



Eric Holcomb, Governor
State of Indiana

Division of Mental Health and Addiction
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Child Mental Health Wraparound Quality Assurance Provider Sanction Policy

To: All Authorized Child Mental Health Wraparound Providers

Child Mental Health Wraparound (CMHW) Services

Indiana's Division of Mental Health and Addiction (DMHA) has been given the authority by the Office of Medicaid Policy and Planning (OMPP) to administer the Center for Medicare and Medicaid Services (CMS) approved 1915(i) Child Mental Health Wraparound services state plan amendment. The design of the services program was jointly developed by DMHA and OMPP. As the administrator of the CMHW program, DMHA is responsible to ensure compliance and issue sanctions to providers, as necessary.

Authorized provider for the CMHW program, are required to adhere to all policies, rules, and regulations guiding the program. This includes but is not limited to compliance with the CMHW program module, Indiana Administrative Code, Indiana Health Coverage Programs, Indiana State Plan Amendment, and the provider agreement. The Provider is also responsible to adhere to all Medicaid requirements as they pertain to providing and billing for the CMHW services.

- [CMHW services state plan amendment](#)
- [Indiana rule related to CMHW services](#) (405 IAC 5-21.7)
- [CMHW services provider manual](#)
- [Indiana Medicaid provider website](#)
- [Provider Agreements:](#)

Rights to Appeal

If you are sanctioned by DMHA, your rights to appeal will be included in the sanction letter.

DMHA is not required to proceed incrementally through these steps and may elect to advance past steps as is warranted by the nature of the incident and/or complaint. When making decisions about provider sanctions, DMHA also considers the totality (history) of issues/complaints received for any given provider and the success of any previous actions taken to address them.



Provider Sanctions: *Least Restrictive to Most Restrictive*

- **Technical assistance and support**
 - Email guidance to the provider/provider agency.
- **Education letter**
 - A letter written on FSSA letterhead providing guidance and education to the provider/provider agency.
- **Mandatory meeting**
 - Provider/provider agency will meet with DMHA to discuss issues and/or concerns. DMHA and the provider/provider agency will develop and agree upon an informal plan to address the concerns.
- **Corrective action and/or suspension**
 - A “formal notice” written on FSSA letterhead requiring formal corrective action. Provider will be required to create a written corrective action plan.
 - The plan must be approved by DMHA before the provider/provider agency can proceed to implement the plan.
 - DMHA may also elect to suspend the provider/provider agency, prohibiting partnerships with new CMHW families but allowing provider/provider agency to continue partnerships with current families.
 - *A more restrictive suspension could also include a moratorium of the provider may not partner with any youth pending further investigation. (Section 13; see bullet points, page 62.)*
- **Deauthorization of specific staff members**
 - If DMHA determines the issue is a direct result of actions (or lack thereof) taken by one provider employee, deauthorization of that provider employee may occur. Agencies are responsible for the actions of their staff.
- **Deauthorization as a 1915i CMHW provider**
 - If DMHA determines the issue is a direct result of actions (or lack thereof) taken by one provider employee, deauthorization of that provider employee may occur. Agencies are responsible for the actions of their staff.
- **Zero tolerance**
 - There will be zero tolerance for the following occurrences listed below.
 - Abuse and neglect
 - Child exploitation
 - Fraud