



Compliance Monitoring for 1115 Medicaid SMI Waiver Requirement of Follow-up Contact Within 72-Hours Overview

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Reference Sources



- State Operations Manual Appendix A - Survey Protocol, Regulations and Interpretive Guidelines for Hospitals (Rev. 183, 10-12-18)
- INDIANA HEALTH COVERAGE PROGRAMS BULLETIN BT201967 NOVEMBER 26, 2019
- Specifications Manual for Joint Commission National Quality Measures (v2016B)

Best Faith Effort of Post-Discharge Follow-up Contact



- Hospitals should make reasonable efforts to get contact information from beneficiary and/or family, support person(s), discharge setting, along with appropriate releases of information/permission in accordance with the facility's policies.
- Hospitals should contact beneficiary/caregivers/community-based providers through the most effective means possible.
- Types of contact methods: email, text messaging, phone call.

Best Faith Effort of Post-Discharge Follow-up Contact (2)



- Hospitals should attempt to reach beneficiary and staff at community-based providers who are familiar with beneficiary's discharge plan and responsible for care.
- Three (3) attempts will generally be considered reasonable and all attempts, whether successful or not, should be documented.
- For successful attempts, documentation should include content of the discussion and any further questions or follow-up needed.

Best Faith Effort of Post-Discharge Follow-up Contact (3)



- Hospital staff placing calls, text messaging, or email should be familiar with the patient's discharge plan and qualified to address typical questions that might be expected.
- They should also be knowledgeable about when to instruct the patient to seek a more immediate evaluation, including where to go for the evaluation.
- The primary intent would be to provide an opportunity for questions and to reduce or eliminate any confusion or concerns regarding post-hospital care.



Waiver Requirements Compliance Monitoring



- DMHA Quality Improvement will audit compliance of hospital at unannounced recertification review site visits.
- Quality Improvement staff will ensure that organizations have written protocols in place related to the required post discharge follow-up care.
- Audit focus for this requirement will be to ensure “contact is made by the treatment setting with each discharged beneficiary within 72 hours of discharge and follow-up care is assessed.”



Documentation Review

- The review will ascertain whether or not there is documentation that post-discharge contact was conducted with the patient within 72 hours of hospital/facility discharge.
- To compute 72 hours, count the day after hospital discharge as day 1.
- Documentation of post-discharge follow-up can occur any time up to 23.59 of day 3.



Documentation Review (2)

- If the post-discharge evaluation was conducted beyond the 72 hour timeframe the finding will be that of “out of compliance” with respect to required care coordination and transition to the community.
- Documentation could reflect that there was phone contact made with the patient/caregiver but the post-discharge evaluation could not be conducted because attempts to contact the patient or caregiver were unsuccessful.



Documentation Review (3)

- EXAMPLES OF DOCUMENTATION
- “Home phone provided at discharge is a wrong number, AND no e-mail address or other contact information was provided by patient and/or caregiver at discharge.”
- “Calls placed go to voicemail system. Message left for patient and/or caregiver requesting a return phone call, but no returned call received.”

Documentation Examples (Cont.)



- “E-mail address generates an undeliverable message and no phone number is available for patient and/or caregiver.”
- “E-mail message delivered with no return response from the patient and/or caregiver.”



DMHA Approved Sites



- NEUROBEHAVIORAL HOSPITAL LLC
- RIVERCREST SPECIALTY HOSPITAL LLC
- BRENTWOOD MEADOWS LLC
- SYCAMORE SPRINGS LLC
- NEUROPSYCHIATRIC HOSPITAL OF INDIANAPOLIS LLC
- VALLE VISTA HEALTH SYSTEM
- DOCTORS NEUROPSYCHIATRIC HOSPITAL





DMHA Approved Sites (2)



- OPTIONS TREATMENT CENTER ACQUISITION
- MICHIANA BEHAVIORAL HEALTH CENTER
- ASSURANCE HEALTH INDIANAPOLIS LLC
- WELLSTONE REGIONAL HOSPITAL
- BLOOMINGTON MEADOWS HOSPITAL
- HARSHA BEHAVIORAL CENTER INC.





Questions?

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