

**Community Mental Health Affiliation  
of Mid-Michigan**

<b>PROCEDURE #:</b> 1.6	Page 1 of 2	<b>SUBJECT:</b> Authorization of Affiliation Requirements
<b>Related Policy(ies) #:</b> 1.0		<b>SUBJECT:</b> PIHP Administration
<b>Issuing Director:</b> Director of Affiliation Operations		<b>Original Effective Date:</b> 03/05/08

**REVISED DATE**

03/15/10
03/02/09

**Review Date(s)**

03/16/11					

**I. PURPOSE:**

To ensure that the PIHP communicates to CMHAMM affiliates, all contractual requirements between the PIHP and Affiliates in a manner that is clear and consistent across the Affiliation. All requirements/expectations will be based on current state and federal regulations, formally approved by PIHP Leadership, and are consistent with CMHAMM Practice Guidelines and policies and procedures.

**II. STANDARDS:**

- A. PIHP Medicaid Contract (& sub-contracts)
- B. CMHAMM Policy 1.0 PIHP Administration - Procedure 1.3 (Policy and Procedure Development and Review)

**III. PROCEDURES:**

**Altering Existing PIHP Expectations or Developing New PIHP Expectations:**

- A. PIHP staff will communicate the need for a new or significantly altered PIHP expectation of affiliates, to the Director of Affiliation Operations (DAO). The requested expectation must reflect a current state or federal requirement.
- B. The DAO will review the proposed requirement to ensure it is:
  - 1. Related to a delegated function
  - 2. Meeting Medicaid contractual obligations between the PIHP and MDCH.
  - 3. Consistent with existing CMHAMM Practice Guidelines and policy and procedures
  - 4. Clearly stated in the appropriate format and venue by the appropriate PIHP Staff.
- C. The DAO will also ensure that the proposed requirement will be communicated to all affiliates impacted by the proposed requirement by issuing a CMHAMM Bulletin outlining the change and date to take effect.

- D. When appropriate, the DAO will begin Procedure 1.3 (Policy and Procedure Development and Review) and authorize the requirement through policy or procedure.
- E. When the requirement does not warrant policy or procedure development, but meets the conditions in item B above, the DAO will authorize it and send formal notification of the requirement to the Affiliation Compliance Administrator and the CEO and Compliance Officer of each affiliate impacted by the change by issuing a CMHAMM Bulletin outlining the change and date to take effect.

**Ensuring Compliance with PIHP Expectations:**

- A. PIHP staff will communicate any noncompliance issues to the DAO.
- B. The DAO will consult with all relevant PIHP and affiliate staff concerning reported noncompliance issues and decide on an appropriate course of action to enforce compliance.
- C. CMHAMM affiliates are only responsible for adhering to requirements authorized by the DAO, through this procedure, or Procedure 1.3 (Policy and Procedure Development Review) and are accompanied by a CMHAMM Bulletin.
- D. CMHAMM affiliates are only responsible for responding to noncompliance findings formally communicated by the DAO or designated representative.

**IV. APPLICATION:**

All representatives of the PIHP and CMHAMM CMHSPs.

**V. MONITOR AND REVIEW:**

The Director of Affiliation Operations will monitor how PIHP expectations are communicated to affiliates. The Director of Affiliation Operations will review this procedure annually.

**VI. RELATED POLICIES AND PROCEDURES:**

CMHAMM Policy	1.0	PIHP Administration
CMHAMM Procedure	1.3	Policy and Procedure Development Review