

<b>COMMUNITY MENTAL HEALTH PARTNERSHIP OF SOUTHEAST MICHIGAN/PIHP</b>	<b><i>Policy</i></b> <b><i>County of Financial Responsibility</i></b> <b><i>within the CMHPSM PIHP</i></b>
<b>Department: Network Management</b>	<b>Local Policy Number:</b>
<b>Regional Operations Committee Approval Date 4/22/2019</b>	<b>Implementation Date 5/6/2019</b>

**I. PURPOSE**

To establish guidelines relating to the Community Mental Health Service Program CMHSP service and financial responsibility for consumers that the CMHPSM PIHP receives capitated payments for, whom live within the four-county region comprised of Lenawee, Livingston, Monroe and Washtenaw counties

**II. REVISION HISTORY**

<b>DATE</b>	<b>REV. NO.</b>	<b>MODIFICATION</b>
3/1/2019		Reviewed and revised for clarity

**III. APPLICATION**

This policy only applies to consumers the CMHSPs serve that are covered by a capitated payment source received by the Community Mental Health Partnership of Southeast Michigan (CMHPSM), the Pre-Paid Health Plan (PIHP) for the four-county region comprised Lenawee, Livingston, Monroe and Washtenaw counties.

Individuals residing within the CMHPSM region receiving solely general fund supported services are not covered by this policy local funding is not managed by the CMHPSM.

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 any individual where a county outside of the CMHPSM four county region is identified as COFR.

**IV. POLICY**

It is the policy of the CMHPSM that the four regional CMHSPs will not enter in to a County of Financial Responsibility (COFR) arrangement with each other related to any individual whose services are covered by a CMHPSM PIHP capitated funding source. The CMHSP that provides services within the county where a consumer covered by this policy is currently residing is responsible for the delivery of all PIHP covered services regardless of the location of the consumer'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 served within its PIHP region, including consumers 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, developmental/intellectual 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 in the county where they last lived independently.

Electronic Health Record (EHR): The software platform used across the CMHPSM region in which consumer 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 required less than eight hours of specialized service/supports in the residence each day in order 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 served by the “court of record”.

Individual Plan of Service (IPOS): The plan for the services and supports an individual 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 last resided in an independent living arrangement.

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

## VI. STANDARDS

- A. Consumers 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 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 individual covered by this policy will be recognized as the serving CMHSP, in relation to this policy.

- C. The Serving CMHSP where a consumer 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.
- E. The CMHSP serving the County where an individual last resided in an independent living arrangement will still be tracked in relation to consumers covered by this policy. That CMHSP will be referred to as the originating CMHSP in relation to this policy.
- F. If an individual consumer 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.
- G. At the time a consumer 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	