



PINES BEHAVIORAL HEALTH

Branch County Community Mental Health Authority
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PROVIDER NEWSLETTER December 2018

SWMBH Disclosure Forms

As you are all aware Pines Behavioral Health requires a SWMBH Disclosure form each year with a new contract. Our providers have been very helpful with completion of this document that is required. But did you know that these forms must be updated within 30 days of any changes that may occur? For example, if a Board Member changes or other information changes. You would need to submit an updated Disclosure form to me. I will then ensure that SWMBH gets the updated document.

The reason we require this document is this:

Federal law prohibits PIHPs from knowingly having a relationship with an individual who is debarred, suspended or otherwise excluded from participation in any federal health care program or with anyone who is an affiliate of such individual. A PIHP may not have as a director, officer, partner, consultant or provider, who is debarred, suspended, or excluded from any health care program, including the Medicaid program. This reaches to our providers and their employees as well (which is why we require the OIG and SAM verifications). The Disclosure form you submit at least annually to me ensures that SWMBH can facilitate the process of checking the Exclusion Lists for all provider entity "Screened Persons".

SWMBH and Pines Behavioral Health rely on all of our providers to assist us in order to be compliant with the regulatory requirements around ensuring that we don't have a business relationship with any provider entity or individual that is debarred, suspended, or excluded. We welcome any questions or concerns you may have about this process. You can contact Shelley Cizio at 517-278-2129 extension 238.



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HSCB update

HCBS over-arching Principle

To ensure individuals receiving Medicaid funded HCBS services have the opportunity to receive them in a way that promotes individual choice and community integration.

Home and Community Based Setting requirements:

- ◆ The HCBS requirements establish an outcome oriented definition that is focused on the customer's experiences.
- ◆ The requirements maximize opportunities for customers to have access to community living and opportunities to receive services in the most integrated setting.
- ◆ The Home and Community Based settings must be integrated and support access to the community

HCBS Provide opportunities for Customers in the following areas:

- ◆ Employment in competitive integrated settings
- ◆ Engagement in the community
- ◆ The ability to control personal resources
- ◆ Customer receiving services in the community should have the same degree of access as individuals not receiving HCBS
- ◆ Optimize individual initiative, autonomy and independence
- ◆ Facilitate individual choice in services and supports including who provides them.

Qualities of an HCBS compliant setting

- ◆ Provides full access to the community
- ◆ The setting is selected by the customer among options
- ◆ Ensures right to privacy, dignity and respect
- ◆ Optimizes autonomy and independence in making life choices
- ◆ Facilitates customer choice regarding service providers



Holidays observed

Pines Behavioral Health will be observing the upcoming holidays and will be closed on the following dates:

Christmas Holiday

- ◆ Monday December 24, 2018
- ◆ Tuesday December 25, 2018



New Year's Holiday:

- ◆ Monday, December 31, 2018
- ◆ Tuesday, January 1, 2019

*As always Pines will have our on call team available 24 hours per day for any crisis that arise during these holidays.

Incident Reports

An Incident Report needs to be completed when any unusual incident occurs. Incident reporting is crucial, and can impact a provider's care home licensure and external provider contract if not completed as required.

The definition of an unusual incident is "any occurrence that disrupts or adversely affects the course of treatment or care of an individual, or the agency/program management or administration." External providers who witness, discover or are notified of an unusual incident as defined above shall complete an incident report. The incident report shall be completed during the shift in which the incident occurred and submitted to Pines Behavioral Health within 24-hours, or the next business day. These may be faxed to 517-279-8172 or dropped off at Pines Behavioral Health (200 Vista Drive, Coldwater MI 49036).

Please submit incident reports for any customer that you serve under the Pines Behavioral Health contract.

Unusual incident requiring an IR include, but are not limited to the following:

- Any significant physical altercation involving any customer (customer to customer; customer to non-customer; customer to staff).
- Any explained or unexplained injury of a customer and accidents which could have caused the injury.
- An unusual or first-time medically related occurrence, such as seizures.
- Environmental emergencies or incidents that could have caused injury such as breaking things, attacking people, or setting fires.
- Suicide Attempt
- Problem behaviors not addressed in the treatment or behavior plan such as breaking things or minor self-injurious behaviors.
- Suspected abuse or neglect of an individual. When a report is made to APS or CPS, the content of the IR form can refer to the DHS 3200 document (and then attach the DHS 3200 Reporting form to the Incident Report).
- Inappropriate sexual acts not covered in a behavior plan.
- Medication errors or refusals; any medication variances.
- Suspected criminal offenses involving customers.
- Use of physical intervention.
- Interventions that are restrictive/intrusive and not covered in a behavior plan.
- Involvement of other agencies (i.e. police, hospital, Licensing, Protective Services, etc.)
- Any unauthorized leave of absence of a customer.
- The death of a customer.
- Any disclosure of protected health information without written customer authorization (i.e. Duty to Warn).

Specialized Residential Services

Emergency Bags in Specialized Residential Settings



According to MDHHS Site Reviewers all Specialized Residential Setting must maintain Emergency bags . These bags should minimally contain a radio, flash light, batteries, depends/ diapers (as appropriate), protective gloves, auto and house keys, rain coats/ponchos, blankets (thermal), snacks and bottled water with purchase or expiration dates clearly identified, sugar free snack (for diabetics if needed), staff and guardians contact information and consumer profiles.

Many emergency bags are very heavy and difficult to transport. Homes may want to purchase wheeled emergency bags to promote ease of movement during emergencies. This may be particularly helpful for those homes with non-ambulatory individuals.



Corporate Compliance Audits

Pines Behavioral Health's Corporate Compliance Program includes monitoring and auditing of services provided to Medicaid recipients. We audit internal services and services provided by the Pines External Provider Network. The monitoring tool is designed to detect documentation issues, billing issues and practices that are not consistent with ethical behavior.

Audit samples are selected using a random (RATSTATS) selection of dates of services from claims paid within the Care management system. A probe sample is chosen which ensures that all providers are audited during the fiscal year.

There will be two times during the fiscal year that external provider audits will be conducted:

- ◇ April 2019 - review of service claims from the 1st and 2nd Quarter of Fiscal year 2019
- ◇ October 2019 -review service claims from the 3rd and 4th Quarter of Fiscal year 2019

Providers will receive requests to submit documentation of the service dates chosen in the sample (if not already submitted). Pines will ensure that audit results are provided back so that any necessary corrective actions can be implemented.

The results of the routine, ongoing reviews (audits and monitoring) will be reviewed by the compliance committee and summarized for the Board. The audits will aid Pines in identification of risk areas and develop a plan to remediate issues that are discovered.

If at any time during the auditing process a provider has a question or concern you may reach Shelley Cizio at 517-278-2129 extension 238 or by email at scizio@pinesbhs.org.



Provider Feedback Request

Pines Behavioral Health welcome your ideas and input. If you, as a provider have any suggestions on how we can better serve our consumers please let us know. Below you will find contact information to voice your suggestions.

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Branch County Community Mental Health Authority
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Phone: (517) 278-2129 ext. 238
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Recipient Rights training

- Initial Rights training: 4th Wednesday of each month at 10:00 AM for three hours.
- Re-Certs will be conducted quarterly as a Rights Fair. Provider staff can drop in anytime during the day (times to be determined) and complete the review and test. Schedule will be sent via email for January 2019 forward.
- **As always please phone to provide names of staff you wish to enroll in any initial rights training 517-278-2129—Ask for Recipient Rights.**