

NM SBHCs Medicaid Recertification Guide

This guide is intended to assist SBHCs in completing the SBHC Site Review Self-Assessment and to understand expectations during the Site Review. Additionally, this guide will assist Managed Care Organization (MCO) reviewer(s) to understand the intent and complete the on-site review in a consistent manner. This guide cannot cover all situations therefore the MCO reviewer and SBHC Coordinator are directed to contact HCA/MAD for technical assistance and/or annotate concerns in documentation.

This is a collaborative vetting process that provides evidence for ongoing adherence to the New Mexico Standards and Benchmarks for School-Based Health Clinics set forth by the Department of Health (DOH), Office of School and Adolescent Health (OSAH). The Standards and Benchmarks outline State and Federal regulations and serve as prerequisite to funding and reimbursement.

SBHCs that are sponsored by a medical entity will have the recertification site review performed by one of the Turquoise Care MCOs. Nonmedically sponsored, provider type 321 will be conducted in a similar manner by DOH/OSAH. In the case of a state government travel ban, site reviews will be restricted to specific SBHCs, and certification will be detailed in a Letter of Direction. On-site reviews are conducted every three years regardless of the sponsorship type.

1) Site Visit Schedule:

- a) At the 1st MCO SBHC Advisory Meeting of each calendar year HCA/MAD will provide a list of DOH/OSAH contracted SBHC sponsors with SBHC sites, SBHC spokes, certification expiration date and recertification due date. The SBHC MCO Liaison will be responsible for obtaining this information from HCA/MAD and disseminating that information to responsible parties within the MCO and to SBHC Sites.
 - i) This information will be available by attending the meeting, contacting the meeting facilitator, or contacting HCA/MAD SBHC Program Manager.
- b) Medically Sponsored SBHCs
 - i) MCO will use the provided schedule to collaborate with the SBHC sponsor to select a site and a review date **at least 8 weeks prior to expiration**. It is recommended to give the SBHC ample time to prepare for the site review. **The MCO will conduct the site review at least 6 weeks prior to expiration of current SBHC certification.**
 - ii) MCO reviewer will provide the SBHC Sponsor with name and contact information of the MCO representative conducting site review, the most recent digital copy of New Mexico Standards and Benchmarks, a SBHC Site Review Self-Assessment Tool, School Based Health Center Telehealth HIPAA Compliance Attestation form and the SBHC Site Review Recertification Guide.

(1) Documents can also be obtained by contacting the HCA/MAD SBHC Program Manager
 - iii) MCO reviewer will direct SBHC Sponsor to complete a SBHC Self-Assessment form for **each site** and to make materials and documents available digitally or physically **1 week prior to on-site review**. The site review cannot be conducted until all SBHCs Self-Assessments are completed and collected.
 - iv) A representative from the SBHC Sponsor and the SBHCs will be present at the time of the On-Site Review.

- c) Non- Medically Sponsored SBHCs will follow the same process as described above in section b) i-iv apart from coordinating with DOH/OSAH instead of the MCO.
- 2) **SBHC Site Review Self-Assessment:** This process is intended to be used as SBHC readiness, to discover areas of improvement and request clarification.
- a) It is the SBHC Sponsoring Entity’s responsibility to ensure that **each SBHC** is provided with a self-assessment form and ensure that they are **completed and submitted to the MCO reviewer within one week** of the scheduled date of the on-site review.
- b) It is the SBHC and Sponsoring Entity’s responsibility to seek assistance.
- i) Clinical Operations questions should be directed to DOH/OSAH and Medicaid questions should be directed to HCA/MAD SBHC Program Manager.
- ii) SBHC site should first attempt to resolve compliance conflicts with Sponsoring Entity’s guidance.
- c) **Guidance for Completing SBHC Site Review Self-Assessment Form:**
- i) Comments for YES responses should annotate reference to evidence for and/or any unique processes. Comments for NO responses should annotate reason for noncompliance and an action plan. Comments for NA should explain why specific criteria are not applicable to the SBHC site. Single word responses should be avoided. Medical Record Review must consist of 5-10 Physical Health and 5-10 Behavior Health medical records audits/reviews. This can be as few as 5 medical records if the records have both Physical Health and Behavioral Health Services. If the review produces mixed results all results will be annotated. MCO reviewers do not review medical records. Self-Assessment is considered complete with annotations of SBHC specific procedures, correction(s) and signed by a representative from the Sponsoring entity and a SBHC site representative. A SBHC Site Self-Assessment for each SBHC must be provided to the reviewer(s) 1 week prior to the onsite review and at the time of the onsite review. **The SBHC Sponsor** representative and/or the SBHC Site representative will prepare to provide or direct MCO representative to evidence and discuss all responses.
- 3) **On-Site Review:** The following guidance is provided for completing the onsite review
- a) MCO representatives will have direct access to the SBHC EAT Scoring and SBHC EAT-Summary. During the on-site review, the MCO representative will use the SBHC EAT-Scoring tool.
- b) Review SBHC-EAT Form Instructions, Scoring and Score Summary Tabs.
- i) The SBHC Site Review Self-Assessment and SBHC EAT-Scoring is orientated to physical locations to allow for a tour of SBHC site followed by a sit-down review of the policies and procedures. There is no requirement for which order to conduct onsite review.
- ii) The Categories in the SBHC EAT-Scoring Form have many of the same criteria as the SBHC Site Review Self-Assessment Tool.
- c) **MCO representative will account for all SBHC Site Review Self-Assessment(s): Completed forms for each SBHC site must be present at the time of the on-site review.**
- d) The MCO representative and SBHC representative will conduct a tour of the selected SBHC Site
- (a) Reviewer will look for evidence of quality assurance processes, written SBHC specific procedures, and evidence of staff knowledge. The SBHC Site Review Self-Assessment will be cross referenced to facilitate finding evidence.

- (b) MCO reviewer will record response to each item on “Scoring” Tab which will auto populate results. MCO reviewer will record annotations in the comments box.
 - (i) Not Applicable (NA) responses will also be positively scored as described in the SBHC EAT-Scoring instructions.
- (c) On the spot corrections will result in a passing score and a note describing corrections. Any corrections that cannot be corrected on the spot will result in a Corrective Action Plan. **Failure to demonstrate state and federal standards may void provider agreements.**
- (d) **Medical Record:** MCO reviewer will review the results of the medical records review in the self-assessment. It is important that the SBHC Site Review Self-Assessment is completed with robust comments.
- (e) To receive Recertification, the sponsoring entity/SBHC must have scores of 90% or above on the SBHC EAT- Scoring, all SBHC Site Review Self Assessments, and a School Based Health Center Telehealth HIPAA Compliance Attestation form (from each affiliated spoke).
 - (i) Each category that results in >90% compliance will automatically fill red. This will require action plan comment and may result in a Corrective Action Plan, as determined by DOH and MAD.

4) Review Team Actions

- a) Upon completion of the on-site review the MCO will conduct an exit interview prior to leaving the location in which the following will be discussed
 - i) A summary of the findings
 - ii) process to submit follow up evidence to the MCO reviewer
 - iii) process of official notification outlined below in c) of this section.
- b) A summary of findings will be reported to DOH/OSAH and HCA/MAD on the 10th business day following the date of the Site Review.
 - i) The MCO will submit copies of all completed SBHC Self Assessments, SBHC EAT-Scoring, SBHC EAT-Summary, and a School Based Health Center Telehealth HIPAA Compliance Attestation form to DOH/OSAH and HCA/MAD
 - ii) During that 10-day time frame, the MCO may accept any missing documentation from the On-Site Review and then make amendments to the Site Review scores. Any amendments must be annotated in the SBHC EAT- Summary.
 - iii) Annotate any on-the-spot corrections, guidance and/or educational materials provided to the SBHC in the SBHC EAT Summary.
- c) DOH/OSAH and HCA/MAD will review the SBHC EAT-Scoring and SBHC EAT-Summary and the School Based Health Center Telehealth HIPAA Compliance Attestation form. HCA/MAD will determine if the sponsoring entity qualifies for SBHC recertification, written notice in the form of the HSD/MAD School Based Health Center Certification letter will be given within 10 business days to the sponsoring entity, the MCOs, and DOH/OSAH. This letter should be kept in SBHC credentialing files by all parties.
 - i) Date of the written notice for SBHC recertification plus three years will be the new expiration date. SBHC Sponsor and SBHC site(s) are expected to be aware of this date and process.

- d) If after review of the documents, HCA/MAD determines that the sponsoring entity does not qualify for SBHC recertification, the sponsoring entity will be placed on Corrective Action Plan (CAP) status and written notice will be given within 10 business days to the sponsoring entity and the MCOs. SBHCs are encouraged to collaborate with DOH/OSAH and/or HCA/MAD to ensure efforts are effective.
- i) Within 10 business days of receipt of CAP status notification, the sponsoring entity must provide HCA/MAD with their written plans to correct any compliance deficiencies.
 - ii) The sponsoring entity has 60 calendar days from receipt of CAP status notification to correct the deficiencies.
 - (1) After 60 days, OSAH and HCA/MAD will conduct a CAP site review to determine resolution of deficiencies and release of the CAP status.
 - iii) Within 5 business days of release of CAP status, HCA/MAD will provide written notice of Recertification to the sponsoring entity and MCO in the form of the HSD/MAD School Based Health Center Certification letter. This letter should be kept in SBHC credentialing files by all parties.

This guide will be reviewed annually at the July SBHC MCO Advisory meeting. MCOs and SBHCs are expected to submit revision requests to the facilitator, New Mexico Alliance of School Based Health Care at least 10 working days prior to scheduled meeting.