

Summary of Recommended Changes to the 2023 Corporate Compliance Plan

The following is a summary of the recommended changes, per section, to the 2023 Compliance Plan.

KEY: No Revisions = no changes recommended; No Substantive Revisions = only minor additions/deletions not affecting intent

I. OVERVIEW/MISSION STATEMENT

- No Substantive Revisions

II. VALUE STATEMENT

- No Revisions

III. SCOPE OF PLAN

- Revisions include the following
 - Added sanctions and termination as possible action taken to Provider Network for failure to comply with the Compliance Plan

IV. DEFINITIONS

- No Substantive Revisions

V. COMPLIANCE PROGRAM

A. Compliance Policies

- No Revisions

B. Compliance Plan

- No Substantive Revisions

VI. STRUCTURE OF THE COMPLIANCE PROGRAM

A. General Structure

- No Substantive Revisions

B. MSHN Compliance Officer

- No Revisions

C. Regional Compliance Committee

- No Revisions

D. MSHN Corporate Compliance Committee

- No Revisions

VII. COMPLIANCE STANDARDS

A. Standards of Conduct and Ethical Guidelines

- No Revisions

B. Legal and Regulatory Standards

- No Revisions

C. Environmental Standards

- No Revisions

D. Workplace Standards of Conduct

- No Revisions

E. Contractual Relationships

- No Revisions

F. Purchasing and Supplies

- No Revisions

G. Marketing

- No Revisions

H. Financial Systems Reliability and Integrity

- Revisions include the following:
 - Removed references to fraud, abuse and waste and replaced with assuring appropriate documentation is available as needed to support claims payments and cost reimbursements

I. Information Systems Reliability and Integrity

- No Substantive Revisions

J. Confidentiality and Privacy

- No Substantive Revisions

VIII. AREAS OF FOCUS

- No Revisions

IX. TRAINING

A. MSHN Employees and Board Members

- No Substantive Revisions

B. MSHN Provider Network

- No Substantive Revisions

X. COMMUNICATION

- No Revisions

XI. MONITORING AND AUDITING

- No Substantive Revisions

XII. REPORTING AND INVESTIGATIONS

A. Reporting of Suspected Violations and/or Misconduct

- No Substantive Revisions

B. Process for Investigation

- No Revisions

XIII. Corrective Actions and Prevention

- No Revisions

XIV. Submission of Program Integrity Activities

- Revisions include the following:
 - Updated the name of the new quarterly report
 - Removed references to the identification and investigation of fraud, waste and abuse as well as corrective action plans implemented to match the new contract language

XV. References, Legal Authority and Supporting Documents

- Revisions include the following:
 - Updated links to reference materials

ATTACHMENT A

- No Revisions

ATTACHMENT B

- No Revisions

ATTACHMENT C

- Revisions include the following:
 - Added OHH, BHH, CCBHC and 1915i to the area of focus table

ATTACHMENT D

- Revisions include the following:
 - Changes to CMHCM and TBHS Compliance Officers information

ATTACHMENT E

- Revisions include the following:
 - Recommend removing the fraud referral form and replacing with a link