



Salt Lake County

FY2019 Quality Assessment and Performance
Improvement (QAPI) Plan

Optum Salt Lake County Approval

Tracy Luoma
Executive Director, Optum Salt Lake County

Date

Connie Mendez, L.C.S.W.
Deputy Director, Optum Salt Lake County

Date

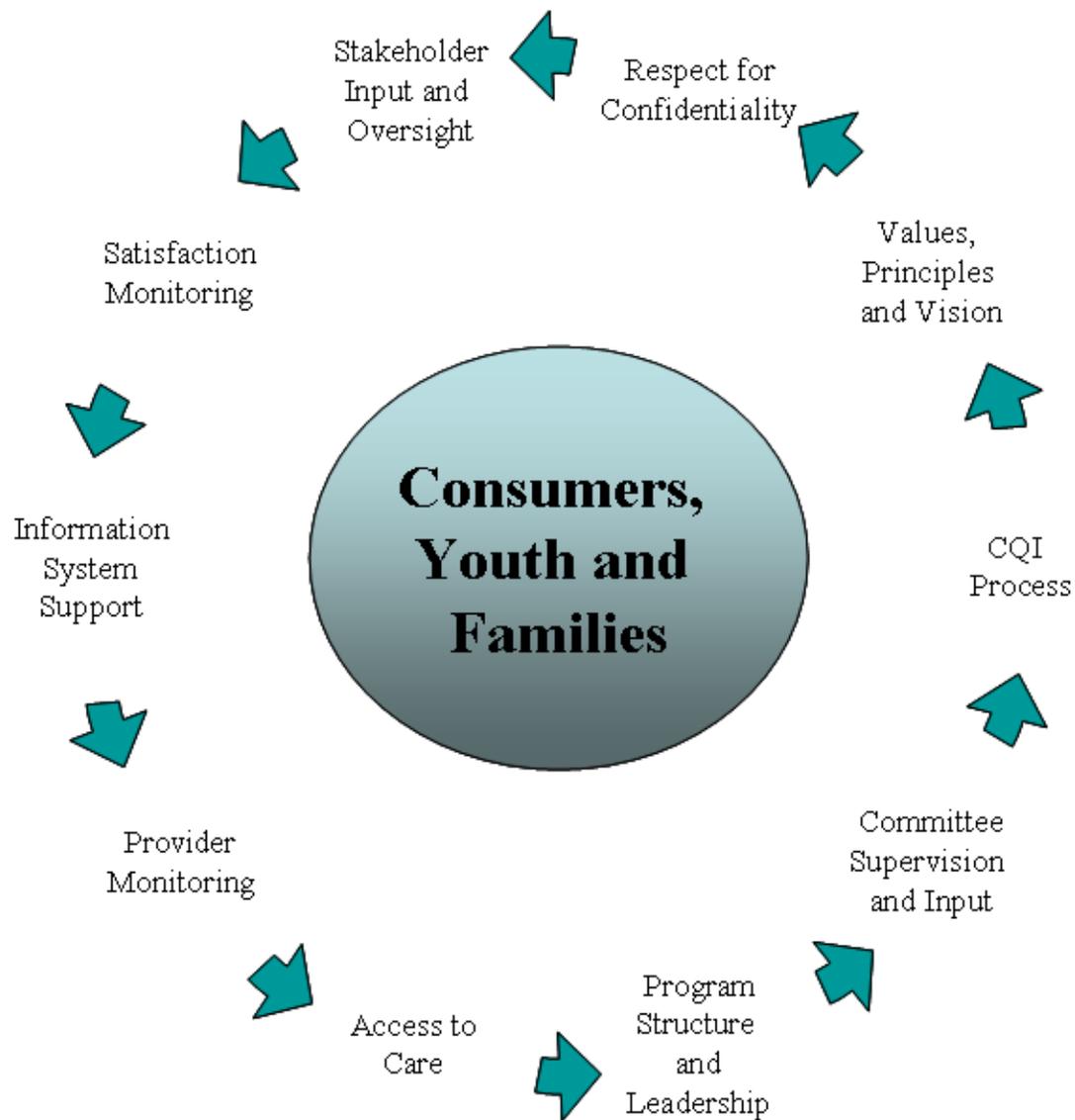
Gina Attallah, L.C.S.W.
Clinical Quality Manager, Optum Salt Lake County

Date

Salt Lake County Division of Behavioral Health Services Approval

Tim Whalen, LCSW
Director, Mental Health
Salt Lake County Division of Behavioral Health Services

Date



**At the Center of all Quality
 Assessment and Performance Improvement (QAPI)
 Efforts are the Consumers, Youth and Families we Serve.**

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I. INTRODUCTION AND MISSION/VISION

For Optum, Quality Assessment and Performance Improvement (QAPI) is not a department, but a central tenet in the way we conduct all aspects of our operation. We are continually monitoring multiple areas of our performance; our impact on consumers, youth and families and on providers; and constantly looking for ways to improve. The core goals of our QAPI Plan are straightforward: greater levels of recovery and improved resiliency for consumers, youth and families. To achieve these goals, Optum SLCo has structured a comprehensive QAPI Plan that provides the framework for continuous monitoring and evaluation of all aspects of mental healthcare delivery and service.

The QAPI program promotes recovery and resiliency in the following ways:

- **Communication** with consumers, youth, families, providers and other stakeholders, a current and accurate understanding of needs in the system. Optum seeks to empower individuals and families to live in their communities with health & wellness, dignity, security, and hope.
- **Performance Measurement** focuses on indicators of recovery and resiliency in addition to monitoring clinical and administrative oversight functions. Therefore, interventions to improve quality will center on efforts to increase recovery of adults and build resiliency in youth and families. These performance measures are further demonstrated by specific metrics outlined in the QAPI Work Plan.
- **Consumer and Family Involvement in Planning and Goal Setting** Consumers and family members (as appropriate) are involved in development of recovery and resiliency goals. Consumer and family involvement is monitored through audits of clinical records and feedback from consumers and family members through a variety of communication avenues.
- **Systems are improved through Performance Improvement Projects** The Performance Improvement Project process is built upon Optum's values of Recovery and Resiliency. Consumers, family members, advocates, medical providers and mental health professionals work together to identify systems in need of change, gather and study related data, develop resolutions with an emphasis on recovery and resiliency, then follow and monitor the implementation of solutions to ensure effectiveness and efficiencies and make adjustments as needed.

Our mission is to help people live their lives to the fullest. The organizational vision is to be a constructive and transformational force in the healthcare system. Core principles that were adopted to aid employees in living the mission and reaching the vision are as follows:

- Ethical Conduct - Do the right thing at all times.
- Customer Focus - Define our success by the quality, value, and service we provide.
- Diversity - Conduct every interaction with members and each other with an awareness, sensitivity, understanding and respect for differences in race, ethnicity, language, gender, age, religion, national origin, socioeconomic status and disability status.
- Positive & Respectful Work Environment - Treat every employee, every customer, every family member and caregiver, and every vendor with respect. Demonstrating a positive attitude is the first step.
- Accountability - Take responsibility for our actions and targets, and consider how personal efforts affect co-workers, our workplace and our customers.
- Success - Operate a profitable, growing, disciplined and well-run organization.

Optum is committed to fulfilling this mission and to provide evidence-based behavioral health and wellness programs that empower the people we serve to lead healthier and more productive lives. The QAPI program's mission is to support the Optum mission, vision and values by effectively managing the quality of health care and services delivered. To accomplish this mission, Optum SLCo tracks behavioral healthcare outcomes and consumer satisfaction through collaborative relationships with our consumers, providers and other stakeholders. This includes monitoring of contracted provider performance through ongoing clinical collaboration, analysis of utilization and clinical data, and evaluation of consumer satisfaction and dissatisfaction. Optum supports the efforts of its providers through information analysis, education, administrative support, and its behavioral health management expertise. Furthermore, Optum assures exemplary customer service by offering comprehensive behavioral healthcare products supported by reliable operations.

II. GOALS OF THE QAPI PROGRAM

The overall goals of the QAPI program for Optum SLCo remain ongoing as we continue to strive to improve the quality of care and services delivered to consumers, promote safe clinical practices, improve satisfaction, enhance cultural responsiveness, and meet the needs and expectations of consumer, providers and other stakeholders. In order to achieve its overall goals, the QAPI Program strives to:

- A. Build partnerships with consumers, providers and other stakeholders and involve them in the planning and development of the QAPI program.
- B. Ensure timely access to mental health services that are clinically sound, based on the most current and prevalent clinical knowledge, practices, and technology, and are provided by appropriately trained and qualified professionals.
- C. Increase consumer voice, choice and satisfaction.
- D. Improve collaboration with the primary care and criminal justice systems.
- E. Ensure consumers' confidentiality is maintained at all times, and services are provided in compliance with all local, state and federal mandates.
- F. Afford consumers their rights and the dignity they deserve in receiving care through Optum SLCo programs.
- G. Design mechanisms to improve patient safety practices with providers.
- H. Develop and maintain QAPI resources, structures and processes that support Optum SLCo.
- I. Assure quality functions are deployed across all segments of Optum SLCo.
- J. Identify root causes of problems that produce poor quality and encourage "best practices" through QAPI monitoring and evaluation activities

III. QAPI PURPOSE AND PROCESS

The QAPI process provides the mechanism by which barriers to delivering optimal mental health care and substance use disorder treatment services can be identified, opportunities prioritized, and interventions implemented and evaluated for their effectiveness in improving performance. The QAPI Manager, Medical Director, and Executive Director, with support of the QAPI Committee, are charged with the effective implementation of this process.

The purpose of the QAPI program is to implement within the organization policies and procedures that ensure the highest quality of care and services for consumers. The QAPI program provides a system for objective and systematic monitoring and evaluation of the quality, appropriateness, efficiency and effectiveness of clinical care and service delivered.

Quality Improvement is the integrative process that links knowledge, structure and processes together throughout the Optum SLCo organization and addresses the activities undertaken to improve the quality and safety of clinical care and the quality of service provided to consumers.

The QAPI program has been developed to incorporate Continuous Quality Improvement (CQI) process consisting of ongoing analysis of clinical data and program results, identifying and prioritizing opportunities for improvement, implementing interventions and evaluating the effectiveness of those interventions on the quality of care and services. The CQI process is supported by the QAPI Plan, Work Plan and Annual Work Plan Evaluation. This allows Optum SLCo to determine what it intends to accomplish and measure the impact of any changes that are made. Through focused attention on tracking, trending, periodic monitoring, and analysis of care and service, the QAPI program and its associated activities can be reviewed and updated to be consistent with current business needs and the needs of the consumers.

- *Annual QAPI Work Plan*

QAPI activities are implemented in accordance with an Annual QAPI Work Plan, under the oversight of the QAPI Committee. The Work Plan is reviewed and approved by the QAPI Committee. All clinical QAPI Activities are developed and implemented with continuous and substantial involvement of practicing mental health clinicians, consumers, family members and advocates, under the direction of the Medical Director and the QAPI Manager. (SLC Contract, Section A, 9.A.2)

- *Data Collection and Analysis*

Opportunities for improvement are continuously identified and addressed through a systematic process. Recognized important aspects of care and service are routinely monitored, and Optum SLCo's performance is evaluated against appropriate benchmarks or performance goals. Data is collected through a number of sources, including the Optum SLCo Management Information System (MyAvatar), provider satisfaction surveys, state consumer satisfaction surveys (such as MHSIP, YSS and YSS-F), geo-mapping analysis, consumer complaints, administrative and clinical review site visits, and credentialing information.

- *Barrier Analysis*

When quality of care or services does not meet the expected standards, a barrier analysis is conducted to assess the reasons for the identified deficiencies. Techniques used to determine the barriers or root causes for the results may include the collection of additional data, stratification of the data, or analysis of subgroup data in order to drill down sufficiently to understand the reasons for the results. Common techniques of QAPI such as brainstorming, cause-and-effect diagramming, identification of key factors, and others are used to identify barriers to improvement. Citations from literature that contain information about barriers to performance that have already been identified may also be used.

- *Interventions*

In accordance with the barrier analysis, opportunities for improvement are identified and prioritized focusing on variables that can result in improved performance. Appropriate interventions are deliberated,

selected, and implemented to overcome the barriers. Interventions are recommended by the QAPI Committee structure.

- *Evaluation of Effectiveness*

All interventions and corrective actions are followed by re-assessment or re-measurement to evaluate the effectiveness of the intervention. Trends are identified and analyzed to determine their significance. Causal links between the interventions and the results that are observed are examined. Interventions that influenced the outcome, with differentiation of those that were most influential, are identified including any intervening or confounding factors that may have contributed to any changes that occurred.

- *Communication of Results*

Results of QAPI program activities are communicated to internal stakeholders, such as Optum SLCo operational units, and externally to consumers and families, Salt Lake County Division of Behavioral Health Services (DBHS) Behavioral Health Advisory Board; contractors and other stakeholders as appropriate.

- *Provider Involvement*

Provider involvement is an important aspect of Optum SLCo's QAPI process. Optum SLCo obtains and incorporates input and representation from providers in a number of ways at various levels of its QAPI structure. Foremost in this process is the Provider Advisory Committee, comprised of a range of mental health providers representing a variety of specialties. The Provider Advisory Committee supports QAPI by providing input and expertise relative to clinical issues, including implementation of mandated clinical Performance Improvement Projects, practice guidelines and evidence-based/promising practices, preventive health programs, and coordination and continuity of care across the healthcare continuum.

IV. SCOPE OF THE QAPI PROGRAM

The scope of the QAPI program encompasses all segments of Optum SLCo, including care management, care coordination, network management, credentialing, recovery and resiliency, provider relations, information technology and QAPI. The population affected includes all consumers, youth and families accessing mental health and SUD services at all levels of care, including crisis intervention, inpatient care, residential treatment, outpatient services, and American Society of Addiction Medicine (ASAM) levels of care. Aspects of service and care are measured against established performance goals. Key monitors are measured and trended on a quarterly and/or annual basis. The QAPI Committee analyzes the performance to identify and follow-up on areas of opportunity. Optum SLCo continually identifies opportunities for improvement and uses the following criteria to prioritize opportunities:

- Aspects of care occurring most frequently or affecting large numbers of consumers
- Diagnoses associated with high rates of morbidity or disability if not treated in accordance with accepted community standards
- Issues identified from local demographic and epidemiological data
- Access to care
- Stakeholder expectations
- Regulatory requirements
- Availability of data
- Ability to impact the problem
- Available resources
- Critical incidents
- Audit Findings

A. *Important aspects of service and care monitoring*

Specific aspects of service and care monitored through the QAPI program are listed in the QAPI Work Plan. QAPI activities are imbedded in all Optum core processes. Services provided to consumers, youth and families are implemented at a local level, assuring that the needs of the local delivery system are met. Specific metrics are established in the QAPI Work Plan which can be updated throughout the year to reflect progress on QAPI activities and input from the healthcare delivery system.

Data trends and efforts related to improvement actions are reported during QAPI Committee Meetings and in the Annual QAPI Work Plan Evaluation. If a continuous aspect of service and care being monitored does not meet a performance goal, Optum conducts an analysis of barriers and opportunities for improvement and implements actions to improve performance and meet the goal by an established date. The results of those actions are also reviewed for effectiveness.

B. *Performance Improvement Projects*

As further defined in Policy QA-03 Performance Improvement Projects, the QAPI Committee annually prioritizes activities, endorses or re-endorses policies and procedures and continually monitors for improvement (SLC Contract, Attachment D, 1.1.1.A). To ensure an adequate scope of QAPI activities, Optum SLCo assesses the demographic characteristics and health risks of its covered population to implement and prioritize Performance Improvement Projects (PIPs) that reflect the health needs of significant groups within the covered population. In addition, the QAPI Committee will implement any PIP topics specified by Salt Lake County, the Utah Department of Health and/or CMS contractors (SLC Contract, Attachment D, 1.1.4). Quality activities are also developed in collaboration with the support of providers, consumers, their families and consumer advocates. PIPs are implemented in accordance with CMS' protocol for conducting PIPs, including:

1. measurement of performance using objective quality indicators
2. implementation of system interventions to achieve improvement in quality;
3. evaluation of the effectiveness of the interventions; and
4. planning and initiation of activities for increasing or sustaining improvement.

Implementation of new PIPs or any significant changes proposed to existing PIPs will be subject to approval. As such, reports reflecting new or changing PIPs will be submitted to Salt Lake County and/or the Utah Department of Health prior to execution (SLC Contract, Attachment D, 1.1.4.C).

C. *Peer Reviews*

Optum monitors provider and facility adherence to quality standards via site visits and ongoing review of complaints, adverse events and sanctions and limitations on licensure. The purpose of the Peer Review program is to monitor accessibility, quality, adequacy and outcomes of services delivered.

Optum performs audits of network providers to review clinical and administrative policies and procedures, clinical records against standards, adherence to timely access to care requirements, and administrative practices for the purpose of monitoring compliance with the Optum SLCo contract, including state and federal requirements. If the practitioner or facility treatment record review fails to meet an established goal, corrective action, training and/or a re-audit may be required. Follow-up reviews measure progress on corrective actions until the goal is met or until the provider is terminated from the network. Results of practitioner and facility treatment record reviews are included in practitioner and facility credentialing /recredentialing files.

Practitioner and facility credentialing/recredentialing files also include information on complaints and findings of adverse events, sanctions and limitations on licensure for consideration during the credentialing/recredentialing process.

D. Level of Care Guidelines and Preferred Practice Guidelines

Optum provides Level of Care (LOC) Guidelines and adopts Preferred Practice Guidelines as tools to assist providers and Care Advocates in determining the appropriate type and level of care for consumers. LOC Guidelines guide utilization management determinations by standardizing utilization management decisions regarding the most appropriate and available level of care needed to treat a consumer's presenting problems. Preferred Practice Guidelines establish practice standards for the effective treatment of major DSM diagnostic categories. The LOC Guidelines are developed by Optum clinical staff and credentialed providers and are based on their shared knowledge of sound clinical practice, as well as published research. Preferred Practice Guidelines are developed by the Division of Substance Abuse and Mental Health (DSAMH) and recognized by PMHP contractors. (SLC Contract, Attachment B, 12.5). DSAMH guidelines are supplemented by guidelines adopted from external, nationally recognized organizations such as the American Psychiatric Association and the Academy of Adult and Adolescent Psychiatry. Guidelines are reviewed at least annually and updated as necessary to reflect information revealed through published scientific findings, clinical practice and clinician input as solicited by Optum. LOC Guidelines and Preferred Practice Guidelines are available to all Optum providers, facilities, consumers, families, advocates and the general public on the Optum SLCo Website. These documents are available on paper by request for providers, consumers and others.

E. Reviews for Underutilization and Overutilization

Utilization data are monitored on an ongoing basis by the Utilization Management Committee. This is accomplished through system reports that compare the data on an aggregate level and by provider type. Data are quantitatively and qualitatively analyzed and trended to monitor for under-utilization and over-utilization. In the event that a particular utilization metric falls outside established control limits, the data are further analyzed at the consumers, practitioner, and facility levels. When relevant, appropriate actions are implemented and measured to address issues with under-utilization or over-utilization. (SLC Contract, Attachment D 1.1.2.A.3)

F. Satisfaction Surveys

An assessment of consumer satisfaction is conducted at least annually (SLC Contract, Attachment E, 12.5). Satisfaction surveys are conducted at a regular frequency with at least one (1) consumer satisfaction survey conducted annually using surveys such as the Mental Health Statistics Improvement Program (MHSIP), Youth Services Survey (YSS) and Youth Services Survey-Family (YSS-F). This assessment is based on a survey of a sample of consumers who received services through from the Optum SLCo Provider Network within a 4 week period of time each year. Results are analyzed at least annually in the QAPI Committee. As opportunities to improve satisfaction are identified and prioritized, interventions are implemented and analyzed for their effectiveness and the need for further action.

The Network Services Department conducts the annual Provider Satisfaction Survey and the results are reviewed by the QAPI Committee and the Provider Advisory Committee. Both committees analyze the survey results and work with Network Services staff to identify opportunities for improvement and implement actions to improve satisfaction.

G. Timely Access to Care

Optum SLCo maintains business hours to facilitate easy access to authorizations and other services (SLC Contract, Attachment B, 10.1.3). In addition, Optum SLCo consistently reviews and monitors its processes to ensure that access to necessary covered mental health services occurs within acceptable timeframes, as specified within policy *Access Standards and Care Advocacy Center Hours of Operation*.

Network practitioners and facilities are expected to track access to care when a member contacts them directly for mental health services. Optum SLCo monitors network practitioners and facilities to ensure compliance with access standards, and requires corrective actions if there is failure to comply (SLC Contract, Attachment B, 10.4.4). Optum SLCo gathers both internal and external data to conduct ongoing monitoring of timely access to care, and the results are reviewed by the QAPI Committee. The QAPI Committee analyzes the results and works with operational staff to identify opportunities for improvement and implement actions to improve access to care.

H. Training and Orientation

Optum SLCo staff are provided the necessary training to enable them to perform their jobs effectively. Topics covered in the training program include, but are not limited to:

- Confidentiality (HIPAA and other Federal and State Regulations)
- Regulatory requirements (e.g. Salt Lake County Division of Behavioral Health Services Contract for Mental Health Services, State of Utah Medicaid Manuals)
- Orientation to job-specific functions and applicable policies and procedures
- Level of Care Guidelines
- Fraud, Waste and Abuse

The orientation program components include:

- Mandatory All-Staff Training
- Unit-Specific Training

Ongoing training includes:

- Mandatory All-Staff Responsiveness Updates addressing topics such as changes in policies and procedures and regulatory requirements
- Clinical Responsiveness Updates for clinical staff addressing topics such as psychopharmacology, new technologies in the mental health industry and clinical topics that are identified as necessary to keep staff members current in mental health care.

I. Stakeholder Communications

Optum SLCo will engage in a variety of communication methods to gather input from stakeholders and to communicate program information and changes. These include:

1. Speak Outs and other Public Forums
2. Telephonic Contact
3. Stakeholder Participation in Committees including:
 - a. QAPI Committee
 - b. Provider Advisory Committee
 - c. Consumer Advisory Committee
 - d. Cultural Responsiveness Committee
4. Outreach by Peer Specialists in Optum SLCo's Recovery & Resiliency Unit
5. Written program information
6. Participation in Community-Wide Health Fairs and other public events designed to offer information about resources in the community
7. Network Services communications
8. Provider Trainings

9. Optum SLCo Website
10. Working Relationships with Allied Delivery Systems including, but not limited to:
 - a. Courts and criminal justice
 - b. K-12 schools
 - c. Housing services
 - d. Employment services
 - e. County law enforcement
 - f. Salt Lake County Chemical Dependency Program
 - g. Health plans serving Salt Lake County consumers
 - h. Division of Child and Family Services
11. Consumer Satisfaction Surveys

J. Consumer Safety

Optum is not a direct provider of care and, therefore, has a special role in improving consumer safety that involves fostering a supportive environment to help providers improve the safety of their practices. Exhibit D provides details on how Optum SLCo addresses consumer safety improvement. Optum SLCo tracks, trends, and analyzes adverse clinical safety occurrences, such as critical incidents and clinical quality of care complaints and fraud and abuse related to both inpatient facilities and network providers.

In addition to analyzing the data generated from tracking and trending consumer safety issues, comprehensive policies and procedures address the management of critical incidents and clinical quality of care complaints to reduce clinical risk. For critical incidents, also known as sentinel events, a formal review occurs. A clinical quality of care complaint is a complaint or concern that arises subsequent to assessment, treatment, and/or referral services being rendered to a consumer by a provider.

K. Technology Assessment

The goal of this program is to promote care that incorporates new and proven treatment methodologies, therapies or pharmacological interventions so that Optum SLCo consumers can benefit from advances in treatment protocols. Optum SLCo shares the results of the technology assessment activities with contracted providers, and makes recommendations regarding coverage decisions for treatments and applications which have the potential to improve the consumer's ability to function, the consumer's quality of life, or other mental health outcomes. The assessment process is based on extensive reviews of scientific evidence in clinical literature, determinations from government and other regulatory bodies, and input from specialists and professionals who have expertise in the technology being addressed.

L. Coordination of Care

To facilitate the provision of seamless, continuous and appropriate care, Optum SLCo strives to coordinate a consumer's care throughout the continuum of mental health services, as well as with medical care. Towards this end, Optum SLCo implements policies and procedures which address following up with providers as well as consumers for appropriate information sharing in an effective, confidential and timely manner across all levels of care. Optum SLCo also ensures that consumers receive timely access to and follow-up with appropriate mental health clinicians.

When consumers are receiving inpatient behavioral health services, Optum SLCo monitors continuity and coordination of mental health services with general medical care by collaborating with relevant medical delivery systems and physicians to:

- Exchange necessary information
- Obtain appropriate diagnosis, treatment and referral of mental health disorders commonly seen in primary care
- Use of psychopharmacological medication
- Achieve timely access for appropriate treatment and follow-up for individuals with coexisting medical and behavioral disorders
- Implement and/or support preventive mental health programs in collaboration with contracted health plans and other customers.

When consumers are receiving outpatient behavioral health services, Optum monitors continuity and coordination of mental health services between the Optum Salt Lake County provider with primary care physicians, prescribers and specialists through clinical chart reviews for appropriate releases of information and supporting documentation in the medical record.

As Optum SLCo identifies and prioritizes opportunities for improvement, the organization revises, develops, and implements processes to improve continuity and coordination of care and collaboration of healthcare delivery systems. In revising, developing and implementing processes, Optum SLCo elicits participation and input from contracted medical delivery systems, mental health providers, pharmacy benefits managers and other healthcare providers. Optum SLCo achieves this through integration of its QAPI program with contracted health plans and other clients and by soliciting input from healthcare providers and consumers in the QAPI process. Optum SLCo ensures consumer input into all aspects of its QAPI program through the use of consumers' voices at all levels of the program, and especially through the Consumer Advisory Committee.

M. Cultural Considerations

Optum SLCo has developed a Cultural Responsiveness Plan to document the methods we use to promote culturally competent and culturally responsive care and to track our level of success in achieving goals related to Cultural Responsiveness (SLC Contract, Attachment B, 10.2.4.B). The goals of the Cultural Responsiveness Plan include:

Goal I: Identify policies and procedures that ensure cultural responsiveness is integrated and reflected throughout Optum SLCo and the provider network.

Goal II: Ensure Optum SLCo actively recruits, retains and promotes a diverse staff at all levels of the organization.

Goal III: Ensure network providers across all disciplines have ongoing education, training and clinical consultation in culturally and linguistically appropriate service delivery and dispute resolution.

Goal IV: Ensure Optum SLCo staff across all disciplines have ongoing education, training and clinical consultation in culturally and linguistically appropriate service delivery and dispute resolution.

Goal V: Implement quality improvement activities to monitor cultural responsiveness within the provider network, customer satisfaction, and identify service gaps in the system.

Goal VI: Identify diversity and inclusion best practices and promote these strategies and supports throughout Optum SLCo and the provider network.

Goal VII: Provide language assistance services that are relevant to the needs of all people in Salt Lake County including those who (a) speak a language other than English, (b) are deaf or having hearing impairments, (c) are blind or have visual impairments, and/or (d) have limited reading ability.

The methods used to achieve the goals of the Cultural Responsiveness Plan shall serve as the *Methods of Administration Plan*, a means of assuring that programs of Optum SLCo, activities, services and benefits are equally available to all persons without regard to race, color, national origin, disability, sexual orientation or age. (SLC Contract, Attachment B, 3.3.4) The Cultural Responsiveness Committee directs all activities taken to achieve the Cultural Responsiveness goals, under the oversight of the QAPI Committee.

N. Grievances and Appeals

As defined in Policies *Consumer Grievances*, *Consumer Appeals* and *State Fair Hearing Process*, Optum SLCo and its contracted providers afford consumers access to a grievance process that promotes resolution of grievances at the lowest possible level, protects consumer rights, promotes quality improvement in the delivery of publicly funded community mental health services. Salt Lake County retains the responsibility of managing Consumer Appeals, for purposes of investigation and resolution. Aggregated data from grievances and appeals, including any evidence of trends, may be reported quarterly to the QAPI Committee for further action as needed.

O. External Audits

The QAPI department, under the oversight of the Executive Director, is responsible for coordinating efforts to prepare for external audits such as the External Quality Review (EQR) and audits by collaborative agencies. The Clinical Quality Manager pulls in other Optum SLCo staff as necessary to prepare for external audits and to participate in the on-site audit process. This process is further defined in Policy *QA05: External Audit Preparation and Corrective Action*.

V. PROGRAM STRUCTURE AND RESOURCES

A. Governing Body

As required in the Salt Lake County Contract for Mental Health Services (SLCO Contract, Attachment D, 1.1.1), oversight of the QAPI program is provided through a committee structure that is accountable to United Behavioral Health (UBH) Executive Leadership. The UBH Board of Directors fully delegates responsibility for oversight of the QAPI program to the UBH Executive Leadership, who provides the Board of Directors with an annual report on the QI Program at its annual meeting. The UBH Executive Leadership fully delegates oversight of the QI Program to the national Clinical Policy and Operations Committee (CP&O). The CP&O has delegated to the Optum SLCo Executive Director all of the operational and management responsibilities for implementation of the QAPI program. The Executive Director in turn has delegated full authority for the day-to-day operations and implementation of the QAPI program to the QAPI Committee, co-chaired by the QAPI Manager and the Medical Director.

The Optum leadership team and QAPI Committee have the responsibility for planning, designing, implementing and coordinating consumer care and service and selecting QAPI activities undertaken to meet the needs of consumers.

B. Medical Oversight

Physician oversight, direction, and involvement play an essential role in the QAPI process, and ensure that clinical activities are planned and developed within that framework. The Optum SLCo Medical Director is the designated senior mental healthcare practitioner advising aspects of the QAPI program related to clinical care and safety, is accountable for providing leadership for, and is actively involved in the implementation of the QAPI program. Performance accountabilities for the Medical Director include, but are not limited to, the following:

- Ensure that all quality management initiatives pertaining to the delivery and management of care are clinically sound, promote consumer safety, and are based on best current practices;

- Co-chair the QAPI and UM Committees;
- Participate in and provide support to other committees for the development of appropriate assessment and evaluation efforts, intervention strategies, and corrective action plans;
- Involve mental health providers, and representatives of medical delivery systems in reviewing and planning the QAPI program's core activities.
- Participate in the QAPI Work Plan Evaluation of the QAPI program.

C. QAPI program

The QAPI program covers all QAPI processes for Optum SLCo. Participation and input from Optum SLCo staff, network providers, consumers, families, advocates and allied professionals contribute to the QAPI program. The Optum SLCo Medical Director and Executive Director have substantial involvement in the QAPI program along with other staff within Salt Lake County. The Provider Advisory Committee and the Consumer Advisory Committee provide a focused time for the sharing of ideas, problem solving, and consensus building. The committees additionally work on finalizing projects scheduled for presentation at the QAPI Committee meeting.

D. Quality Committees

The following committees support the QAPI program and form the QAPI Committee Structure.

Local Salt Lake County Committees

QAPI Committee

- A. Role/Purpose: The QAPI Committee's purpose is to outline a strategic and systematic approach toward monitoring and improving the quality of care for consumers residing in the Salt Lake County service area and served through the Optum funded mental health system. Optum SLCo's QAPI program structure serves an integrating function, planning effective and efficient services, monitoring quality assurance, and implementing quality improvement activities to achieve improved outcomes as a result of mental health care and services for consumers in the Salt Lake County service area. The QAPI Committee is responsible for the implementation of the QAPI Work Plan with the mission to improve the mental health and well-being of the consumers and thereby ensuring high quality mental health care services which focus on recovery for adults and resiliency for youth and families, they can achieve their personal goals and live, work, and participate in their community.
- B. Structure/Relation to Organization: The Optum Governing Body is ultimately responsible for overseeing the QAPI Committee. The Executive Director has direct oversight responsibility for all functions of the QAPI Committee and reports directly to the Governing Board. The QAPI Committee is ultimately responsible for assuring compliance with federal and state requirements, continuous improvement in quality of care, and utilization of resources as specified in the contractual relationship with Salt Lake County. The following Committees report to the QAPI Committee:
 - 1. Provider Advisory Committee
 - 2. Consumer Advisory Committee
 - 3. Utilization Management Committee
 - 4. Cultural Responsiveness Committee
- C. Chair: The Clinical Quality Manager and Medical Director co-chair the QAPI Committee.

- D. Authority: The QAPI Committee reports to the Executive Director of Optum SLCo and has full authority to implement all actions related to the QAPI program.
- E. Endorsement: The QAPI Committee has the ability to voice support or a lack of support for proposed action by Optum SLCo, however it should be noted that decisions for action are made by the Executive Director.
- F. Function/Key Responsibilities: The QAPI Committee is responsible for directing the activities of Optum's QAPI program in Salt Lake County. It is actively involved in reviewing, analyzing and enhancing the QAPI program, implementing needed actions, and ensuring follow-up to those actions.

The committee acquires active participation and input from consumers and families, providers and other key stakeholders. All network providers are expected to actively participate in the QAPI process by contributing input through committee meetings, responding to surveys, attending provider forum meetings, cooperating with site audits, participating in performance improvement projects, and applying QAPI concepts to their own policies, procedures and practices.

G. Key responsibilities include:

- i) Creation of annual QAPI Plan, QAPI Work Plan and QAPI Work Plan Evaluation
- ii) Oversight of Performance Improvement Projects
- iii) Review QAPI studies on a regular basis
- iv) Assign staff to specific QAPI initiatives and track progress on action plans, review the results, and evaluate the effectiveness of action plans
- v) Disseminate findings of quality improvement activities as appropriate to Optum SLCo, Salt lake County DBHS staff, consumers and families, providers, and other stakeholders
- vi) Conduct thorough systematic data collection of identified measures and indicators
- vii) Establish performance goals for trended indicators
- viii) Review and compare quarterly indicators and performance data and recommend actions to improve outcomes
- ix) Provide required QAPI reports to external stakeholders
- x) Assure confidentiality of all QAPI process related information when that information relates to peer review, individual performance, or professional conduct
- xi) Assist with developing clinical data warehouse queries related to practice guideline measurements and other clinical metrics
- xii) Maintenance of QAPI Committee structure, including review of subcommittee activities
- xiii) Dedicate time during each meeting for public input from any person who is attending the meeting.

H. Legal Responsibilities: QAPI participants sign a copy of Optum's Confidentiality, Conflict Of Interest & Compliance Agreement on an annual basis.

- i) Confidentiality: An individual's annual signature on the above agreement form acknowledges concurrence for abiding by the Optum's Confidentiality Policy; understanding that noncompliance may be grounds for volunteer (provider staff or community member) dismissal and possible legal actions for violations of applicable regulations and rules; and

their agreement to report all violations or suspected violations to the Optum's Deputy Director who also serves as the Compliance Officer.

- I. Frequency of Meetings: Meetings occur at least quarterly.
- J. Membership:
 - i) Optum QAPI Manager (Co-Chair) or designee
 - ii) Optum Medical Director (Co-Chair)
 - iii) Optum Executive Director
 - iv) Representatives from consumer and family organizations such as NAMI Utah and Allies with Families
 - v) Consumer(s)
 - vi) Family member(s)
 - vii) Optum Clinical Director
 - viii) Optum Recovery & Resiliency Manager
 - ix) Optum Network Services Director
 - x) Other Optum staff as needed
 - xi) Salt Lake County DBHS representative(s) (SLC Contract, Section A, 9.A.4)

Provider Advisory Committee

- A. Role/Purpose: The Provider Advisory Committee allows for network provider input into Optum's utilization management/care management and QAPI programs.
- B. Structure/Relation to Organization: The Provider Advisory Committee reports to the QAPI Committee.
- C. Chair: The meetings are co-chaired by the Clinical Director and the Network Services Director.
- D. Function/Key Responsibilities:
 - i) Reviews and provides input into the QAPI program
 - ii) Reviews and provides input on service or clinical quality monitors
 - iii) Provides input into utilization management/care management processes, documents and decision-making tools
 - iv) Encourages and promotes improved communication between the provider network and Optum SLCo
 - v) Provides a mechanism whereby providers can contribute feedback about various aspects of Optum
 - vi) Shares information between network providers and Optum SLCo relative to trends in the managed care industry
 - vii) Reviews and provides input into the Provider Satisfaction Survey results and action plans
- E. Frequency of Meetings: Quarterly or more frequently when needed
- F. Membership:
 - i) Optum Clinical Director (co-chair)

- ii) Optum Network Services Director (co-chair)
- iii) Network Physicians, Psychologists and masters level providers
- iv) Facility Representative(s)
- v) Optum Clinical Quality Manager
- vi) Optum Care Advocate(s)
- vii) Optum IT Reporting staff
- viii) Salt Lake County DBHS representative(s)
- ix) Consumer(s)
- x) Family member(s)

Consumer Advisory Committee

- A. Role/Purpose: The Consumer Advisory Committee is responsible for providing oversight and addressing issues related to customer service, consumer concerns, access, provider availability, complaints, grievances, satisfaction surveys, and confidentiality. The Committee also reviews and provides input into applicable consumer information and educational material. The Committee also reviews and provides feedback on Level of Care Guidelines and provides feedback and input into QAPI and utilization management/care management activities.
- B. Structure/Relation to Organization: The Consumer Advisory Committee reports to the QAPI Committee.
- C. Chair: Recovery & Resiliency Manager and Provider Liaison
- D. Function/Key Responsibilities:
 - i) Reviews and provides input into applicable consumer information and educational materials;
 - ii) Provides feedback and input in at least the following areas:
 - 1. Performance Improvement Projects
 - 2. Consumer and Family Satisfaction Surveys
 - 3. Level of Care Guidelines
 - 4. Preferred Practice Guidelines
 - 5. Preventive Health efforts
- E. Frequency of Meetings: Meetings occur quarterly or more often when needed
- F. Membership:
 - i) Optum Recovery and Resiliency Manager (co-chair)
 - ii) Consumer organization representative(s)
 - iii) Family organization representative
 - iv) NAMI Representative
 - v) Representative of Peer Specialists
 - vi) Optum Clinical Quality Manager or designee
 - vii) Optum Clinical Director

- viii) Optum Complaints/Grievance Specialist
- ix) Optum IT Reporting staff
- x) Representative from Optum Network Services
- xi) Representative(s) from Network providers
- xii) Salt Lake County DBHS representative(s)

Cultural Responsiveness Committee

- A. Role/Purpose: The Cultural Responsiveness Committee reviews and recommends standards of practice and outcomes related to cultural competence, and reviews access to service data, monitoring data, and complaint and grievance data to identify trends and make recommendation for quality improvement initiatives as they relate to culturally competent services.
- B. Structure relation to the Organization: The Cultural Responsiveness Committee reports to the QAPI Committee.
- C. Chair: Optum Clinical Quality Manager or designee and Salt Lake County Division of Behavioral Health Representative, as defined by Salt Lake County
- D. Functions/Key Responsibilities:
 - i) Ensure that staffing at all levels is representative of the community
 - ii) Ensure cultural factors are integrated into the clinical assessment
 - iii) Ensure that treatment plans and interventions are culturally appropriate
 - iv) Sponsor Cultural Responsiveness Trainings as needed
- E. Frequency of Meetings – Quarterly or more frequently when needed
- F. Membership:
 - i) Optum Clinical Quality Manager (co-chair) or designee
 - ii) Salt Lake County Division of Behavioral Health Representative (co-chair)
 - iii) Representatives from consumer organization(s)
 - iv) Representative from a family organization(s)
 - v) Representatives from providers that serve specialty populations
 - vi) Representative(s) from Network providers
 - vii) Providers from allied service systems
 - viii) Optum Clinical Director or designee
 - ix) Optum IT Reporting staff
 - x) Optum Recovery & Resiliency Manager
 - xi) Representative from Optum Network Services
 - xii) Representatives from community based ethnic and minority organizations
 - xiii) Salt Lake County DBHS representative(s)

Utilization Management Committee

- A. Role/Purpose: The Utilization Management Committee functions as a workgroup designed to assure that utilization of mental health services and resources are consistent with the service needs of consumers, within evidence based practice standards and provided in an effective, cost efficient manner.
- B. Structure/Relationship to Organization: The Utilization Management Committee reports to the QAPI Committee.
- C. Chair: The Medical Director and the Clinical Director co-chair.
- D. Function/Key Responsibilities:
 - i) Reviews, communicates and implements policies and procedures for utilization management to continually monitor and evaluate the adequacy and appropriateness of the delivery of mental health services.
 - ii) Reviews timeliness of medical necessity determinations for treatment, continued stays, and services rendered.
 - iii) Monitors over/under utilization, identifying outliers, and evaluating trends of service delivery for quality and outcome improvement opportunities.
 - iv) Reviews utilization and monitors triggers – Crisis bed utilization, crisis services over utilization, inpatient readmission rates, intensive service authorizations, residential utilization, service over/under utilization, consumers with co-occurring disorders identified at intake, prescriber utilization.
- E. Frequency of Meetings – Monthly
- F. Membership – Membership will include the following Optum SLCo staff:
 - i) Medical Director (co-chair)
 - ii) Clinical Director (co-chair)
 - iii) Clinical Quality Manager
 - iv) Network Services Director
 - v) IT Reporting staff
 - vi) Care Advocate staff as needed
 - vii) Finance staff as needed
 - viii) Peer Specialist(s)
 - ix) Salt Lake County DBHS representative(s)

Peer Review Committee

The Optum Sentinel Event Policy and Procedure was reviewed, and the decision was made to utilize the Optum Sentinel Event Committee (SEC) to review sentinel events when quality of care concerns contributed to the event. In addition, the Optum Quality of Care Concern policy and procedures were reviewed, and the decision was made to refer incidents with a high severity rating, using the scale in the policy, to the National Peer Review Committee (NPRC). Therefore, the Peer Review Committee was not reinstated and will no longer be a part of the Optum SLCo QAPI Program.

Corporate Committees:

The following Optum corporate committees are available to provide support to the local Salt Lake County operation:

Sentinel Event Committee (SEC)

The Sentinel Event Committee is a national committee chaired by two Optum medical directors and composed of Optum behavioral health personnel licensed in a variety of disciplines from across the country. This body meets monthly to review quality of care concerns which have been identified as contributing to sentinel events. The committee may recommend and/or take action if it finds there are concerns about quality of care. These steps are reviewed with Optum SLCo leadership, as the Optum corporate and local teams work collaboratively with the practitioner/facility to improve patient safety.

National Peer Review Committee (NPRC)

The National Peer Review Committee is a national committee chaired by an Optum medical director and is also composed of Optum behavioral health personnel licensed in a variety of disciplines from across the country. The group meets monthly to review quality of care concerns, unrelated to sentinel events, which meet the highest ratings on the severity scale, which is included in the policy. This committee makes recommendations for action. In cases where quality of care concerns exist which are both related and unrelated to a sentinel event, the SEC is designated to review.

Clinical Policy and Operations (CP&O) Committee

The purpose of the CP&O Committee is to oversee all care advocacy, EAP and provider network-related policies and procedures as well as other core documents, standard clinical programs and accreditation-related activities within UBH. The scope of the committee's purpose extends across all lines of business.

The committee promotes operational processes that meet internal, regulatory and industry standards by providing a framework for the review, approval and communication of policies and procedures as well as other core documents, clinical programs and accreditation-related activities. The committee further promotes the integrity and quality of operational processes by monitoring relevant outcomes, and serving as a forum for communicating business changes and other significant organizational changes that impact operational processes.

The Chief Medical Officer of Behavioral Solutions, Vice President of Care Advocacy and Sr. Vice President of Care Advocacy Center Operations co-chair the committee.

Quality Improvement Council (QIC)

The QIC serves as the enterprise-wide oversight body that reviews, monitors, evaluates, and directs improvement of the quality and safety of service and clinical activities performed by Optum Behavioral Solutions (OHBS). The committee has accountability for all OHBS business. The council has accountability for the QI programs of all OHBS entities, including UBH. In that capacity, the QIC reviews, monitors, and makes recommendations for enterprise-wide standard QI activities, oversees service and clinical performance measures, analyzes clinical risk management strategies and initiatives, oversees accreditation activities and oversees QI activities in key departments, including Network Services, Claims, Claims Customer Service and Intake. The OHBS Vice President of QI chairs the QIC.

Credentialing Committee

The Credentialing Committee is responsible for approving credentialing and recredentialing decisions for Optum practitioners and for assessing facilities. The Credentialing Committee meets at least monthly, but more frequently if necessary. The committee is comprised of a range of behavioral health practitioners. The Credentialing Committee reviews the credentials of practitioners, and in accordance with Optum's

credentialing and recredentialing criteria approves practitioners for participation in the Optum clinical network.

E. Minutes

QAPI Committee meeting minutes are created within a reasonable time frame and signed and dated in the next subsequent meeting when revisions are made and minutes approved. Copies of the minutes are maintained on site and subject to review by Salt Lake County.

F. QAPI Resources

Resources include all staff at Optum SLCo.

Personnel Resources (Exhibit C)

1. Information System Resources

Data Source	Description
Optum Management Information System - MyAvatar	Management Information System of which Salt Lake County operates

VI. ANNUAL QAPI WORK PLAN

The Annual QAPI Work Plan is developed from the previous year’s work plan and re-evaluated against categories of high-volume diagnoses and identified trends or areas of concern. The work plan includes the following related to proposed QAPI activities:

- Time frames which each activity is to be achieved
- Persons responsible for each activity
- Planned monitoring of previously identified issues
- Planned evaluation of the QAPI Work Plan.

The work plan is a dynamic document updated as needed to reflect changes in processes, priorities and activities. The work plan is used to:

- Ensure performance targets continue to be met
- Identify opportunities for improvement
- Develop action plans based on root cause analysis for targets not met
- Ensure implementation of appropriate actions in a timely fashion
- Monitor effectiveness of interventions implemented
- Develop additional targets and or activities when indicated.

The QAPI Committee approves the work plan. QAPI Committee participants and persons responsible for work plan activities communicate to Optum SLCo staff on work plan activity performance.

VII. QAPI WORK PLAN EVALUATION

The QAPI Work Plan Evaluation is conducted annually and is presented to the QAPI Committee for endorsement.

The evaluation analyzes the effectiveness of the organization’s:

- Activities to continuously improve the quality of care and service delivered to consumers
- Processes for consumer access to needed care
- Actions to improve consumer and clinician satisfaction.

The QAPI Work Plan Evaluation considers relevant input from the QAPI Committee structure, providers, consumers, families and other stakeholders.

The QAPI Work Plan Evaluation includes:

- A description of completed and ongoing QAPI activities that address the quality and safety of clinical care and the quality of service
- Trending of measures to assess performance in the quality and safety of clinical care and the quality of service
- An analysis of whether there have been demonstrated improvements in the quality and safety of clinical care and the quality of service to consumers
- An evaluation of the overall effectiveness of the QAPI program, including progress toward influencing safe clinical practices throughout the network.

The evaluation of the overall effectiveness of the QAPI program gives careful consideration to all aspects of the program. Optum SLCo addresses issues such as the adequacy of the resources devoted to the program, committee structure, provider participation and leadership involvement. The evaluation provides recommendations to consider when determining whether to restructure or change the QAPI program for the subsequent year.

VIII. CONFIDENTIALITY

Optum confidentiality policies and procedures provide for the security and appropriate use of consumer information designated as protected health information (PHI) by state and federal regulations. These policies govern the use of PHI in QAPI program activities, preventing its inadvertent, purposeful, and improper disclosure, loss, altering, tampering, destruction or misuse. Optum employees and business associates (e.g. contractors, providers) with access to PHI receive orientation and agree to adhere to privacy and confidentiality policies and procedures. For Optum employees, any breach in confidentiality may result in disciplinary action and for business associates, may result in contract termination.

EXHIBIT A: HEALTHCARE INTEGRATION AND COLLABORATION

Optum recognizes that stakeholders demand that managed care organizations, medical systems, and mental health delivery systems seek ways to provide affordable, effective care considerate of the needs of the individual consumer (Vaccaro and Beaudin, 2001). Health care should continually reduce the burden of illness, injury and disability and improve health and functioning (Advisory Commission on Consumer Protection and Quality in the Health Care Industry, 1998). Responding to these demands, Optum is committed to collaboration with providers and consumers, and the healthcare organizations that support care delivery, to develop and implement processes that support the six aims for improvement identified by the Committee on Quality of Health Care in America (Institute of Medicine, 2001). Health care should be:

- *Safe* – avoiding injury to consumers caused by clinical mistakes
- *Effective* – evidence-based, avoiding treatments not likely to benefit consumers
- *Consumer-centered* – providing care that respects and responds to individual consumer preferences, needs, and values
- *Timely* – reducing waits and harmful delays in care
- *Efficient* – avoiding waste of resources utilized in care delivery
- *Equitable* – eliminating variations in quality that arise from personal characteristics, such as age, gender, ethnicity, geographic location, and socioeconomic status

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Vaccaro, J and Beaudin, CL. (2001). *Integrating Mental health and Primary Care: Finding New Solutions to Longstanding Problems in Managed Mental health Care Handbook*, Clarke E. Ross (Editor), Aspen Publications: Gaithersburg, MD.

EXHIBIT B: QAPI COMMITTEE STRUCTURE

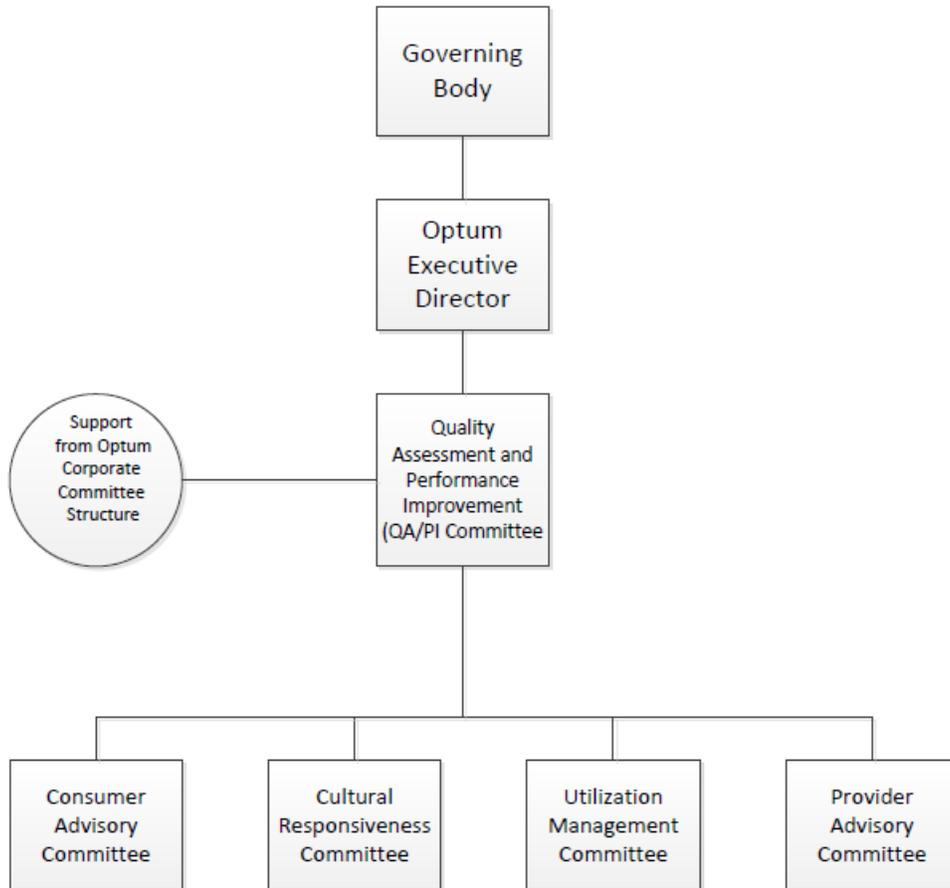
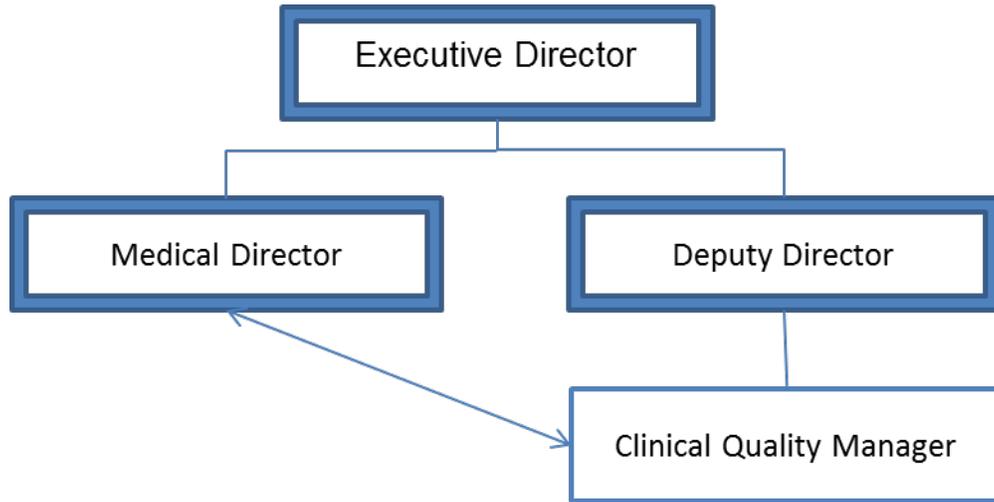


Exhibit C: QAPI Resources

QAPI UNIT ORGANIZATION CHART



OPTUM SLC_o QAPI RESOURCES

Position	<i>Responsibilities</i>	Full Time Employees	Time Committed to QAPI Functions ¹
Executive Director	Oversight of the Salt Lake County administrative and clinical operations, including QAPI, care coordination and utilization management. Allocation of resources to QAPI activities.	1	25%
Medical Director	Co-chairs Regional QAPI and UM Committees Sentinel Event ad hoc reviews Quality of Care (QOC) reviews Oversight of QAPI activities and the development of the Annual QAPI Work Plan Utilization management decision-making (e.g. adverse determinations) Clinical oversight of the care advocacy and the utilization management program	1	100%

¹ QAPI functions include all activities performed to ensure delivery of quality care and service to Optum Salt Lake County consumers.

OPTUM SLCo QAPI RESOURCES

Position	<i>Responsibilities</i>	Full Time Employees	Time Committed to QAPI Functions ¹
Clinical Quality Manager	Co-chairs the QAPI Committee Sentinel Event ad hoc reviews Leading and coordinating clinical QAPI activities Annual QAPI program Description and Work Plan Analysis and reporting on continuous monitors of clinical quality Employee and provider training relative to QAPI functions.	1	100%
Compliance Manager	Will be responsible for conducting required studies, supporting evaluation of provider performance, identification of high need and high risk consumers, and supporting QM committee structure. Routine analysis and reporting on continuous monitors of clinical quality. Employee training relative to QAPI functions. Participating in QAPI initiatives, including action plan development and committee/work group participation. Developing and monitoring compliance in accordance with contract requirements, provider compliance, Fraud, Waste, and Abuse, and Optum corporate policies.	1	50%
Clinical Appeals Manager	Will coordinate total complaints/grievances/appeals process, ensuring compliance with all applicable regulations; also responsible for monitoring and tracking Optum SLCo's response to verified critical incidents. Reviewing and tracking of Quality of Care complaints.	1	100%
Senior Care Advocate assigned to QAPI Team	Co-chairs the Cultural Responsiveness Committee Sentinel Event ad hoc reviews Annual QAPI Evaluation Provider audits, training and other communications Assists Clinical Quality Manager as needed	1	100%
Clinical Director	Clinical supervision and consultation with care management staff Daily oversight of clinical operations including direct oversight of Care Advocates. On-call for care coordination on crucial after hours issues	1	25%
IT Reporting Manager	Oversight of IT systems. Oversight of submission of required reports. Provide training to Optum SLCo staff and to provider staff as required Generate and ensure accuracy of required and ad hoc reports	1	25%
Reporting Specialist	Responsible for oversight of reporting processes and reports	1	25%
Encounter Data Specialist	Process data and submit on required schedule. Submit corrected data as necessary.	1	25%

OPTUM SLCo QAPI RESOURCES

Position	<i>Responsibilities</i>	Full Time Employees	Time Committed to QAPI Functions ¹
Network Management Director	Responsible for provider contracting and contract compliance as well as for building effective working relationships with allied delivery systems. Responsible for training and monitoring compliance with all network access standards. Negotiates contracts	1	50%
Network Services Liaison	Will be assigned to network providers to provide administrative support to ensure contract compliance	1	50%
Finance Manager	Will be responsible for compliance with administrative budget, tracking medical budget, and ensuring accuracy of financial reports	1	50%
Accountant	Will be responsible for tracking, accurately reporting and categorizing all expenditure and also for monitoring provider compliance with budgetary and financial requirements	1	50%
Care Advocates	Care Advocates with particular areas of clinical expertise will be hired, including at least one with experience and training in working with children. Care Advocates will review requests for service authorizations and also will provide care coordination. Care Advocates will spend up to 20% of their time attending treatment team meetings and reviewing clinical records, especially of high need and high risk consumers.	6	25%
Recovery and Resiliency Manager	Responsible for adding perspective of consumers and family members to all facets of operations; Outreach to consumers and families, including all written materials; provide training on principles of recovery and resiliency to consumers, families, providers and Optum SLCo staff, recruit participants for QAPI committees with consumer participation; coordinate with County initiatives related to recovery, resiliency, and the use of Certified Peer Specialists	1	25%
Peer Specialist	Responsible for supporting adult consumers and the development of a recovery-centered culture within the delivery system; Responsible for interfacing with consumer-run organizations and with Peer Specialists working for network providers; Ensures expansion of peer support services and availability of Peer Counselors to all those in transition.	1	25%
Family Peer Specialist	Responsible for working with family organizations to ensure the availability of family partners and youth partners to members who choose those services; also for encouraging family participation in delivery system	1	25%
Receptionist/ Admin Assistant	May serve as initial point of contact for callers and visitors; provide administrative support for all staff	1	10%

EXHIBIT D. CONSUMER/PATIENT SAFETY PLAN

Introduction

Effective strategies for proactively reducing errors and ensuring patient safety require an integrated and coordinated approach to synthesize knowledge and experience for management of actual and potential risks. Healthcare organizations can encourage learning about what constitutes an error, promote internal reporting of findings, actions taken to reduce risk, and focus on process and system improvement that minimizes individual blame. Even though research is scarce, there is information available to inform the development of initiatives targeting the reduction of errors, regardless of treatment setting. It is reported that 45,000-98,000 Americans die each year due to medical errors. The costs of such errors are huge; medication errors alone during inpatient medical hospitalizations have been estimated to cost as much as \$2 billion per year within the United States. There are also costs, which are not directly measurable, such as consumer dissatisfaction and loss of trust from consumers and providers. Cumulatively, these costs are tremendous, causing insurance and consumer co-payment costs to skyrocket.

Optum is not a direct provider of care, and therefore has a special role in improving patient safety that involves fostering a supportive environment to help practitioners and providers improve the safety of their practices. UBH personnel are responsible for identifying, reporting and documenting risk management and potential quality of care problems that impact the clinical safety of the patient. Effective strategies for proactively reducing errors and ensuring patient safety require an integrated and coordinated approach to synthesize knowledge and experience for the management of actual and potential risks. Activities encourage learning about errors and encourage internal reporting of what has been found, actions taken to reduce risk, and a focus on process and system improvement that minimizes individual blame. Patient safety issues are monitored at a regional and corporate level to ensure:

- Complaints or concerns about quality or appropriateness of services are investigated and that appropriate corrective actions or interventions are implemented.
- Patient safety activities are established.
- Operations are compliant with local, state and federal regulatory practices.

Monitoring and Improvement Activities

QAPI practices can qualify as patient safety activities including those that focus on improving performance to an adequate threshold and a safe level of accuracy. Optum SLCo monitors areas of potential clinical risk for consumers, assures the safety of consumers, and takes action when necessary to alter conditions that produce poor quality. This might include the altering of processes and structures associated with the delivery of mental health, substance abuse and employee assistance program services. Optum SLCo focuses on activities having a high probability of impact that capture adverse outcomes, procedural breakdowns and sentinel events. Data gathering from these activities inform corporate and regional quality improvement to reduce the potential for harm.

Preferred Practice Guidelines

Optum adopts diagnosis-specific practice guidelines for acute and chronic care that are relevant to the local population. Optum adopts nationally recognized guidelines developed by experts and approved by professional organizations. Preferred Practice Guidelines are developed by the Division of Substance Abuse and Mental Health (DSAMH) and recognized by PMHP contractors (SLC Contract, Attachment E, 12.5). DSAMH guidelines are supplemented by guidelines adopted from external, nationally recognized organizations such as the American Psychiatric Association and the Academy of Adult and Adolescent Psychiatry. These guidelines are based on reasonable scientific knowledge and best practices for the

treatment of mental health disorders. Optum selects, reviews and updates guidelines by researching current standards of care and soliciting input from actively practicing clinicians. Adopted guidelines are reviewed annually and updated as needed to reflect current standards and scientific knowledge. Adopted guidelines are made available to clinicians and consumers upon request.

Collaboration on Continuity and Coordination of Care

Poor information transfer and faulty communication can compromise patient safety. Optum SLCo collaborates with mental health and medical delivery systems to promote continuity, and coordination of care across the healthcare continuum.

Activities to promote coordination and continuity of care between mental health and medical care may include:

- improving exchange of information
- collaboration when either the primary care provider (PCP) or another clinician is prescribing psychotropic medication
- collaboration when the patient has a coexisting medical diagnosis
- collaborative implementation of preventive health program(s).

Activities to promote continuity and coordination of care throughout the continuum of mental health services may include:

- improving exchange of information
- improving access and follow-up to appropriate mental health clinicians in the network

Quality of Care

Optum SLCo immediately reviews quality of care complaints and grievances to ensure that the quality of care delivered to consumers is in accordance with professionally recognized standards of practice. In addition, Optum SLCo takes action on Quality of Care concerns to reduce risk to its consumers. A Quality of Care grievance is defined as an expressed dissatisfaction about any matter other than an action that relates to the quality of clinical treatment services provided by a provider.

After the investigation of a Quality of Care grievance, corrective action(s) or intervention(s) are implemented when appropriate. A Quality of Care grievance may be referred to the National Peer Review Committee (NPRC) consisting of behavioral health clinicians throughout Optum for analysis and further investigation, as necessary. Investigations may include a request for medical records. A clinician or facility about whom a Quality of Care grievance is being investigated may be asked to respond to any identified deficiency.

Sentinel Events Review

A *critical incident* is defined as an unexpected occurrence involving death or serious physical injury, or the risk thereof, which occurs during the course of a consumer receiving mental health treatment. For the purpose of this document, critical incidents are defined as any of the following events, or the risk thereof:

1. Completed suicides on either an outpatient or an inpatient basis.
2. Serious suicide attempts, requiring significant medical intervention, such as an overnight admission to a hospital medical unit, while in facility-based or non-facility-based outpatient treatment.
3. Homicides attributed to Optum SLCo members.
4. Unexpected deaths while in behavioral health treatment

5. Physical or sexual assaults, including alleged assaults, and/or abductions of patients while in treatment at inpatient, partial hospitalization or residential mental health or substance abuse facilities.
6. Serious injuries requiring significant medical intervention, such as an overnight admission to a hospital medical unit, of members while in treatment at inpatient, partial hospitalization or residential mental health or substance abuse treatment facilities.
7. Serious assaults, both physical and sexual, by members that occur while in facility-based treatment.
8. An instance of care (at any level) ordered or provided to a member by someone impersonating a physician, nurse or other health care professional.

The local ad hoc group comprised of Optum SLCo staff and the Salt Lake County DBHS Assistant Director of Clinical Services reviews all reported incidents to determine if criteria for a sentinel event is met. If so and quality of care concerns are identified which could have contributed to the sentinel event, the local medical director may refer the case to the Optum National Sentinel Event Committee, comprised of Optum M.D.s throughout the country. This group makes recommendations for improving patient care and safety, including recommendations that the Optum Corporate Audit Team conduct a site audit and/or a record review of the facility/clinician. The committee may also provide facilities and clinicians with written feedback related to observations made as a result of the review of the sentinel event and request a corrective action plan

Credentialing/Recredentialing

Optum has mechanisms in place for credentialing and recredentialing of behavioral health practitioners with whom it contracts or employs who fall within its scope of authority and action. Optum identifies potential high-volume practitioners and evaluates office site and treatment record keeping practices prior to credentialing. For practitioners, performance monitoring occurs for recredentialing such as monitoring of consumer complaints, quality of care issues, and ongoing monitoring of sanctions and complaints demonstrating periodic review and implementation of appropriate interventions when instances of poor quality are identified.

Informed Consent

Individuals have the right to determine the course of treatment, whether consent is given verbally or in a written document. This ensures that individuals are informed and understand all of the important aspects of their care and treatment. Optum SLCo has established policies to assure that clinicians and providers obtain consent from individuals when treatment is initiated in accord with appropriate state legislation.

Privacy and Confidentiality of Health Information

Information about an consumer's medical care, including mental health treatment and chemical dependency diagnosis and treatment, and other personal information about members, is highly confidential and protected by state and federal law. There are severe penalties for not following prescribed rules with respect to the disclosure of confidential consumer information. Optum SLCo treats its obligations to preserve the confidentiality of patient health information and other personal information seriously and expects all departments and employees to do so also. Optum SLCo protects the confidentiality of all consumer health information in its possession, including mental health treatment and chemical dependency diagnosis and treatment and prevention, and other personal information about consumers. This is in keeping with recognized rights to privacy and in accordance with the applicable accreditation standards for MBHOs.

Consumer and Provider Satisfaction

Patient safety, when considered from the point of view of the managed care organization, includes

physical and mental well-being. Mental well-being encompasses satisfaction with services in that if a consumer is dissatisfied, it means that they may not be receiving the quality of services needed. If a provider is dissatisfied, this may translate into treatment for the service users not meeting the standards and practices promoted by Optum SLCo. Additionally, Optum SLCo has written policies and procedures for thorough, appropriate and timely resolution of grievances and provides consumer information about how to submit a grievance. Decision documentation, prompt resolution and notification of grievance resolution as well as data analysis are critical to promote consumer satisfaction and proactively address potential quality problems.

Internal Training

Optum trains employees in various topics relating to patient safety. These training sessions are intended to enhance already existing skills as well as to develop those needed in newer employees. The Optum training program includes:

- Initial orientation and/or training for all staff before assuming assigned roles and responsibilities
- Ongoing training as needed to maintain professional responsiveness
- Training in state and federal regulatory requirements as related to job functions
- Documentation of all training provided for staff
- Conflict of interest
- Confidentiality
- Organizational structure.

Information Distribution

Optum **SLCo** actively informs its service users, providers, and clinicians of issues pertaining to consumer safety and well-being through our Website. Content includes:

- Consumer Rights and Responsibilities
- Consumer and clinician satisfaction
- Best practice guidelines
- Quality Information
- Confidentiality
- Patient Safety Information

Collection of Data on Actions to Improve Patient Safety

Optum SLCo has a plan to collect data on mental health contractors' actions to improve consumer safety. This written plan, including strategies for its implementation, is reviewed annually by the QAPI Committee and updated as necessary.

Evaluation

As part of its annual QAPI Work Plan Evaluation, Optum SLCo determines the effectiveness of its practices for patient safety activities (e.g., trending of measures to assess performance in the quality and safety of clinical care and the quality of service and evaluation of the overall effectiveness of the QAPI program, including progress toward influencing safe clinical practices throughout the network). The evaluation provides evidence of the effectiveness of practices, determines if opportunities for improvement exist, notes the degree of improvement where the process of care was found to improve, and identifies any policies and procedures that require development. In conducting the evaluation, Optum SLCo strives to:

- Maintain and enhance a framework of assessing the main elements of Optum SLCo patient safety activities.
- Document any barriers and limitations in current practices.
- Communicate the results in an organized and accessible way, making sure the “take home” message is easily understood by Optum SLCo personnel, network providers, and consumers.
- Emphasize changing the system to make treatment safer for consumers by continually focusing on the structure, processes and outcomes of care.

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