

GENERAL INFORMATION/GUIDELINES

*The revised MSC protocol is different from previous protocols used by the Division of Quality Improvement. This protocol is intended to measure whether MSC services comply with the quality requirements contained in our HCBS waiver and the Medicaid Vendor Manual and to measure whether MSC services meet OPWDD's mission and vision for MSC services. **Billing and claiming requirements are not included in the revised protocols.** Each MSC Vendor is required to monitor billing and claiming requirements as part of its Medicaid compliance plan. The Bureau of Compliance Management will continue to conduct limited fiscal reviews at selected agencies. As part of the limited fiscal review, the Bureau of Compliance Management will review the implementation of an agency's Medicaid Compliance Plan.*

The revised MSC review procedures are comprised of three (3) documents that will be used for the review of Medicaid Service Coordination:

- 1. **A vendor level review of an MSC provider:** This protocol will be used once yearly for agencies that provide MSC services. The vendor review can be started at any time during the annual review cycle but it cannot be completed until all service reviews and interviews are completed. It reviews whether a MSC vendor has systems and/or mechanisms to ensure the quality of the MSC services it provides.*
- 2. **A MSC service review:** This protocol will be used by DQI surveyors for the routine reviews of MSC services provided to individuals. The protocol will collect data regarding the quality and effectiveness of MSC services being provided. The quality indicators used in the protocol relate to OPWDD's mission and vision for MSC services. That data will be used to determine whether an agency's systems, reviewed at the vendor review, are effective. It will also be used by OPWDD to measure the quality of MSC services system-wide, and identify areas in need of systemic remediation.*
- 3. **An interview** of MSC service recipients, and their advocates if appropriate, regarding their satisfaction with the service coordination they are receiving. Interview questions will be used to obtain the information needed to answer quality questions on the Vendor & routine MSC service protocols.*

The analyst must complete a routine MSC review for five percent (5%) of the individuals who receive MSC from an agency. The sample used should be representative of people who live in certified sites, people who live independently and people who live with families. The sample should also be representative, if possible, of assorted age groups and functioning levels and should include a review of as many Medicaid Service Coordinators employed by an agency as possible.

Unless the MSC review results in a finding of immediate danger to the health and safety of individuals being served, it is not expected that a statement of deficiencies will be issued. It is expected that at the conclusion of each MSC review, the MSC vendor will be provided with a report of the findings from the visit. At the conclusion of all the MSC reviews conducted at an agency during the fiscal year, the agency will be provided with an aggregated summary of the findings of all MSC reviews. If systemic or pervasive deficient practices that would affect the renewal of the vendor's MSC contract have been identified during the review of MSC services, the agency will be given the opportunity to develop and implement a quality improvement plan or plan of corrective action. During subsequent MSC reviews, DQI will monitor implementation of the plan and evaluate whether it is improving the MSC services that are being provided by the vendor. If the vendor is unable to correct deficient practices, DQI will recommend non-renewal of the MSC contract or renewal with limitations in accordance with the provisions in the Vendor Manual.

In any case when a deficiency is found that presents a potential significant risk to the health or safety of an individual, DQI can issue a written statement of deficiencies and require a written plan of correction. For deficiencies that present an immediate danger to an individual, DQI will require immediate correction at the time the deficiency is identified.

Special Instructions for MSC Reviews for Willowbrook Class Members:

Please note: An MSC protocol must be completed annually for all Willowbrook class members who reside in an OPWDD certified IRA. In addition, for all Willowbrook class members who reside in an OPWDD certified IRA, a statement of deficiencies must be generated for all regulatory deficiencies found. The questions designated “WB” must be answered for all Willowbrook class members.