

<b>COMMUNITY MENTAL HEALTH PARTNERSHIP OF SOUTHEAST MICHIGAN/PIHP</b>	<b>Policy</b> <b>County of Financial Responsibility</b> <b>within the CMHPSM PIHP</b>
<b>Committee/Department:</b> Network Management Committee	<b>Local Policy Number:</b>
<b>Implementation Date</b> 07/08/22	<b>Regional Approval Date</b> 06/24/2022

<b>Reviewed by:</b>	<b>Recommendation Date:</b>
ROC	03/09/2022
<b>CMH Board:</b>	<b>Approval Date:</b>
Lenawee	03/31/2022
Livingston	03/29/2022
Monroe	03/23/2022
Washtenaw	06/24/2022

### I. PURPOSE

To establish guidelines relating to the Community Mental Health Service Program (CMHSP) service and financial responsibility for consumers/individuals served that the Community Mental Health Partnership of Southeast Michigan (CMHPSM), the Pre-Paid Health Plan (PIHP) for the four-county region comprised of Lenawee, Livingston, Monroe, and Washtenaw counties.

### II. REVISION HISTORY

DATE	MODIFICATION
3/1/2019	Reviewed and revised for clarity
06/24/2022	Reviewed and revised for clarity

### III. APPLICATION

This policy only applies to consumers/individuals served by one of the four CMHSPs within our PIHP region, who are also eligible for a capitated payment that is received by the CMHPSM PIHP for the four-county region comprised of Lenawee, Livingston, Monroe, and Washtenaw counties.

Consumers/individuals served residing within the CMHPSM region receiving solely general fund supported services are not covered by this policy as local funding is not managed by the CMHPSM regionally.

Consumers/individuals residing within the CMHPSM region with an out of region County of Financial Responsibility (COFR) status are not covered by this policy; an out of region COFR is an individual served by a CMHSP within the CMHPSM four-county region with capitated funding received from outside our PIHP region; or an individual served by a CMHSP outside our four-county region when one of our in-region CMHSPs is identified as the COFR.

### IV. POLICY

It is the policy of the CMHPSM that the four regional CMHSPs will not enter into a County of Financial Responsibility (COFR) arrangement with each other related to any consumer/individual served whose services are covered by a CMHPSM PIHP capitated funding source. The CMHSP that provides services where a consumer/individual served covered by this policy is currently residing is responsible for the delivery of all PIHP covered services regardless of the location of the consumer/individual's last residence in an independent arrangement. The CMHPSM will cost settle at the end of each fiscal year with CMHSPs related to all PIHP covered services for consumers/individuals served within its PIHP region, including consumers/individuals served covered by this policy.

## V. DEFINITIONS

Community Mental Health Partnership of Southeast Michigan (CMHPSM): The Regional Entity that serves and is comprised of the four-county affiliation of Lenawee, Livingston, Monroe, and Washtenaw to provide specialty services and supports for people with mental health, intellectual/developmental disabilities, and substance use disorder.

Community Mental Health Services Program (CMHSP): A program operated under chapter 2 of the Mental Health Code as a county community mental health agency, a community mental health authority, or a community mental health organization.

County of Financial Responsibility (COFR): CMHSP who last served a consumer/individual served in the county where they last lived independently.

Electronic Health Record (EHR): The software platform used across the CMHPSM region in which consumer/individual served medical, behavioral health, demographic, utilization management, and claims payment data are entered and used in the management and provision of services.

Independent Living Arrangement: A living arrangement that,

- a. for an adult, is either an unlicensed setting or a setting in which the consumer/individual served required less than eight hours of specialized service/supports in the residence each day to maintain their health and safety in the least restrictive environment.
- b. for a child, is either the county in which the child/youth last resided with parents (birth or adoptive) prior to an out of home placement or if the child/youth is a temporary or permanent ward of the court, it is the county where the child currently resides in the community (i.e., licensed foster care home, relative placement or independent living) as long as the foster care case remains open.

Individual Plan of Service (IPOS): The plan for the services and supports a consumer/individual served will be provided that is developed using the principles of person centered/family centered planning as required by the Medicaid contract with the CMHPSM.

Originating CMHSP: Within the CMHPSM region, the CMHSP for the county in which a consumer/individual served last resided in an independent living arrangement.

Serving CMHSP: Within the CMHPSM region, the CMHSP for the county in which a consumer/individual served currently resides and is determined eligible to receive Medicaid services or is receiving Medicaid covered services.

**VI. STANDARDS**

- A. Consumers/individuals served must be provided appropriate services without delay resulting from issues of determining financial responsibility.
- B. CMHSPs are responsible to ensure all medically necessary services are provided to a consumer/individual served residing within the CMHPSM four county region that is currently and continually eligible for Medicaid, Healthy Michigan or any other capitated funding source managed through the CMHPSM PIHP. The CMHSP delivering services to any consumer/individual covered by this policy will be recognized as the serving CMHSP, in relation to this policy.
- C. The Serving CMHSP, where a consumer/individual served is determined eligible to receive or is receiving services, develops the Individual Plan of Service (IPOS), authorizes all medically necessary services, and enters all relevant service and claim documentation into the Electronic Health Record (EHR).
- D. The Serving CMHSP is responsible to manage crisis and emergency services for inpatient hospitalization. The CMHSP serving the County where a consumer/individual served last resided, in an independent living arrangement, will still be tracked in relation to consumers/individuals served covered by this policy. That CMHSP will be referred to as the originating CMHSP in relation to this policy.
- E. If a consumer/individual served, covered by this policy, moves to a dependent setting, in a County outside of the CMHPSM four County region, the originating CMHSP will be recognized as the COFR, where appropriate, related to any out of region COFR arrangement. The serving CMHSP will notify the originating CMHSP when such an event occurs.
- F. At the time a consumer/individual served moves outside the CMHPSM, the serving CMHSP will terminate services and the originating CMHSP becomes responsible for coordinating and funding services if an out of region COFR arrangement is required.

**VII. EXHIBITS**

None

**VIII. REFERENCES**

Reference:	Check if applies:	Standard Numbers:
MDHHS/PIHP Managed Mental Health Supports and Services Contract	X	
42 CFR Parts 400 et al. (Balanced Budget Act)		
45 CFR Parts 160 & 164 (HIPAA)		
42 CFR Part 2 (Substance Abuse)		

Michigan Mental Health Code Act 258 of 1974	X	
The Joint Commission - Behavioral Health Standards		
Michigan Department of Community Health (MDHHS) Medicaid Contract	X	
Michigan Medicaid Provider Manual	X	