

**Meeting: Regional Compliance Committee**

**Meeting Date:** December 20, 2018

**Attendees:**

CEI, CMHCM, GIHN, Huron, MCN,  
Newaygo, Right Door, Saginaw,  
Shiawassee and Tuscola

MSHN Staff: Kim Z.

Not In Attendance: BABH and LifeWays

**KEY DISCUSSION TOPICS**

- Revised OIG Quarterly Report Template
- Medicaid Policy Bulletins
- Draft Policy for Disqualified Individuals
- Open Discussion

✓ **KEY DECISIONS**

- Revised OIG Quarterly Report Template
  - ✓ Update for the OIG Reporting information presented by OIG liaison at Improving Outcomes Conference
  - ✓ The revised template is dated 12-18-2018 and has been distributed for use for FY19 Q1
  - ✓ 1<sup>st</sup> quarter due to OIG by 2/15/2019 – for timeframe of Oct 1, 2018 through Dec. 31, 2018
  - ✓ Will need to be submitted to MSHN no later than the 3<sup>rd</sup> week of January – Kim will send out date with meeting minutes
  - ✓ The report should include any activity that was initiated during that quarter – not prior to the quarter
  - ✓ The OIG has indicated that the MEV site review findings should also be included in the quarterly report
    - There was much discussion with the OIG about this due to the volume of claims reviewed
    - This would be burdensome to the system to report when we already submit any findings related to fraud or abuse
    - This will result in duplicative reporting
    - The range of the reporting seems to be expanding beyond fraud and abuse
    - The OIG has advised us not to take action on this until it is discussed during the January PIHP/OIG compliance officers meeting
- A review of the tabs – instructions were sent out with the handouts for the October 2018 Compliance meeting
  - ✓ Activities tab- completed quarterly – needs to have all columns completed for each activity reported
  - ✓ Data Mining tab – If a CMH performs data mining, this form needs to be completed quarterly
  - ✓ Contracted entities tab – completed annually - this tab does not need to be completed for FY19 Q1
  - ✓ Disenrollment tab – completed annually – this tab does not need to be completed for FY19 Q1
  - ✓ Question: How do we report something that was initiated five quarters ago? ONLY items which were initiated during this quarter are to be reported - Initiated during this quarter, regardless of whether they were resolved or completed.
- Medicaid Policy Bulletin MSA 18-44
  - ✓ Although the Bulletin indicates a January 2019 effective date. This requirement has been in our contract since FY 18.
  - ✓ Version 5.0 has been published and is available – do not use 4.1
- Draft Policy for Disqualified Individuals
  - ✓ Kim made the adjustments to the form from the last meeting
  - ✓ No changes to the purpose or policy statement itself

	<ul style="list-style-type: none"> <li>✓ Kim intends to send this to the provider network committee after the draft policy has been agreed upon – any recommended changes will be brought back to this group for review prior to going to Ops Council</li> <li>✓ How to report and to whom? – a process will be needed (documentation and disbursement of information)</li> <li>✓ Subdivision 8 has been added since the previous version – see red</li> <li>✓ NEW SECTION – Permissive exclusions – general discussion about the pros and cons of including the permissive exclusions in the form. <ul style="list-style-type: none"> <li>▪ It was decided to remove this part of the table, but use it as a reference (the permissive exclusion list)</li> </ul> </li> <li>✓ Kim will clarify the reporting requirements</li> <li>✓ Kim added additional definitions to the form which were approved</li> <li>✓ The team was encouraged to review this form internally at their CMHSPs, including the CEOs so they are aware of the policy prior to it going to Ops Council for review</li> <li>• Open Discussion <ul style="list-style-type: none"> <li>✓ Centria <ul style="list-style-type: none"> <li>▪ Jeff Brown is now the Quality Director - MSHN has met once with Centria in the recent months- Centria requested the meeting to discuss ongoing quality issues</li> <li>▪ Jeff Brown stated it is their intent to meet ongoing with all the CMHSPs that contract with them</li> <li>▪ They will be focusing on the ongoing issues and improvement in quality</li> <li>▪ Regarding the investigation from the Attorney General – there is nothing new at this time. The Attorney General has NOT yet closed the case. Kim will let us know when the case is closed or there are further developments</li> </ul> </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: January 25, 2019</li> </ul>