

Meeting Date: June 28, 2019

Attendees:  
BABH, CEI, CMHCM, GIHN, Huron,  
LifeWays, MCN, Newaygo, Saginaw and  
Tuscola

MSHN Staff: Kim Z.

Not In Attendance: Right Door and  
Shiawassee

**KEY DISCUSSION TOPICS**

- OIG Updates
- REMI: OIG quarterly log
- Proposed Change: Overnight Health and Safety Support
- HSAG Compliance Monitoring Site Review
- MSHN Privacy Notice
- MSHN Breach Notification Templates
- Meeting Schedule
- Other
- Open Discussion

✓ **KEY DECISIONS**

- Additions to Agenda
  - ✓ Release of Information Form
- OIG
  - ✓ FY19 Q2 Report Update
    - Requests for corrections by the OIG have been completed and resubmitted.
    - The PIHP Compliance Officer Group is providing feedback to the OIG related to the reporting process.
    - Resubmission of changes to previous quarters is becoming difficult
    - Requests for corrections are not consistent with every agency
    - Requests for changes to the report are often outside of the reporting instructions
    - OIG wants to see extrapolation – most CMH's do not complete this process
    - OIG is moving toward applying monetary sanctions if the report submission is deemed as "fail" after corrections
  - ✓ May 2019 PIHP/OIG Meeting Update (power point)
    - The PowerPoint is uploaded to BOX for reference. The next meeting is in September.
  - ✓ Data Mining
    - MSHN has reported to the OIG that data mining is not done within the Region. The OIG requested a plan of correction on how we are going to implement data mining by next quarter.
    - After review, the OIG has stated the MSHN's MEV process is considered data mining.
    - CMH's are to report local data mining activities for inclusion in future reports.
  - ✓ REMI: OIG quarterly log
    - A compliance log based on the OIG report and requirements is being created in REMI.
    - The CMHSPs stated they would be interested in using this in REMI
    - Kim will talk to MSHN's programmer for PCE to see if MSHN can grant access to the CMHSPs to enter their data while keeping it confidential.
    - Kim reviewed and demonstrated features of the system
- Proposed Change: Overnight Health and Safety Support
  - ✓ Review and discussion of the recent communication from MDHHS. Kim will keep us posted on any required changes to our service delivery process.

- HSAG Compliance Monitoring Site Review
  - ✓ Confidentiality Section (new)
    - 8 to 9 standards being reviewed based off of the BBA requirements – sections have been expanded with new requirements.
    - Confidentiality section is new.
    - HSAG will want to see process (letters, etc) for a breach of information that has occurred during the identified timeframe.
    - Primary source verification of files is new this year. Sample pulled from credentialing/re-credentialing, including HCBS, and denial of prior authorizations.
  - ✓ Site Reviews:
    - HSAG Performance Measurement Validation (PMV) –
      - July 24<sup>th</sup> is the on-site review
      - PI validation. A PI data sample was pulled and primary source validation will be completed for each event. Saginaw, CEI and CMHCM were chosen for the review. HSAG reviewers will access those 3 agencies EMRs/data systems to verify BH Teds, Eligibility, PI documentation, etc.
    - 7/26 – HSAG Compliance Monitoring Site Review - case file review webinar
    - 9/16 – HSAG Compliance Monitoring Site Review – Documentation Requirements Tool Review – Kim will send out a copy of this tool for reference
    - PIP summary report is due to HSAG by 7/8/19
- MSHN Privacy Notice
  - ✓ Kim is reviewing the current Privacy Notice against the HSAG site review tool to ensure it meets all the standards- If it does not, Kim will update and resend to the network
- MSHN Breach Notification Templates
  - ✓ There are standard templates available for optional use by CMH's. These have not been required for use as long as the providers ensure the required element are within their notices/letters.
- Meeting Schedule
  - ✓ The group agreed to move to meeting every other month. The schedule will remain the 3<sup>rd</sup> Friday @ 10:00 – noon.
- Other:
  - ✓ OIG 2018 Annual Report
    - The report is in BOX. The report is completed semi-annually.
  - ✓ Standardized MDHHS Consent to Share Form
    - Question – are all contract providers listed on the form?
    - Group discussion on how the agencies are completing the forms and who is listed on the forms.
- Open Discussion
  - ✓ Talked about requirement to complete Central Registry Checks for staff who work with children, specific to PA 116 of the Public Acts of 1973.
  - ✓ The MSHN Provider Network Committee is reviewing to determine if it is necessary.

✓ **KEY DATA POINTS/DATES**

- Next Meeting: August 16, 2019 (3<sup>rd</sup> Friday of the month from 10:00am – 12:00pm)