

Meeting: Regional Compliance Committee

Meeting Date: August 21, 2020

Attendees:

BABH, GIHN, Huron, LifeWays, MCN, Newaygo, Saginaw, Shiawassee and Tuscola

MSHN Staff: Kim Z.

Not Present: CEI, CMHCM and The Right Door

*This meeting was held by zoom only

KEY DISCUSSION TOPICS

- Agenda Review
- Follow Up – CLS Progress Notes
- CMHSP FY2021 DMC Site Review Tools
- MSHN Compliance Plan Review
- Data Mining
- Open Discussion

✓ **KEY DECISIONS**

- Additions to Agenda
 - ✓ No additions or revisions
- Follow up from previous meeting – CLS notes
 - ✓ Documentation of CLS when people are at end of life or on hospice can be challenging due to limited levels of ability at that point in life.
 - ✓ MSHN tries to be as lenient as possible in support of the consumer given the circumstances.
 - ✓ CMHSP's to let Kim know if they have additional suggestions/feedback.
- CMHSP FY2021 DMC Site Review Tools – Annual Review
 - ✓ Reviewed Delegated Managed Care tool change list.
 - ✓ Minimal comments on the changes.
 - ✓ Some discussion about interpretation of existing standards.
 - ✓ Site Reviewers working on inter-rater reliability and ensure findings and recommendations are differentiated. One question raised about the training grid listing for MH First Aid training for SUD providers, which appears to be a best practice versus a contractual or regulatory requirement.
- .MSHN Compliance Plan Review
 - ✓ Kim reviewed the proposed changes to the 2020/2021 Compliance Plan.
 - ✓ No significant requests for changes from the Committee.
 - ✓ Revisions look good. If any comments from CMHSP's due by next week.
- Data Mining
 - ✓ Some changes were made based on CMHSP feedback.
 - ✓ The same three activities were run again for FY20 Q2.
 - ✓ The OIG is expecting to have different data mining activities per quarter.
 - ✓ Ideas for new indicators:
 - MSHN ideas: Are we billing other insurances before Medicaid (i.e., COB)
 - CMHSP ideas: Is there something COVID-19 tele-health related that may help prevent future audit findings? Should consider data mining indicators that we believe to be under control due to EHR business logic, for purposes of checking our internal controls. Also, look at themes across the compliance investigations reported in the region 's reports to the OIG for potential indicators.

	<ul style="list-style-type: none"> ✓ Kim will send out the results for the FY20 Q2 data mining to each CMHSP soon for analysis • Open Discussion <ul style="list-style-type: none"> ✓ CMH Management of Credentialing/Training Records for Contracted Service Provider Line Staff <ul style="list-style-type: none"> ○ BABH shared all of the line staff level credentialing/training records that CMHSP's have to track (for MDHHS, MSHN and MIORR audit purposes and to ensure ABA credentialing occurs as required) with PCE and asked if they would look at developing some management tools as a 2nd wave of development for their updated provider management module. ✓ MIOHSIG Investigation Response/Status Updates <ul style="list-style-type: none"> ○ MSHN has 16 cases open with MIOHSIG dated back to 2017. Kim has created tracking and is asking OIG for updates/response. Kim trying to get closure letters from the OIG. We have not received acknowledgements from recent complaints submitted. ✓ Criminal Background Checks <ul style="list-style-type: none"> ○ MSHN has not heard anything new from MSA or the OIG regarding the need for CMHSP's to continue to perform background checks for typical providers since they are already doing them.
<ul style="list-style-type: none"> ✓ KEY DATA POINTS/DATES 	<ul style="list-style-type: none"> • Next Meeting: October 16, 2020 (3rd Friday of every other month from 10:00am – 12:00pm)