

**Mercy Maricopa Integrated Care  
 Notice to Cure ACT Fidelity Requirements – Action Plan**

Area	Required Action	Actions Completed	Person Responsible	Action Steps to be completed by 1/6/17
<b>ACT 3.1 minimum threshold for average face-to-face contacts</b>	<p>AHCCCS expects that the contractor will ensure services provided by the ACT teams are compliant with the fidelity requirement of at least 80%; or 3.1 minimum threshold for average weekly face-to-face contacts as demonstrated through encounter reporting.</p> <p>Self-reporting by the provider is insufficient and the contractor shall develop and implement an internal review process to evaluate fidelity of weekly face-to-face contacts.</p>	<ul style="list-style-type: none"> <li>Mercy Maricopa Integrated Care (Mercy Maricopa) key staff met with ACT provider CEO's on 9/19/16 to review Notice to Cure, required action to validate provider reported face-to-face data with claims.</li> <li>Mercy Maricopa key staff met with AHCCCS for technical assistance on 10/17/16 to confirm claim calculation for the average face-to-face weekly contacts and review claim report limitations including the roll up of multiple contacts to one claim line and inability to capture all face-to-face contacts due to billing restrictions.</li> </ul>	<ul style="list-style-type: none"> <li>Blythe FitzHarris</li> <li>Blythe FitzHarris</li> </ul>	<ul style="list-style-type: none"> <li>Review Notice to Cure face-to-face contract expectations and requirements with ACT providers.</li> <li>Evaluate and complete modifications to weekly face-to-face claim report to ensure alignment with AHCCCS requirements.</li> </ul>

Area	Required Action	Actions Completed	Person Responsible	Action Steps to be completed by 1/6/17
		<ul style="list-style-type: none"> <li>• Mercy Maricopa Quality Management department began face- to -face chart audit on 10/17/16 to evaluate contacts in chart compared to claim report post 180 days.</li>   <li>• Developed claim validation process with implementation scheduled to begin 11/1/16.</li> </ul>	<ul style="list-style-type: none"> <li>• Amy Hadley</li>   <li>• Christie MacMurray/Alisa Randall</li> </ul>	<ul style="list-style-type: none"> <li>• Conduct chart reviews to identify estimated contacts not currently being captured in a claim report due to roll up billing based on a 180 day lag, as well as proportion of same day behavioral health medical practitioner and nursing visits.</li>   <li>• Develop and implement internal review process to evaluate weekly claim face-to-face contacts that will include comparison of claim to monthly provider Electronic Health Record (EHR) report, provision of technical assistance to address compliance on claim submission processes and face-to-face contact requirements.</li> </ul>

Area	Required Action	Actions Completed	Person Responsible	Action Steps to be completed by 1/6/17
		<ul style="list-style-type: none"> <li>• Corrective Action submitted to three providers for lack of compliance in August 2015.</li> <li>• Corrective Actions submitted to four providers due to low Nature of Service Fidelity Score performance in August 2015.</li> </ul>	<ul style="list-style-type: none"> <li>• Alisa Randall/Christie MacMurray</li> </ul>	<ul style="list-style-type: none"> <li>• Utilize performance improvement activities which may include but are not limited to provider sanctions or other contract remedies to address average weekly face-to-face contract performance.</li> </ul>
<b>ACT Fidelity requirement of at least 80% for weekly face-to-face contacts</b>	<p>AHCCCS expects that the contractor will ensure services provided by the ACT teams are compliant with the fidelity requirement of at least 80%; or 3.1 minimum threshold for average weekly face-to-face contacts as demonstrated through encounter reporting. Self-reporting by the provider is insufficient and the contractor shall develop and implement an internal review process to evaluate fidelity of weekly face-to-</p>	<ul style="list-style-type: none"> <li>• Onsite technical assistance has been scheduled for teams to review ACT model and ensure processes are in place to ensure fidelity to the model.</li> <li>• Meetings have been completed with and or scheduled with three providers to address fidelity score decreases.</li> </ul>	<ul style="list-style-type: none"> <li>• Christie MacMurray</li> <li>• Christie MacMurray</li> </ul>	<ul style="list-style-type: none"> <li>• Mercy Maricopa to provide onsite technical assistance to ACT teams to review and ensure processes are in place regarding scheduling and monitoring team face-to-face contacts.</li> <li>• Mercy Maricopa actively participates in all Fidelity review calls, records and trends by ACT team all fidelity metrics by team, year</li> </ul>

Area	Required Action	Actions Completed	Person Responsible	Action Steps to be completed by 1/6/17
	face contacts.	<ul style="list-style-type: none"> <li>Meetings with ACT provider CEOs started in May 2016.</li> </ul>	<ul style="list-style-type: none"> <li>Christie MacMurray/Alisa Randall</li> </ul>	<p>and overall performance. To address trends, Mercy Maricopa shares fidelity data in the ACT Clinical Coordinators meeting and ACT Psychiatrist meetings. In addition, to address ACT teams who have lower scores from the prior year, Mercy Maricopa meets with the Executive leadership of the ACT provider to review, address score changes and request a plan of action.</p> <ul style="list-style-type: none"> <li>Hold monthly meetings with CEO's and Regional staff to discuss concerns with fidelity in regards to low fidelity in the frequency of contact (face-to-face encounters).</li> </ul>

Area	Required Action	Actions Completed	Person Responsible	Action Steps to be completed by 1/6/17
		<ul style="list-style-type: none"> <li>• The first Quality Action Plan review occurred the week of March 21, 2016 – March 25, 2016.</li> <li>• Second reviews occurred May 11, 2016 – May 13, 2016.</li>   <li>• To date meetings have occurred with six ACT providers who have finalized results for this year’s review process.</li> </ul>	<ul style="list-style-type: none"> <li>• Christie MacMurray/ Alisa Randall</li>   <li>• Christie MacMurray/ Alisa Randall</li>   <li>• Christie MacMurray/ Alisa Randall</li> </ul>	<ul style="list-style-type: none"> <li>• Conduct individual provider Quality Action Plan reviews which focuses on nature of services and other metrics from ACT General Organization Index (GOI).</li>   <li>• Schedule fidelity action plan review meetings up to four times a year with ACT teams to review and discuss any individual metrics that fall below the 80% threshold.</li>   <li>• Complete 6 month post nature of service fidelity reviews on teams with prior completed reviews.</li> </ul>

Area	Required Action	Actions Completed	Person Responsible	Action Steps to be completed by 1/6/17
		<ul style="list-style-type: none"> <li>• Corrective Actions submitted to four providers due to Nature of Service Fidelity Score performance were issued August 2015.</li> </ul>	<ul style="list-style-type: none"> <li>• Alisa Randall/Christie MacMurray</li> </ul>	<ul style="list-style-type: none"> <li>• Utilize performance improvement activities which may include but are not limited to provider sanctions or other contract remedies to address face-to-face average weekly contact below the minimum 80% threshold.</li> </ul>
<b>Substance Abuse Specialist</b>	<p>The Contractor must meet and maintain required staffing to ensure that each ACT team employs two Substance Abuse Specialists that meet the full fidelity requirements of the position; Identify strategies to improvement recruitment and hiring of qualified staff to achieve sustained compliance</p>	<ul style="list-style-type: none"> <li>• Met with all ACT CEO's on 9/19/16 to review Notice to Cure and expectations to hire Substance Abuse Specialist (SAS) staff in the next 90 days.</li> <li>• Mercy Maricopa issued additional dollars to support the hiring of two Substance Abuse Specialists per team on May, 2016.</li> <li>• The first Quality Action Plan review occurred the week of March 21, 2016 – March 25,</li> </ul>	<ul style="list-style-type: none"> <li>• Blythe FitzHarris</li> <li>• Christie MacMurray/ Alisa Randall</li> </ul>	<ul style="list-style-type: none"> <li>• Reviewed Notice of Cure requirements for the hiring of Substance Abuse Specialist (SAS) with the ACT provider CEOs.</li> <li>• Developed and implement a Quality Action Plan which reviews competency for each ACT team member</li> </ul>

Area	Required Action	Actions Completed	Person Responsible	Action Steps to be completed by 1/6/17
		<p>2016.</p> <ul style="list-style-type: none"> <li>• Second reviews occurred May 11, 2016 – May 13, 2016.</li> <li>• Mercy Maricopa has been collecting weekly data on Substance Abuse Specialist (SAS) positions since May 2015. As of today, 34 out of 48 potential SAS positions meet the SAMSHA requirement (71%).</li> </ul>	<ul style="list-style-type: none"> <li>• Christie MacMurray</li> <li>• Christie MacMurray/ Alisa Randall</li> </ul>	<p>position inclusive of the Substance Abuse Specialist (SAS) to ensure they have the requisite skills necessary to provide specialty services to members and cross train other team members.</p> <ul style="list-style-type: none"> <li>• Collect weekly provider data on the status of recruitment, hiring and securing of Substance Abuse Specialist (SAS) positions.</li> <li>• ACT providers to complete performance improvement plans which identify plans</li> </ul>

Area	Required Action	Actions Completed	Person Responsible	Action Steps to be completed by 1/6/17
			<ul style="list-style-type: none"> <li>Alisa Randall/Christie MacMurray</li> </ul>	<p>to hire, recruit and retain Substance Abuse Specialist (SAS).</p> <ul style="list-style-type: none"> <li>Implement performance improvement activities which may include but are not limited to provider sanctions and contract remedies for continued non-compliance with the required Substance Abuse Specialist (SAS) requirements.</li> </ul>
<b>Claim Submission Requirements</b>	<p>The Contractor shall ensure that all reported face-to-face contracts aligns with provider claims data by ensuring claims are filed per face-to-face contact, in accordance with submission requirements for claim filling; future reporting of face-to-face</p>	<ul style="list-style-type: none"> <li>Technical assistance has been provided to align providers with the billing guidelines – CPT/HCPCS codes, and appropriate Provider combinations (Pay-To and Rendering) to comply with submission requirements.</li> </ul>	<ul style="list-style-type: none"> <li>Brad Hargens</li> </ul>	<ul style="list-style-type: none"> <li>Providers not submitting claims within the two week threshold will be assigned support from the Practice Innovation Institute to implement business strategies to begin submitting claims within two weeks.</li> </ul>



Area	Required Action	Actions Completed	Person Responsible	Action Steps to be completed by 1/6/17
	<p>performance will only include filed claims data. Self-reported data will no longer be viewed by AHCCCS.</p>	<ul style="list-style-type: none"> <li>Mercy Maricopa held individual meetings with all ACT providers between September 26, 2016 and September 30, 2016 to review claims and identify trend errors.</li> </ul>	<ul style="list-style-type: none"> <li>Alisa Randall/Brad Hargens</li> <li>Brad Hargens</li> </ul>	<ul style="list-style-type: none"> <li>Mercy Maricopa will meet with ACT team providers and provide technical assistance to address claim submission concerns identified monthly thru the claim validation process.</li> <li>Mercy Maricopa provides ongoing education to staff and providers on claims submission requirements, coding, updates electronic claims transactions and electronic fund transfer; and available Mercy Maricopa resources such as provider manuals, web site and fee schedules.</li> </ul>
<b>Fidelity Requirements</b>	<p>The Contractor must meet and maintain sustained compliance for all fidelity requirements.</p>		<ul style="list-style-type: none"> <li>Blythe FitzHarris</li> </ul>	<ul style="list-style-type: none"> <li>Mercy Maricopa to meet with AHCCCS to determine the specific requirements for sustained compliance.</li> </ul>

Area	Required Action	Actions Completed	Person Responsible	Action Steps to be completed by 1/6/17
			<ul style="list-style-type: none"> <li>• Christie MacMurray/ Alisa Randall</li>   <li>• Christie MacMurray/ Alisa Randall</li>   <li>• Amy Hadley</li>   <li>• Alisa Randall/Blythe FitzHarris</li> </ul>	<ul style="list-style-type: none"> <li>• Mercy Maricopa actively participates in all Fidelity review calls, records and trends fidelity metrics by provider, year and overall performance.</li>   <li>• Mercy Maricopa will continue to provide technical assistance to address fidelity trends.</li>   <li>• Mercy Maricopa Quality Management Department conducts six month post fidelity reviews and requires providers to submit self-monitoring and improvement plans</li>   <li>• Mercy Maricopa will utilize performance improvement activities which may include but are not limited</li> </ul>

Area	Required Action	Actions Completed	Person Responsible	Action Steps to be completed by 1/6/17
				to provider sanctions and other contract remedies.