6/18/2025: Revised

MSHN Compliance Related Updates Change Log

The following is a brief summary of the changes to the MSHN 2025 Compliance Plan. All revisions are based on findings made by the Office of Inspector General after review of our annual submission of Report 6.9. For complete information on the changes, please refer to the MSHN 2025 Compliance Plan.

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| **Document** | **Change** |
| [**2025 MSHN Compliance Plan**](https://mshn.app.box.com/file/1509916926490) |
| VI. Structure of the Compliance Program, A. General Structure | Added that the MSHN Board of Directors receives routine reports and recommendations made by the MSHN Compliant Committee.  |
| IX. Training, A. MSHN Employees and Board Members  | Added that Board members are required to sign certification of training.  |
| X. Communication | Added that open lines of communication include MSHN staff |
|  | Added that information will be shared that is related to procedure changes, regulatory changes and contractual changes |
|  | Added that contact information will be shared with the subcontractors and network providers at least annually |
| XI. Monitoring and Auditing | Added language that this included other MDHHS requirements. |
|  | Added that auditors must be independent from the department being audited, competent to complete the audits and that resources are available. |
|  | Added that written reports will be provided to senior management with findings and recommendations. |
|  | Added that periodic evaluations will be completed.  |
|  | Added that network providers need to be enrolled in the Michigan Medicaid Program via the State’s Information System.  |
|  | Added that data mining activities will be performed at least annually |
| XII. Reporting and Investigations. A. Reporting of  Suspected Violations and/or Misconduct | Added that the MSHN Compliance Officer will refer all potential fraud, waste and abuse through the FTP site |
|  | Added that encounter claims will be recouped as authorized by the OIG within the required timeframes. |
|  | Added that we need to ensure applicable appeal periods have been exhausted before adjusting encounter claims.  |
|  | Added that MSHN will provide an initial findings report to the OIG within the designated timeframe. |
| XIII. Corrective Actions/Prevention/Disciplinary  Guidelines | Added that disciplinary action may be imposed for failure to detect noncompliance when routine observation should have provided adequate clues to put on notice.  |
|  | Added that violations such as misconduct or retaliation will carry more action.  |
|  | Added a list of what the disciplinary action will include. |
| XIV. Submission of Program Integrity  Activities/report | Added information on pre-payment reviews. |
|  | Added that MSHN can request a one-time extension in writing to extend a required due date. |
| Attachment D | Updated to include CMHSP addresses |
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