

**Meeting: Regional Compliance Committee**

**Meeting Date:** October 25, 2019

**Attendees:**

BABH\*, CEI, CMHCM, GIHN, Huron\*, LifeWays\*, Newaygo\*, Saginaw\*, Shiawassee, Right Door\* and Tuscola\*

MSHN Staff: Kim Z.

Not In Attendance: MCN

\*Attendance by phone

**KEY DISCUSSION TOPICS**

- OIG Updates
- Disqualified Provider Policy/Implementation Plan
- Behavior Tech Exclusion Implementation Plan
- REMI- Quarterly Log
- Annual Committee Evaluation and Effectiveness Review
- Open Discussion

✓ **KEY DECISIONS**

- Additions to Agenda
  - ✓ *No additions*
- OIG Updates
  - ✓ FY19 Q4 Report/REMI Quarterly Log
    - The OIG quarterly report log in REMI is up and running
    - All CMHSPs now have a log in. Agencies can submit through REMI or hard copy, but MSHN would prefer to use REMI so it can produce the aggregate report for submission to the OIG.
    - Keep activity related to those resolved within the quarter.
    - Annual contracted individuals/entities list will be submitted by MSHN.
    - Challenges with tracking between quarters has been noted to the OIG.
    - Kim will include PIHP data mining activity on the quarterly report.
    - Bay-Arenac asked for a future discussion on what to include for data mining. Kim will add to next meeting agenda.
  - ✓ PIHP/OIG Meeting Updates
    - The OIG is planning on doing a presentation at the December I/O Conference aimed toward investigative process.
    - PIHP's asking for OIG to be clear about their requirements and expectations for oversight and monitoring to the field.
    - OIG has expectations at the Federal level that they are responsible for and the contract amendment #2 has added considerable amount of new requirements to Program Integrity section regarding this. Contract negotiations are still occurring so nothing is finalized yet.
    - Kim will be developing a work plan.
  - ✓ OIG Submission Process
    - Report will continue to be pass or fail.
    - Over next three years OIG will be scheduling on-site reviews with PIHP's.
    - Kim walked through the review process that OIG developed (see document) for the quarterly submission.
- Disqualified Provider Policy/Implementation Plan

	<ul style="list-style-type: none"> <li>✓ Approved in July by MSHNs Board, then Medicaid Provider Manual (MPM) came out with updates that included the exclusion information in it.</li> <li>✓ Table 1 now mirrors MPM wording for exclusions, minus the Behavior Tech exclusions as that is not included in the MPM.</li> <li>✓ Recipient Rights Substantiations needs to be clarified as requested by Ops Council.</li> <li>✓ Kim will draft language around abuse and neglect class I as clarification for reporting to MSHN and send back out to the group for review.</li> <li>✓ Concern of submitting names to MSHN is that this is yet another place that providers would need to check, or the CMH's would need to check with MSHN.</li> <li>✓ Discussed an affirmative statement that RR violations for abuse/neglect class I are cause for disqualification.</li> <li>✓ Kim reviewed the implementation plan for disqualification that was approved through Ops Council.</li> <li>• Behavior Tech Exclusion Implementation Plan <ul style="list-style-type: none"> <li>✓ MSHN is still advocating to remove the behavior tech exclusion from the public health code as it is more restrictive than other requirements.</li> <li>✓ Kim has talked with Alan Bolter (CMHA) who is trying to talk with MDHHS autism staff.</li> <li>✓ Attorney General (AG) letter to Centria stated the mental health system needs to follow the exclusion as is in the Public Health Code.</li> <li>✓ A date of April 1, 2020 was established for services provided on or after this date to be voided if BT has a criminal background.</li> </ul> </li> <li>• Annual Committee Evaluation and Effectiveness Review <ul style="list-style-type: none"> <li>✓ Reviewed the committee charter today as the annual effectiveness review is due soon.</li> <li>✓ Kim completed a draft of this past year's accomplishments as identified in meeting minutes.</li> <li>✓ The group reviewed this and was in agreement with the accomplishments.</li> <li>✓ Discussed upcoming goals. For FY20</li> <li>✓ Kim will draft and send to the group for review and feedback.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>✓ <b>KEY DATA POINTS/DATES</b></li> </ul>	<ul style="list-style-type: none"> <li>• Next Meeting: December 20, 2019 (3<sup>rd</sup> Friday of the month from 10:00am – 12:00pm)</li> </ul>