

Council, Committee or Workgroup Meeting Snapshot

Meeting: Regional Compliance Committee

Meeting Date: April 19, 2024

Attendees:

BABH, CEI, CMHCM, GIHN, Huron, LifeWays, MCN, Newaygo, Saginaw, Shiawassee and TBHS

MSHN Staff: Kim Z., Amy Dillon and Bria Perkins

Not Present: Right Door

\*This meeting was held by zoom only

KEY DISCUSSION TOPICS

- Agenda Review
- Follow Up from Previous Meeting
- DMC Site Review Updates
- MEV Site Reviews
- Draft OIG Quarterly Report
- SAMSHA SUD Confidentiality of Patient Records Update
- Data Analytic Platform Review
- Open Discussion

✓ KEY DECISIONS

- Additions to Agenda
  - ✓ Confidentiality statement
  - ✓ Updates to compliance policies/procedures
- Follow up from previous meeting
  - ✓ No follow up
- DMC Site Review Updates
  - ✓ Amy Dillon provided information on the new DMC site review model.
    - Revised Monitoring Program to reduce duplication and make reviews more manageable and meaningful.
    - Three-year cycle, year 1 occurring now.
    - Switched to a fiscal year review cycle.
    - Intent is to review a lot of documentation in the CRM system.
    - This does not include all audits.
    - FY24 upcoming reviews
      - HSAG EDV review (NEW)
      - HSAG Compliance Review
      - MDHHS/MSHN Waiver Program
      - HSAG PMV Review
      - HSAG NAV Review
- MEV Site Reviews
  - ✓ Bria reviewed trends related to the CMHSP site reviews and answered questions related to the MEV reviews.
  - ✓ Most findings are for attributes E & G
    - E. Services were provided by a qualified individual and documentation of the service provided falls within the scope of the service code billed.
    - G. Modifiers are within guidelines
      - Lack of IPOS documentation
      - Modifier errors
      - Unable to locate supporting documentation

- Incorrect rendering provider billed
- Incorrect service code billed
- Date/time/unit billing errors
- Averages: FY24 Q1 - 76.58 / FY24 Q2 - 77.41 / FY23 - 76.76
- ✓ Recommendations:
  - IPOS/PCP contains written signature by the consumer; parent/guardian
  - Applicable staff are trained in IPOS prior to rendering services
  - Documentation for services includes a note/narrative
  - Staff trainings, certifications are uploaded to Box
  - Evidence of voided encounters are uploaded in preparation for CAP
- ✓ Bria is currently working on a MEV Review guide which will provide information on how audit is conducted, what each attribute looks for, common finding, and FAQ's
- Draft OIG Quarterly Report
  - ✓ Two new annual reports that the OIG is requiring with new elements, will be due towards end of January each year.
  - ✓ Taking OIG quarterly report and adding new elements to make tracking easier for CMHSPs.
  - ✓ Recommended revisions to the OIG quarterly form:
    - Activities tab: AT/AU are new columns for annual submission. Dollars recovered (only for FWA cases) and Provider Specific Education.
    - Added new tab: prepayment activities
      - This includes information required on the 6.10 OIG report.
      - Do not need to complete the cost avoidance dollars for Q2. Kim still talking to OIG about this being a requirement.
      - Looking for count of claim lines denied (prepayment).
    - We need to start tracking EOBs – Section 6.5
- SAMSHA SUD Confidentiality of Patient records Update
  - ✓ Kim went over a summary document identifying the main revisions to the 42 CFR Part 2 that are most applicable to our system.
- Data Analytics Platform Review
  - ✓ Kim reviewed a summary document recommending a new data analytics platform for MSHN.
  - ✓ There were no questions related to this and the committee supported the recommendation to move to a new platform.
- Open Discussion
  - ✓ Revisions to Compliance Policies and Procedures and the Compliance Plan
    - The OIG is requiring specific language from the contract to be included in MSHN documents.
    - This has to be implemented by July 8<sup>th</sup>
    - Kim will update and send out by email for review and approval.
  - ✓ Karen Amon inquired how CMHs are addressing requirements of confidentiality statement in the EMR; BABHA does not have a statement in the ERM. Sally Culley reported that there is a link to the statement at Montcalm.

✓ **KEY DATA POINTS/DATES**

- Next Meeting: June 21, 2024 (3<sup>rd</sup> Friday of every other month from 10:00am – 12:00pm)