

Meeting: Regional Compliance Committee

Meeting Date: October 15, 2021

KEY DISCUSSION TOPICS

Attendees:

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

MSHN Staff: Kim Z.

Not Present:

*This meeting was held by zoom only

- Agenda Review
- Follow Up from Previous Meeting
- Revised Compliance Training & Post Test Review
- Annual Effectiveness Review
- Memo Rescinding “Accept Verbal Consent for Services”
- Annual Litigation Report
- HSAG Reviews
- Open Discussion
- Standing Agenda Items (As Needed)

✓ **KEY DECISIONS**

- Additions to Agenda
 - ✓ Minutes approved without revisions
 - ✓ Added coding of annual assessments and functional behavioral assessments for FY22.
 - Pam showed a crosswalk she provided for staff with new codes and modifiers and sent to the group
 - State EDIT group will be discussing more
- Follow up from previous meeting
 - ✓ N/A
- Revised Compliance Training & Post Test Review
 - ✓ Reviewed corporate compliance training PowerPoint.
 - ✓ Slides not relevant for local level could be removed at discretion of CMH
 - ✓ Updates on some slides
 - New slide for Stark Law
 - New slide for penalties for non-compliance with HIPAA; Common Vulnerabilities for Release of Protected Health Information
 - Privacy and Security Safeguards
 - HIV/AIDS Information
 - ✓ Reviewed 15 question post-test: Completion of quiz replaces attestation.
 - ✓ Once final, training will be uploaded into Relias. CMH's can use this, make edits for their agency specific information.
 - ✓ Review training and post-test and get any changes to Kim within next 2 weeks.
- Annual Effectiveness Review
 - ✓ Kim reviewed list of FY21 accomplishments
 - ✓ Added that the group made policy/procedure edits in area of compliance
 - ✓ Reviewed Goals for FY22
 - Add review of data regarding types of investigation, findings and categories of risk areas
 - Strengthen review of new Medicaid requirements, policy bulletins etc.
 - Review methods of assessing risks and findings for detection for fraud and abuse
 - Requirements of telehealth for compliance and risk points
 - Keep previous goal related to training and educational opportunities

- ✓ All agreed to edits and identification of goals
- Memo Rescinding {Accept Verbal Consent for Services”
 - ✓ Several members have sought out guidance from MDHHS and ORR.
 - ✓ BABH is giving 30 days or so for transition to implement.
 - ✓ MSHN accepts a transition process for purposes of audit.
 - ✓ Inbound email or text from a consumer providing consent is allowable per legal counsel received from BABH. Janis agreed to share copy of cover letter being sent out to consumers/guardians.
 - ✓ Consumers who have a smart phone that can be used to scan and send in is also acceptable. CMH staff should use a portal for an electronic method of obtaining signature.
 - ✓ Clarified that the consent pertains to the consent to treat and confidentiality.
 - ✓ All other signatures if verbal best practice to have witness.
- Annual Litigation Report
 - ✓ Kim gave reminder to submit this report – an email with the template has already been sent out to the group
- HSAG Reviews
 - ✓ 3rd year of PIP
 - ✓ Expecting report back from HSAG on resubmission in a couple weeks. Expecting full compliance.
 - ✓ Performance Measure Validation was in compliance, some recommendations MSHN will be looking at for implementation
 - ✓ Received draft report on compliance
 - Reviewers seem to have expanded scope on their review at the PIHP & CMH level. Example: Provider directory and ADA compliance level.
 - PIHP's seeking guidance from state on specific requirements and level of detail necessary and to provide standardized language.
 - Increased level of administrative burden is problematic.
 - HSAG wants PIHP's to do more monitoring, oversight and validation activities. This would all require more resources and more cost.
- Open Discussion
 - ✓ Montcalm has a quality analyst who will be joining the compliance meetings as part of eventual transition plan.
- Standing Agenda Items
 - ✓ OIG Kim had a meeting with OIG rep on outstanding cases
 - Seventeen open cases were reviewed
 - OIG is mostly concerned with voiding erroneous claims vs. recoupments
 - OIG has hired a manager and hoping a liaison will be reestablished
 - Some changes to the OIG reporting form are being planned

✓ **KEY DATA POINTS/DATES**

- Next Meeting: December 17, 2021 (3rd Friday of every other month from 10:00am – 12:00pm)