

Council, Committee or Workgroup Meeting Snapshot

Meeting: Regional Compliance Committee

Meeting Date: November 3, 2023

Attendees:

CEI, CMHCM, GIHN, Huron, LifeWays, Newaygo, Right Door, Saginaw & Shiawassee

MSHN Staff: Kim Z.

Not Present: BABH, MCN, &TBHS

*This meeting was held by zoom only

KEY DISCUSSION TOPICS

- Agenda Review
- Follow Up from Previous Meeting
- Committee Annual Effectiveness Review
- OIG Templates
- Medicaid Policy Bulletins
- Open Discussion

✓ KEY DECISIONS

- Additions to Agenda – No additions to the agenda
- Follow up from previous meeting – No follow up
- Committee Annual Effectiveness Review
 - ✓ The committee reviewed and approved the 2023 Regional Compliance Annual Effectiveness Review. Kim will make minor updates and share the finalized version with MSHN's QAPIP.
 - ✓ The committee identified two goals from last year that will continue in FY24; identify compliance related education opportunities and review methods for assessing risks.
 - ✓ The committee discussed current methods used to assess, identify, and mitigate compliance risks. These methods include conducting internal MEV audits, Pilot Audits, implementation of Risk Management Plans, and utilizing a color-coded risk rating method. Kim has recently completed an assessment of MSHN's internal Corporate Compliance Program to determine its effectiveness by utilizing the DOJ guide and assessment template. Kim will share the results for this assessment once it is finalized by MSHN's Corporate Compliance Committee.
- OIG Templates
 - ✓ There have not been any recent changes to the quarterly OIG report template.
 - ✓ The OIG still plans to require PIHPs to submit the quarterly reports via MARIS, however, the OIG has not given PIHPs an exact date of when this will start to occur.
 - ✓ The OIG is requiring submission of an Adverse Action and Exclusion Report when a CMHSP identifies that a CMHSP staff member or a provider staff are terminated due to a reportable activity on the quarterly OIG report. This form is not new but hadn't been required until FY23Q3.
 - ✓ The committee discussed the new OIG MFCU Fraud Referral Process for fraudulent activities of \$5000 or greater. The OIG requires a brief meeting to discuss the referral; this is typically done by creating a PowerPoint. Members of the OIG and MFCU will be present.
 - ✓ The committee discussed the current referral timeline. While the OIG does not have defined timeline, Kim stated that MSHN's OIG liaison typically responds quickly and the referral meeting is usually scheduled within two weeks of the referral.
 - ✓ The committee discussed the OIG's proposed contract language which identifies more stringent monitoring and activities required from PIHPs. Kim shared that the PIHPs have submitted feedback twice to the OIG. The next round of contract negotiations will be held in the coming weeks. Kim will keep the committee informed



- Medicaid Policy Bulletins
 - ✓ The committee briefly reviewed the 23-60 Bulletin. This bulletin provides guidance for doctor to doctor consultation.
- Open Discussion
 - ✓ Susan questioned if there were any plans to update the Corporate Compliance training in Relias. Kim stated that she can see if other PIHPs are interested in making updates. Kim also stated that she would be comfortable making updates to MSHN's version of the training.
 - ✓ Kentera questioned how other CMHSPs handle verbal consents when a family member (other than parent or guardian) attend an appointment with a minor. Many of the committee members agreed that their agency allows verbal consent as long as the consent is heard by a witness aside from the service provider. Kim stated that she has been unable to locate the specific statute that provides this language, despite many PIHPs and CMHSPs following this process.

✓ **KEY DATA POINTS/DATES**

- Next Meeting: December 15, 2023 (3rd Friday of every other month from 10:00am – 12:00pm)