

**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**

03/02/09

**Review Date(s)**


**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 CEO and Compliance Administrator 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.

**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