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Owner: Maha Sulaiman
Policy Area: Utilization Management
References: [NCQA UM4 Element E](#)
[Appropriate Professionals](#)

Utilization Management Affirmative Statement

POLICY

Detroit Wayne Mental Health Authority (DWMHA) ensures that annually an affirmative statement about incentives to all enrollee/members and to all practitioners and providers and employees who make Utilization Management (UM) decisions is distributed. UM decisions are based only on the appropriateness of care and services, as well as the existence of coverage. No Physicians (MD OR DO) nor any other UM staff are rewarded for issuing denials of coverage or service or reducing the provision of care which is deemed medically necessary.

PURPOSE

To document Affirmative Statement. The DWMHA is a governmental entity and is funded by tax revenues; primarily through the Medicaid program. DWMHA Representatives are expected to protect and preserve these scarce resources and ensure they are used efficiently and only for lawful and proper purposes.

APPLICATION

This policy applies to DWMHA staff, Access Center, Crisis Service Vendor staff, Managers of Comprehensive Provider Network staff, Integrated Care Organizations, Contractual staff, Network and Out of Network provider staff. This policy serves all populations: Adults with Severe Mental Illness (SMI), Children with Serious Emotional Disturbance (SED), Persons with Intellectual/Developmental Disabilities (I/DD) and Persons with Substance Use Disorders (SUD) and all funding streams and waiver programs such as MI Health Link, SUD, Autism Spectrum Disorder and Medicaid.

KEY WORDS

1. Access Center
2. Affirmative Statement
3. Crisis Service Vendor
4. Managed Care Provider Network (MCPN)
5. Medical Necessity

STANDARDS

1. The Affirmative Statement includes narrative addressing the following:
 - a. UM decision making is based only on appropriateness of care, service and existence of coverage; and
 - b. DWMHA, Access Center, Crisis Service Vendor, and MCPNs do not reward practitioners or other individuals for issuing denials of coverage or service care; and
 - c. No Physicians (MD OR DO) nor any other staff making UM decisions are rewarded for issuing denials of coverage or service or reducing the provision of care which is deemed medically necessary.
2. The Affirmative Statement is documented and distributed to all employees of DWMHA, Access Center, Crisis Service Vendor, and MCPN employees that perform UM functions in one or more of the following ways:
 - a. DWMHA:
 1. New employee orientation material
 2. Annual face-to-face Code of Conduct/Affirmative Statement information session
 3. Employee Handbook
 4. Website: dwmha.com
 - b. Access Center, Crisis Service Vendor and MCPNs
 1. New employee orientation material
 2. Annual DWMHA broadcast of need to review Affirmative Statement
 3. Provider contracts
 4. Provider Manual
 5. Website: dwmha.com
3. The Affirmative Statement is documented and distributed to members in one or more of the following ways:
 - a. Member handbook for new members or upon request.
 - b. Member communication, notifying members of Affirmative Statement and that it is available in the member handbook and on the website.
 - c. Website: dwmha.com
4. DWMHA, Access Center, Crisis Service Vendor, and MCPN's will maintain evidence of dissemination for all groups and be prepared to share with regulatory entities during site visits. Evidence will include new hire materials, Member Handbook, Employee Handbook, member newsletters, Provider Manual, DWMHA website, contracts, broadcasts or signed Affirmative Statements in employee files.
5. DWMHA members and representatives can report any issue and ask questions of DWMHA's Compliance Officer, postal mail or telephone.
6. **Detroit Wayne Mental Health Authority Compliance Office**
707 W. Milwaukee, 5th Floor
Detroit, MI 48202

Phone: 313-421-8848

7. Reported complaints can be done anonymously. If the representative identifies him or herself, DWMHA will maintain anonymity to the extent provided by law.
8. Complaints may also be reported to the Office of Inspector General by postal mail or telephone:
Michigan Department of Health and Human Services Office of Inspector General
PO Box 30062
Lansing, MI 48909
Phone: 855-MI-Fraud (643-7283)

QUALITY ASSURANCE/IMPROVEMENT

1. The DWMHA shall review and monitor contractor adherence to this policy as one element in its network management program, and as one element of the Quality Assessment Performance Improvement Program (QAPIP) Goals and Objectives.
2. The quality improvement programs of MCPNs, their subcontractors and direct contractors must include measures for both the monitoring of and the continuous improvement of the programs or processes described in this policy.
3. DWMHA Personnel Department will ensure that the Affirmative Statement is part of New Hire Orientation, discussed in the annual face-to-face Code of Conduct/Affirmative Statement information sessions, and included in the employee handbook.
4. The DWMHA Director of Communications will ensure the Affirmative Statement is on the dwmha.com website for public viewing.
5. DWMHA Customer Service Department will ensure members are notified of the Affirmative Statement by inclusion in the "Persons Points of View" member newsletter at least annually, in the "MI Health Link Handbook for the Medicare & Medicaid Enrollee" and in the DWMHA Member Handbook.
6. MCPNs, Crisis Service Vendors, and Access Center will track dissemination of the Affirmative Statement and upon request provide proof of it's inclusion in New Hire Orientation, annual review, and provider contracts.
7. DWMHA Quality Management division will include the Affirmative Statement when reviewing employee files during annual site reviews.
8. The DWMHA Director of Managed Care Operations will ensure the Affirmative Statement will be included in the Provider Manual, in new provider contracts and in amendments to existing provider contracts.

COMPLIANCE WITH ALL APPLICABLE LAWS

Authority staff, MCPNs, contractors and subcontractors are bound by all applicable local, state and federal laws, rules, regulations and policies, all federal waiver requirements, state and county contractual requirements, policies, and administrative directives, as amended.

LEGAL AUTHORITY

1. Contract between United States Department of Health and Human Services, Center for Medicare & Medicaid Services in Partnership with the State of Michigan and the Integrated Care Organizations, November 1, 2016 (The Three Way Contract)

2. MDHHS and DWMHA Contract, October 1, 2016

RELATED POLICIES

1. Compliance Plan
2. Compliance Reporting Policy
3. Conflict of Interest Policy
4. Investigation Policy
5. Standards of Conduct
6. Fraud Waste and Abuse Policy

RELATED DEPARTMENTS

1. Children's Initiatives
2. Clinical Practice Improvement
3. Compliance
4. Customer Service
5. Information Technology
6. Integrated Health Care
7. Legal
8. Managed Care Operations
9. Management & Budget
10. Personnel
11. Purchasing
12. Quality Management
13. Utilization Management
14. Recipient Rights
15. Substance Use Disorders

CLINICAL POLICY

NO

INTERNAL/EXTERNAL POLICY

EXTERNAL

Attachments:

[Affirmative Statement.docx](#)

Approval Signatures

Approver	Date
Ronald Hocking: Chief Operating Officer	05/2017
Dana Lasenby: Deputy Chief Operating Officer [AS]	05/2017
Allison Smith: Project Manager, PMP	05/2017
Darlene Owens: Director, Substance Use Disorders, Initiatives	05/2017
Julia Kyle: Director of Integrated Care	05/2017
Lorraine Taylor-Muhammad: Director, Managed Care Operations	04/2017
William Sabado	04/2017
Kip Kliber: Director, Recipient Rights	04/2017
Mary Allix	04/2017
Michele Vasconcellos: Director, Customer Service	04/2017
Corine Mann: Chief Strategic Officer/Quality Improvement	04/2017
Bessie Tetteh: CIO	04/2017
Rolf Lowe: Assistant General Counsel/HIPAA Privacy Officer	04/2017
Jody Connally: Director, Human Resources	04/2017
Stacie Durant: CFO Management & Budget	04/2017
crystal Palmer: Director, Children's Initiatives	04/2017
Carmen McIntyre: Chief Medical Officer	04/2017
Sarah Sharp: Consultant	04/2017
Diana Hallifield: Consultant	03/2017
Maha Sulaiman	03/2017



DETROIT WAYNE MENTAL HEALTH AUTHORITY

UTILIZATION MANAGEMENT

AFFIRMATIVE STATEMENT

Detroit Wayne Mental Health Authority (DWMHA) ensures that an affirmative statement about incentives is distributed to all enrollee/members, to all practitioners and providers, and to all employees who make Utilization Management (UM) decisions.

All Access Center, Crisis Service Vendor and MCPN practitioners and employees who make Utilization Management decisions understand the importance of ensuring that all consumers receive clinically appropriate, humane and compassionate services of the same quality that one would expect for their child, parent or spouse by affirming the following:

Utilization Management decision making is based only on appropriateness of care, service, and existence of coverage.

DWMHA, Access Center, Crisis Service Vendor, and MCPNs do not reward practitioners or other individuals for issuing denials of coverage or service care.

No Physicians nor any other staff making UM decisions are rewarded for issuing denials of coverage or service or reducing the provision of care which is deemed medically necessary.