

Meeting: Regional Compliance Committee

Meeting Date: February 19, 2021

Attendees:

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

MSHN Staff: Kim Z.

Not Present: Newaygo and Huron

*This meeting was held by zoom only

KEY DISCUSSION TOPICS

- Agenda Review
- Follow Up from Previous Meeting
- MSHN Strategic Plan Feedback
- H2015 memo
- Data Mining
- Open Discussion

✓ **KEY DECISIONS**

- Additions to Agenda
 - ✓ Documentation for clinical determination for telehealth
 - ✓ Government entity not needing an SUD license
 - ✓ MDHHS Quality of Service Review
- Follow up from previous meeting – N/A
- MSHN Strategic Plan Feedback
 - ✓ Kim provided some background to the MSHN Strategic Planning Process
 - ✓ The document has gone through the Operations Council. Now, it is being reviewed by other MSHN Committees for feedback.
 - ✓ Kim reviewed the narrative of the document and described each of the Aims in greater detail. The new Aim this year is “Better Equity”.
 - ✓ Kim described some of the Key Assumptions and Planning Questions and Key Questions. Planning Questions – Does the Council/Committee concur with these assumptions:
 - ✓ Discussion by the Committee – Issues about the integrity of the Triple Aim. CMHSPs aren’t standard “Health Care Provider”, but we are a provider of Specialty Supports/Services provider.
 - ✓ Concerns about quality of care when it comes to Telehealth. Telehealth can create some risks with respect to treating our vulnerable populations.
 - ✓ Discussion questions/dialogue:
 - The Council concurs with the Key Questions. There were concerns expressed regarding pursuing NCQA Accreditation and the burdens that moving forward might represent. There were concerns that pursuing NCQA would draw resources away from the providing supports/service. NCQA Accreditation focuses more on Utilization Management vis-à-vis Person Centered Planning processes.
 - Some concern was expressed regarding inclusion of the statement, “And to what extent does the regional delegation model impact future options and current effectiveness/efficiency?”
 - ✓ **ENVIRONMENTAL SCAN** – Kim provided a summary of Strengths/Weaknesses and then reviewed the Planning Questions.

	<ul style="list-style-type: none"> ○ <u>STRENGTHS:</u> It was noted that the CMHSP's appreciate the opportunity to participate on Committees and Councils. That's a real strength. Perhaps to clarify what is meant by "Provider Network". Does this include the SUD Providers? <ul style="list-style-type: none"> ▪ Another strength is that the MSHN staff are receptive to feedback and willing to work collaboratively with the CMHSP's. Not just the "Delegated Model", but "The Spirit of how it's done". ○ <u>WEAKNESSES:</u> <ul style="list-style-type: none"> ▪ With respect to the "MSHN PHIP is not accredited", it was noted that this might not be a weakness, unless MSHN is wanting to be something that we are not. Moreover, the MDHHS contract does not mandate that the PIHP be Accredited. ▪ Should MSHN do more to pursue Information Technology to facilitate Integrated Health Care. ○ <u>IDENTIFIED THREATS:</u> <ul style="list-style-type: none"> ▪ System Redesign – System of care is very fragile. DCW shortage/crisis ▪ Budget ▪ Staffing <p>✓ It was noted that there were several sections that still needed to be reviewed. The group discussed having an additional meeting on 3.19.21 from 9-10:30 a.m. Stefanie agreed to continue to take minutes.</p> <ul style="list-style-type: none"> ● H2015 Memo <ul style="list-style-type: none"> ✓ Replacing the H0043 code with H2015 ✓ Discussed the "preponderance rule" ● Data Mining <ul style="list-style-type: none"> ✓ Currently the Death Data mining activity is being completed ● Open Discussion <ul style="list-style-type: none"> ✓ Documentation for clinical determination for telehealth <ul style="list-style-type: none"> ○ Pended until next meeting ✓ Government entity not needing an SUD license <ul style="list-style-type: none"> ○ Not needing a SUD License – Pend until next meeting. ○ LARA is stating that governmental entities don't need to be licensed to provide services. What about the requirement that CMHSP's need to be SUD Licensed in Michigan to use the HH and HHTG Modifiers. ✓ MDHHS Quality of Service Review <ul style="list-style-type: none"> ○ Have the other CMHSP's been contacted to participate in this type of review process. It appears that no other board has been contacted regarding this type of inquiry. ○ These types of reviews are not initiated by BHDDA. They seem to be going directly to the CMHSP and initiated by the Child Welfare Program.
<p>✓ KEY DATA POINTS/DATES</p>	<ul style="list-style-type: none"> ● Next Meeting: April 16, 2021 (3rd Friday of every other month from 10:00am – 12:00pm)