMHSAS-specific monitoring standards.

Findings

Care Management

The OMHSAS-specific PEPS substandards relating to Care Management are MCO-specific review standards. CBH was evaluated on 2 of the 2 applicable substandards. Of the 2 substandards, CBH was non-compliant with both substandards. The status for these substandards is presented in **Table C.2**.

Table C.2: OMHSAS-Specific Requirements Relating to Care Management

Category	PEPS Item	RY	Status
Care Management			
Care Management (CM) Staffing	Substandard 27.7	2019	Not met
Longitudinal Care Management (and Care Management Record Review)	Substandard 28.3	2019	Not met

OMHSAS: Office of Mental Health & Substance Abuse Services; PEPS: Program Evaluation Performance Summary; RY: review year.

CBH was non-compliant with Standard 27, Substandard 7 of (RY 2019).

Standard 27: Care Management (CM) Staffing. Care management staffing is sufficient to meet member needs. Appropriate supervisory staff, including access to senior clinicians (peer reviewers, physicians, etc.) is evident.

Substandard 7: Other: Significant onsite review findings related to Standard 27.

CBH was non-compliant with Standard 28, Substandard 3 of (RY 2019).

Standard 28: Longitudinal Care Management (and Care Management Record Review).

BH-MCO has a comprehensive, defined program of care that incorporates longitudinal disease management.

Substandard 3: Other: Significant onsite review findings related to Standard 28.

Complaints and Grievances

The OMHSAS-specific PEPS substandards relating to second-level complaints and grievances include MCO-specific and County-specific review standards. CBH was evaluated on 10 of the 10 applicable substandards. Of the 10 substandards evaluated, CBH partially met 3 substandards, and did not meet 4 substandards, as indicated in **Table C.3**.

Table C.3: OMHSAS-Specific Requirements Relating to Complaints and Grievances

Category	PEPS Item	RY	Status
Complaints and Grievances			
Complaints	Substandard 68.1.1	2019	Not met
	Substandard 68.1.2	2019	Met
	Substandard 68.5	2019	Met
	Substandard 68.6	2019	Partially met
	Substandard 68.8	2019	Not met
Grievances	Substandard 71.1.1	2019	Not met
	Substandard 71.1.2	2019	Met
	Substandard 71.5	2019	Not met
	Substandard 71.6	2019	Partially met
	Substandard 71.8	2019	Partially met

OMHSAS: Office of Mental Health & Substance Abuse Services; PEPS: Program Evaluation Performance Summary; RY: review year.

CBH was partially compliant with Standard 68.6 (RY 2019), Standard 71.6 (RY 2019), and Standard 71.8 (RY 2019). CBH was non-compliant with Standard 68.1.1 (RY 2019), Standard 68.8 (RY 2019), Standard 71.1.1 (RY 2019), and Standard 71.5 (RY 2019).

Standard 68.1: The Primary Contractor is responsible for monitoring the Complaint process for compliance with Appendix H and the Program Evaluation Performance Summary (PEPS).

Substandard 1: Where applicable there is evidence of Primary Contractor oversight and involvement in the Complaint process, including but not limited to: The Member Handbook, Complaint decisions, written notification letters, investigations, scheduling of reviews, staff trainings, adherence of review committees to the requirements in Appendix H and quality of care concerns

Standard 68: The Complaint and Fair Hearing processes, procedures and Member rights related to the processes are made known to Members, BH-MCO staff and the provider network through manuals, training, handbooks, etc.

Substandard 8: Complaint case files include Member and provider contacts related to the Complaint case, investigation notes and evidence, Complaint review summary and identification of all review committee participants, including name, affiliation, job title and role.

Standard 68: The Complaint and Fair Hearing processes, procedures and Member rights related to the processes are made known to Members, BH-MCO staff and the provider network through manuals, training, handbooks, etc.

Substandard 6 (RY 2020): Sign-in sheets are included for each Complaint review meeting that document the meeting date and time, each participant's name, affiliation, job title, role in the meeting, signature and acknowledgement of the confidentiality requirement.

Standard 71: The Grievance and Fair Hearing processes, procedures and Member rights related to the processes are made known to Members, BH-MCO staff and the provider network through manuals, training, handbooks, etc.

Substandard 6: Sign-in sheets are included for each Grievance review meeting that document the meeting date and time, each participant's name, affiliation, job title, role in the meeting, signature and acknowledgement of the confidentiality requirement.

Substandard 8: Grievance case files include Member and provider contacts related to the Grievance case, Grievance review summary and identification of all review committee participants, including name, affiliation, job title and role.

Standard 71.1: The Primary Contractor is responsible for monitoring the Grievance process for compliance with Appendix H and the Program Evaluation Performance Summary (PEPS).

Substandard 1: Where applicable there is evidence of Primary Contractor oversight and involvement in the Grievance process, including but not limited to: The Member Handbook, Grievance decisions, written notification letters, scheduling of reviews, staff trainings, adherence of review committees to the requirements in Appendix H and quality of care concerns.

Standard 71: Grievances and State fair hearings. Grievance and fair hearing rights and procedures are made known to EAP, members, BH-MCO Staff, and the provider network through manuals, training, handbooks, etc.

Substandard 5: A verbatim transcript and/or recording of the Grievance review meeting is maintained to demonstrate appropriate representation, adherence to the Grievance review meeting process, familiarity with the issues being discussed and that input was provided from all panel members.

Denials

The OMHSAS-specific PEPS substandard relating to Denials is an MCO-specific review standard. CBH was evaluated for and met the criteria of this substandard. The status for this substandard is presented in **Table C.4**.

Table C.4: OMHSAS-Specific Requirements Relating to Denials

Category	PEPS Item	RY	Status
Denials			
Denials	Substandard 72.3	2020	Met

OMHSAS: Office of Mental Health & Substance Abuse Services; PEPS: Program Evaluation Performance Summary; RY: review year.

Executive Management

There are two OMHSAS-specific PEPS substandards relating to Executive Management; the County Executive Management substandard is a county-specific review standard, and the BH-MCO Executive Management substandard is an MCO-specific review substandard. CBH was partially compliant with 1 substandard. The second substandard, 78.5 was deemed not applicable to CBH's review. The status for these substandards is presented in **Table A.5**.

Table C.5: OMHSAS-Specific Requirements Relating to Executive Management

Category	PEPS Item	RY	Status
Executive Management			
County Executive Management	Substandard 78.5	2019	Not reviewed
BH-MCO Executive Management	Substandard 86.3	2019	Partially met

OMHSAS: Office of Mental Health & Substance Abuse Services; PEPS: Program Evaluation Performance Summary; RY: review year; BH: behavioral health; MCO: managed care plan.

CBH was partially compliant with Standard 86, Substandard 3 (RY 2019).

Standard 86: BH-MCO Executive Management. Required duties and functions are in place. The BH-MCO's table of organization depicts organization relationships of the following functions/ positions: Chief Executive Officer; The appointed Medical Director is a board-certified psychiatrist licensed in Pennsylvania with at least five years of experience in mental health and substance abuse; Chief Financial Officer; Director of Quality Management; Director of Utilization Management; Management Information Systems; Director of Prior/Service Authorization; Director of Member Services; Director of Provider Services.

Substandard 3: Other: Significant onsite review findings related to Standard 86.

Enrollee Satisfaction

The OMHSAS-specific PEPS substandards relating to Enrollee Satisfaction are County-specific review standards. All 3 substandards crosswalked to this category were evaluated for Philadelphia County. Philadelphia County met the criteria for all 3 substandards, as seen in **Table C.6**.

Table C.6: OMHSAS-Specific Requirements Relating to Enrollee Satisfaction

Category	PEPS Item	RY	Status
Enrollee Satisfaction			
Consumer/Family Satisfaction	Substandard 108.3	2020	Met
	Substandard 108.4	2020	Met
	Substandard 108.9	2020	Met

OMHSAS: Office of Mental Health & Substance Abuse Services; PEPS: Program Evaluation Performance Summary; RY: review year.