

## POLICIES AND PROCEDURE MANUAL

<b>Chapter:</b>	<b>Compliance</b>		
<b>Title:</b>	<b>Delinquency Procedure for SUD Providers</b>		
<b>Policy:</b> <input type="checkbox"/> <b>Procedure:</b> <input checked="" type="checkbox"/> <b>Page:</b> 1 of 3	<b>Review Cycle:</b> Biennial  <b>Author:</b> Chief Clinical Officer	<b>Adopted Date:</b> 10.23.2017  <b>Review Date:</b> 11.07.2023	<b>Related Policies:</b> Quality Management

### **Purpose**

Mid-State Health Network (MSHN) is required to submit Prevention and Treatment data and financial reports to the Michigan Department of Health and Human Services (MDHHS) on a monthly, quarterly and annual basis. MSHN also establishes region-specific deadlines for operational reports like Annual Plans and program budgets. MSHN’s ability to meet the deadlines required by MDHHS and regional deadlines for provider network oversight is dependent upon all contracted prevention and treatment providers complying with report submission due dates on a consistent basis.

### **Reporting Procedure**

All data and finance reports and budgets regarding prevention and treatment are due to MSHN on the designated due dates. Annually, providers will be given the due dates for submission of all required reports and budgets for the fiscal year. The document entitled, “Reporting Requirements for MSHN SUD Providers”, is included as an attachment to the MSHN Provider Contract and includes dates of submission and designated MSHN staff contact person(s) or locations for submission of each report. Programs are responsible for timely submission of these reports and budgets on or prior to these due dates.

Thirty (30) days prior to the report due date, MSHN staff will send SUD treatment and prevention providers email reminders with the report title, the due date, and email address for submission. A follow-up reminder email will be sent seven (7) days prior to the due date as well. Treatment and prevention providers are expected to submit the required report(s) by the deadline.

### **Authorized Extensions**

MSHN expects reports to be submitted on the appropriate due dates; however, circumstances may prevent timely submission. Therefore, an authorized extension process is in place which is to be used for such exceptions. An agreed upon extension between the program and MSHN must be established seven (7) business days prior to the due date. MSHN will review extension requests and will respond to extension requests no less than three (3) business days prior to the due date. All requests for extension should be directed to the designated MSHN staff person for that report (information can be found in “*Reporting Requirements for MSHN SUD Providers*” document attached to MSHN Provider Contract.

### **Delinquency Procedure**

Reports are considered delinquent when they are not submitted to MSHN on or prior to the designated due dates, and there has not been an extension granted by the responsible MSHN staff. If it is necessary for MSHN to call the program to receive a report, the report is considered delinquent. If a program does not meet an extension deadline, the report is considered delinquent.

It is the provider’s responsibility to contact the MSHN staff person responsible for the report as soon as the provider is aware of any difficulties in meeting any report submission due date. If the provider does not contact MSHN according to the timeframe noted above and is late in submitting reports, the following will occur:

1. A past due notice will be sent to the provider via email. The notice will be directed to the manager of the program and/or the CEO/Executive Director of the agency. The notice will identify the report title, the due date, and email address for submission.
2. The provider must respond within two (2) business days (Monday through Friday excluding Federal and State Holidays) to the past due notice by submitting the report. If the report is submitted within two (2) business days, and acknowledgement of receipt by MSHN is received, there is nothing more the provider is required to do. If the report is not received within two (2) business days, the following additional action will occur.
3. A notice of delinquency and fund withholding, due to non-compliance with contractual reporting requirements, will be sent to the provider via or email. The notice will be directed to the manager of the program and to the CEO/Executive Director of the agency notifying them that MSHN will withhold payments until the past due reports have been received.
4. Disbursement of withheld funds will occur after the report is received at the next scheduled disbursement.

The following table explains the actions to be taken with report submission:

Action Taken by Provider	Action Taken by MSHN
Report submitted on time.	Provider to receive reimbursement as scheduled.
Report not submitted by due date.	MSHN sends past due notice to the provider.
In response to past due notice, report <u>is</u> submitted within two (2) business days.	No further MSHN action taken.
In response to past due notice, report <u>is not</u> submitted within two (2) business days.	MSHN sends notice of delinquency and notification that reimbursement is to be withheld. Once Finance Department is notified report was submitted, MSHN sends disbursement of withheld funds according to next scheduled disbursement.

### **Monitoring Report Submission**

Program response to submission of reports on the designated due dates will be documented and monitored quarterly. Reporting trends will be part of an ongoing program review process. Repeated incidents of delinquency may also result in the corrective action as outlined above, up to and including monetary sanction in the form of payment withholding. A pattern of late reports by a provider will result in the following:

1. A written warning, and if the submission compliance does not improve,
2. A report to the MSHN CEO and/or Deputy Director with recommended action.
3. A report to the MSHN Board by the MSHN CEO with recommended action.

### **Applies to:**

- All Mid-State Health Network Staff
- Selected MSHN Staff, as follows:
  - MSHN's Affiliates:  Policy Only     Policy and Procedure
  - Other: Sub-contract Providers

**Definitions:**

CEO: Chief Executive Officer  
MDHHS: Michigan Department of Health and Human Services  
MSHN: Mid-State Health Network  
SUD: Substance Use Disorder

**Other Related Materials:**

MSHN SUD Provider Contract  
MSHN Compliance Plan  
MSHN Compliance Contract Non-Compliance Procedure  
MSHN Finance Capitation Payments and Budget Procedure  
MSHN Finance Reporting Procedure  
MSHN Finance Substance Use Disorder Income Eligibility & Fee Determination Procedure  
MSHN Provider Network Management Provider Appeal Procedure  
State of Michigan/PIHP Contract: Reporting Requirements

**References/Legal Authority:**

N/A

**Change Log:**

<b>Date of Change</b>	<b>Description of Change</b>	<b>Responsible Party</b>
10.23.2017	New Procedure	Director of Compliance, Customer Service & Quality
09.2018	Annual Review	Director of Compliance, Customer Service & Quality
09.2019	Annual Review	Director of Compliance, Customer Service, & Quality
08.2021	Biennial Review – Updated references	Chief Compliance and Quality Officer
08.2023	Biennial Review – Updated reference	Chief Compliance and Quality Officer