

Meeting Date: December 16, 2022

Attendees:

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

MSHN Staff: Kim Z.

Not Present: TBHS

*This meeting was held by zoom only

KEY DISCUSSION TOPICS

- Agenda Review
- Follow Up from Previous Meeting
- FY22 Annual Compliance Summary Report
- Proposed Revisions to 42 CFR Part 2
- OIG Revised Quarterly Report
- PIHP/MDHHS OIG Meeting Updates
- COFR & CCBHCs
- MCPAR
- Open Discussion
- Standing Agenda Items (As Needed)

✓ **KEY DECISIONS**

- Additions to Agenda
 - ✓ Minutes approved without revisions
 - ✓ No additions to the agenda
 - ✓ Welcomed new member from Shiawassee
 - Dirk (Shiawassee) will be retiring
- Follow up from previous meeting
 - ✓ MCPAR
- FY 22 Annual Compliance Summary Report
 - ✓ Reviewed MSHN Annual Compliance Summary Report. Reviewed areas of risk identified for 2022 and status of actions taken and recommendations for 2023; added one area of focus for 2023 related to credentialing and provider qualifications.
 - ✓ Discussed audits/reviews and committee support for MSHN to set a % score of less than 100% that is still considered “in compliance” and not requiring CA; then focus on areas that need more focus/are not scoring as well.
 - ✓ Approved
- Proposed Revisions to 42 CFR Part 2
 - ✓ Some changes proposed from HHS/SAMHSA related to SUD information privacy changes.
 - ✓ Reviewed the press release of 11/28/22 of proposed changes: still requires consent via a release to share for treatment, payment and health care operations
 - ✓ Permitted redisclosures; request for disclosures
 - ✓ New enforcements with monetary penalties
 - ✓ Updated breach notifications; updated privacy notifications
- OIG Revised Quarterly Report
 - ✓ No additional changes in the report template and guidance document
 - ✓ We are NOT required to report data on EOB’s—but is expected we may have to do this for 2024
 - ✓ Everyone doing well with the new form for FY22Q4 test reporting. New form is effective for FY23Q1 reporting ongoing.

- PIHP/MDHHS OIG Meeting Updates
 - ✓ Kim shared PowerPoint from last meeting
 - ✓ Reviewed FY23 Contact Changes
 - ✓ MSHN will have to upload to their MARIS (Medicaid Audit Recovery & Investigation System) via purchase of a license starting sometime in FY2023
 - ✓ New change: Report fraud issues and overpayments of \$5K or more on fraud referral report; anything under just put on the quarterly report. Overpayments will be moved to Audits sections.
- COFR & CCBHC's
 - ✓ Bay and Montcalm have had situations where the CMH providing services with whom they had a COFR agreement took over all financial responsibilities for the consumer in their county as that provider CMH was a CCBHC, and the original CMH (Bay/Montcalm) closed the consumers case.
 - ✓ Discussion: general determination from June 2022 CCBHC/MSHN workgroup was that is the process, but if there are services being provided that are NOT covered as a CCBHC, then the originating/home CMH would need to have a COFR arrangement with the provider CMH.
 - ✓ Appears there may be some need to clarify who is responsible for reporting which services.
- MCPAR
 - ✓ What are people doing in regard to defining what LTSS's should be?
 - ✓ MSHN is working with PCE to get information pulled; worked on code set that falls under LTSS codes.
 - ✓ MSHN has asked for a final ruling from MDHHS on what codes fall under LTSSs and advocating for statewide consistency.
- Open Discussion
 - ✓ No issues brought up during today's meeting

✓ **KEY DATA POINTS/DATES**

- Next Meeting: February 17, 2023 (3rd Friday of every other month from 10:00am – 12:00pm)