

POLICIES AND PROCEDURE MANUAL

Chapter:	Compliance		
Title:	Compliance Line		
Policy: <input checked="" type="checkbox"/> Procedure: <input type="checkbox"/> Page: 1 of 2	Review Cycle: Annually Author: Chief Compliance Officer & Quality Improvement Council	Adopted Date: 07.01.2014 Review Date: 11.05.2019 Revision Eff. Date:	Related Policies: Compliance and Program Integrity

Purpose

To ensure Mid-State Health Network (MSHN) maintains a compliance line that is available to receive reports from employees, network providers, contractors and/or consumers about suspected fraud or regulatory violations.

Policy

The Mid-State Health Network will develop and maintain a dedicated compliance line for the purpose of receiving reports from employees, network providers, contractors, consumers, and/or stakeholders about suspected fraud or regulatory violations.

The telephone number for the compliance line will be posted prominently in all office locations and on the MSHN website. Calls will be treated confidentially and in accordance with the protections provided in the Michigan Whistleblower's Act (PA 469 of 1980).

The MSHN Compliance Officer (CO) will listen to the compliance line messages and receive calls daily. For periods of absence the MSHN CO shall assure appropriate and designated coverage for the line. The MSHN Compliance Officer, will prepare a compliance log for each call. The compliance log will summarize the call, and clearly identify the concern and the indicated follow up of the MSHN CO.

The MSHN CO may perform investigations in accordance with the Corporate Compliance Plan. If an investigation reveals an indication of a significant regulatory violation or fraud, the MSHN CO will inform the MSHN Chief Executive Officer (CEO) and the need for additional investigation will be evaluated. The MSHN CO will also report, as required and appropriate, to the Office of Inspector General.

An investigation report will be prepared by the MSHN CO and submitted to the MSHN CEO. The need for corrective action will be evaluated by the MSHN CEO with consultation of the MSHN CO and corporate counsel if necessary.

The MSHN CEO will determine if a self-report action should be taken by the Mid-State Health Network and will initiate such a report or delegate such action in writing to the MSHN Compliance Officer and/or corporate counsel.

The MSHN Board of Directors will receive an annual compliance report summarizing compliance activities of MSHN.

Applies to:

- All Mid-State Health Network Staff
- Selected MSHN Staff, as follows:
- MSHN's CMHSP Participants: Policy Only Policy and Procedure Other:
- Sub-contract Providers

Definitions:

MSHN: Mid-State Health Network
MSHN- CEO: Mid-State Health Network Chief Executive Officer
MSHN-CO: Mid-State Health Network Compliance Officer

Related Materials:

MSHN Corporate Compliance Plan (CCP)

References/Legal Authority:

Michigan Whistleblower's Act (PA 469 of 1980)
Michigan Medicaid Managed Special Supports and Service Contract FY 20 –7.11
Regulatory Management

Change Log:

Date of Change	Description of Change	Responsible Party
07.01.2014	New policy	Chief Compliance Officer
08.25.2016	Annual Review	Director of Compliance, Customer Service, & Quality
08.24.2017	Annual Review	Director of Compliance, Customer Service, & Quality
08.2018	Annual Review	Director of Compliance, Customer Service, & Quality
09.2019	Annual Review	Director of Compliance, Customer Service, & Quality