

## Summary of Changes: Compliance Plan 2025

*The following changes were made to be in compliance with contract changes to the program integrity section of the MDHHS/PIHP Contract.*

- I. Overview/Mission Statement
  - *No Changes*
- II. Value Statement
  - *No Changes*
- III. Scope of Plan
  - *No Changes*
- IV. Definitions
  - *No Changes*
- V. Compliance Program
  - A. Plan
    - *No Changes*
  - B. Policies and Procedures
    - *No Changes*
- VI. Structure of the Compliance Program
  - A. General Structure
    - *No Changes*
  - B. Compliance Officer
    - *Added: The CEO, chief financial officer (CFO), and chief operating officer (COO), or any other individuals operating in these roles, may not operate in the capacity of the compliance officer.*
  - C. Regional Compliance Committee
    - *No Changes*
  - D. MSHN Corporate Compliance Committee
    - *No Changes*
- VII. Compliance Standards
  - A. Conduct and Ethical Guidelines Standards
    - *No Changes*
  - B. Legal & Regulatory Standards
    - *No Changes*

- C. Environmental Standards
    - *No Changes*
  - D. Workplace Conduct Standards
    - *No Changes*
  - E. Contractual Relationships
    - *No Changes*
  - F. Purchasing and Supplies
    - *No Changes*
  - G. Marketing Standards
    - *No Changes*
  - H. Financial Systems Reliability and Integrity
    - *No Changes*
  - I. Information Systems Reliability and Integrity
    - *No Changes*
  - J. Confidentiality and Privacy
    - *No Changes*
- VIII. Areas of Focus
- *Added: Areas of focus are developed from recommendations from the previous year compliance effectiveness review*
- IX. Training
- A. MSHN Employee Training
    - *No Changes*
  - B. Provider Network Training
    - *No Changes*
- X. Communication
- *No Changes*
- XI. Monitoring and Auditing
- *No Substantial Changes*
- XII. Reporting and Investigation
- A. Reporting of Suspected Violations or Misconduct
    - *Added: To the extent consistent with applicable law, including but not limited to 42 CFR Part 2, HIPAA, and the Michigan Mental Health Code*
    - *Added: MSHN will follow the procedures and examples contained within the processes and associated guidance provided by MDHHS-OIG.*
    - *Added: Narrative that MSHN will include a provision in all contracts with subcontractors and/or network providers giving MSHN the right to*

*recover overpayments directly from providers for the post payment evaluations initiated and performed.*

B. Process for Investigation

- *No Changes*

XIII. Corrective Action/Prevention/Disciplinary Guidelines

- *No Changes*

XIV. Submission of Program Integrity Activities/Report

- *Added: The report will include an attestation confirming compliance with the requirements found in 42 CFR 438.608 and 42 CFR 438.610.*

XV. Communication of Requirements

- *No Changes*

XVI. References and Supporting Documents

- *Updated links*

Attachments:

A. List of MSHN Compliance Policies/Procedures

- *Updated link*

B. MSHN Compliance Organizational Chart

- *No Changes*

C. MSHN Areas of Focus

- *Removed current areas of focus and replaced with FY2025 recommendations*
- *Added: Monitor to ensure effectiveness and compliance with identified standards for SUD access implementation*

D. MSHN Compliance Violation Reporting Posting

- *Updated contacts*