TCL QAPI Guidance: Guidelines for Tailored Plan (TP)/Prepaid Inpatient Health Plan (PIHP) Transitions to Community Living (TCL) Quality Assurance and Performance Improvement (QAPI) Plan

Background and Objective of the TCL QAPI Plan

NCDHHS Transitions to Community Living provides eligible adults living with serious mental illness (SMI) the opportunity to choose where they live, work and play in North Carolina. TCL promotes recovery through long-term supportive housing and community-based mental health, supported employment, and community integration services. Over the life of the program, TCL has transitioned more than 3,500 individuals from adult care homes and state psychiatric hospitals to permanent supportive housing and diverted more than 6,000 adults with SMI from entering adult care homes.

The TCL QAPI Plan is part of the TP's/PIHP's contractually required QAPI Plan, to ensure compliance with 42 CFR 438, Subpart E.[1] It describes data-driven processes to monitor and ensure contract compliance, identify and remediate quality issues, and demonstrate performance improvement in support of current and future TCL members. State level oversight of TP/PIHP quality assurance and performance improvement for TCL involves North Carolina's DHHS Division of Mental Health, Developmental Disabilities and Substance Use Services (DMHDDSUS); Division of Health Benefits (DHB); and Office of the Secretary (NC Olmstead).

The TCL QAPI Plan is a living document that evolves as the TCL QAPI system matures. Initial development of TP TCL QAPI Plans and documentation included review of existing QAPI processes, to help evaluate and address three guiding questions:

1. Have QAPI activities been implemented and conducted as planned?
2. Are TCL program goals being achieved?
3. What quality improvement actions are needed and will be taken to address identified compliance, quality, and performance issues?

Documentation of existing QAPI processes serves a dual purpose. For TPs, it is a formative exercise that helps them develop and implement QAPI processes in a structured way that matures their capability and that is unique to their network and catchment area. It also enables DHHS to perform its oversight and monitoring roles, as well as facilitates the identification and prioritization of gaps and opportunities for improvement, and delivery of technical assistance and other kinds of support for TP/PIHP QAPI implementation.

The overarching objective of the QAPI Plan is to ensure the quality and effectiveness of TCL services and supports in order to achieve intended objectives and member outcomes. A fully developed Plan includes processes to monitor, identify, and address quality and performance issues related, at minimum, to TCL Core Program Components shown in Table 1 below.

However, the details of each QAPI process addressing the TCL core program components are at the discretion of each TP/PIHP based on their priorities and local context. TPs/PIHPs likewise may update QAPI processes and goals throughout the year to reflect changing constraints and priorities and need only document such revisions as part of required annual QAPI submissions.

---

[1] Effective in SFY 2026, Transitions to Community Living is integrated into the contractually required TP/PIHP QAPI Plan and documentation, with activity updates submitted on the same annual cycle.

Table 1. TCL Core Program Components

Scope	Description	Core Program Components
Services and Supports	Covers community-based services and supports, including tenancy supports, community-based mental health services, employment services, peer supports, crisis services; assertive engagement services	*Network adequacy and service gaps; service access and provision; person centered planning; crisis planning; service intensity/ frequency/ duration; services are individualized, evidence based, recovery focused and strengthen the individual's integration into community living; provider training and capacity; MH/SUD provider service outcomes assessments*
Program Operations	Operational processes and other contracted functions	*Supportive housing slot provision and requirements, development and improvement of housing opportunities, in-reach, discharge and transition planning, bridge housing utilization, pre-admission screening and diversion, survey administration, RN/OT physical health and functional assessments, informed decision-making, tailored care management, complex care, barriers committee operations and training, staffing levels and expansion, staff training*
Member Outcomes	Outcomes related to objectives of TCL and the State's settlement agreement with U.S. DOJ	*Housing stability, community integration including competitive integrated employment and educational enrollment, quality of life, adverse incidents including incarceration, housing separations that involve a Level 3 incident or TCL member death, ACH admissions and readmissions, hospital admissions and readmissions, ED visits and repeat visits*
Data and Reporting	Data integrity and required reporting	*Accuracy and timeliness of database entries and reporting on community integration services and supports and supportive housing rental subsidies and leases, other required reporting*

TCL QAPI Plan Elements

The QAPI Plan includes the following content:

I. Introductory statement of the purpose and scope of TCL aspects of the QAPI Plan

II. Overview of the existing TCL QAPI system structure, including key staff positions and business units; crucial data sources, tools, and systems used to support and carry out QAPI activities; and the flow of data and information within the system

III. Inventory of TCL QAPI processes currently in place and planned for implementation (Planned processes may be submitted in a separate inventory if preferred.)

The TCL QAPI process inventories document existing and planned processes to address each of the TCL core program components listed in Table 1. The table below illustrates recommended column or row headings to capture basic aspects of each process, but TPs/PIHPs retain the flexibility to submit their inventories in any format so long as the inventories address all of the core program components, and the descriptions of each QAPI process address the content described below.

Scope	Objective	Task/Goal	Frequency	Responsible Person	Task Update
Which of the four broad categories: Services and Supports, Program Operations, Member Outcomes, Data and Reporting	*Describe the purpose of the process and identify the core program component or requirement it addresses.**	*Describe the process and, when applicable, set a goal that is measurable by including measures/ indicators for tracking performance.*	*e.g., quarterly, monthly, etc.*	*Identify the responsible business unit, team, and/or person.*	*Provide updates on QAPI process in place during the reporting period.* *For planned QAPI processes, provide the expected implementation date or timeline.*

*Some processes may address multiple program components, and some program components may be addressed by multiple processes

or

Scope: **Objective:** **Task/Goal:** **Frequency of Reporting:** **Responsible Person:** **Task Update:**

Integration of TCL QAPI Plan into TP/PIHP Quality Management Documents

The elements of the TCL QAPI Plan and TCL QAPI activity reporting are integrated into the existing Quality Management documentation cycle and are part of the TP's/PIHP's contractually required QAPI Plan.

As illustrated below, elements I and II are incorporated into the Quality Management and Improvement Plan (QMIP), and element III is incorporated into the QAPI Work Plan. TCL QAPI activity updates are incorporated into the Annual Quality Management Program Evaluation.

Elements of TCL QAPI Plan	Existing QM Documents
I. TCL QAPI Plan purpose and scope II. Existing TCL QAPI system structure	Quality Management and Improvement Plan (QMIP)
III. Inventory of current and planned TCL QAPI processes	QAPI Work Plan
TCL QAPI annual activity updates	Annual Quality Management Program Evaluation (Submitting as a separate, standalone document is also acceptable.)