

Summary of Recommended Changes to FY2021 Corporate Compliance Plan

The following is a summary of the recommended changes, per section, to the FY2021 Compliance Plan.

KEY: No Revisions = no changes recommended; No Substantive Revisions = only minor additions/deletions not affecting intent

I. OVERVIEW/MISSION STATEMENT

- No Revisions

II. VALUE STATEMENT

- No Revisions

III. SCOPE OF PLAN

- No Revisions

IV. DEFINITIONS

- No Revisions

V. COMPLIANCE PROGRAM

- No Revisions

VI. STRUCTURE OF THE COMPLIANCE PROGRAM

- No revisions

VII. COMPLIANCE STANDARDS

A. Standards of Conduct and Ethical Guidelines

- No Revisions

B. Legal and Regulatory Standards

The following changes are being recommended:

- State and Federal Laws and Rules: Removed "Other Statutes Related to Municipal Organizations and Operations"
- Federal Medicaid Law, Regulations and Related Items: Added "42 CFR Part 2 Confidentiality of Alcohol and Drug use Patient Records and "Affordable Care Act"
- Other Relevant Legislation: Added "American with Disabilities Act of 1990"

C. Environmental Standards

- No Revisions

D. Workplace Standards of Conduct

- No Revisions

E. Contractual Relationships

- No Revisions

F. Purchasing and Supplies

- No Revisions

G. Marketing

- No Revisions

H. Financial Systems Reliability and Integrity

The following changes are being recommended:

- Added "claims" prior to documentation to clarify that this is not clinical documentation

I. Information Systems Reliability and Integrity

- No Revisions

J. Confidentiality and Privacy

The following changes are being recommended:

- Addition of Qualified Service Organization Agreement (QSOA)

VIII. AREAS OF FOCUS

- No Revisions

IX. TRAINING

A. MSHN Employees and Board Members

- No Revisions

B. MSHN Provider Network

The following changes are being recommended:

- Changed “Annual Training Plan” to “Regional Training Requirement”

X. COMMUNICATION

- No Revisions

XI. MONITORING AND AUDITING

The following changes are being recommended:

- Financial and Billing Integrity: Added “Fiscal Monitoring reviews for all SUD providers”
- Clinical/Quality of Care: Removed “and Provider Network staff” from the second and third bullet points and removed the fifth bullet point
- Additional Internal Monitoring and Auditing Analysis: Added “Contract Expense Monitoring”

XII. REPORTING AND INVESTIGATIONS

- No Revisions

XIII. Corrective Actions and Prevention

- No Revisions

XIV. Submission of Program Integrity Activities

- No Revisions

XV. References, Legal Authority and Supporting Documents

- No Revisions

ATTACHMENT A

- No Revisions

ATTACHMENT B

The following changes are being recommended:

- Added “ad Hoc” to the Medical Director and Corporate Counsel positions for the MSHN Corporate Compliance Committee membership

ATTACHMENT C

The following changes are being recommended to the area of focus chart:

- Separated Autism Requirements and Credentialing into two separate areas of focus
- Added section for COVID-19 and added Telehealth Requirements

ATTACHMENT D

The following changes are being recommended:

- Updated compliance officer contact information

ATTACHMENT E

- No Revisions

ATTACHMENT F

- No Revisions