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| **MONTCALM CARE NETWORK PROCEDURE 611 North State Street, Stanton, MI 48888** | |
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| SUBJECT: Recipient Rights, Corporate Compliance and Contract  Monitoring of Contracted  Providers | Section: 7123E |
| Effective Date: September 1, 2005 | Revised Date: April 18, 2011; November 22, 2013; February 28, 2018 |
| Version: 4 | Status: Current |

Montcalm Care Network will assure that contracted providers comply with all of the terms of our contracts with them, with all applicable Recipient Rights policies, and applicable State and Federal laws. In addition to ongoing monitoring that is a part of the day-to-day activities of the Agency, providers who deliver services at their site and who do not participate in the Agency's internal processes, will be evaluated based on periodic site visits and/or document reviews to ensure a uniformly high standard.

# Recipient Rights

Site visits will be scheduled annually, or more frequently, if necessary for all residential and inpatient psychiatric providers. Reviewers will examine the following:

1. Record Review
   1. Notification of Rights
   2. Informed Consents

iii. Treatment Planning/Person-Family Centered Processes

1. Environment
   1. Safety
   2. Sanitary
   3. Humane
   4. Communication
   5. Civil Rights
   6. Confidentiality
   7. Least Restrictive
   8. Seclusion/Restraints
2. Rights System
3. Training
4. Policies and Procedures

# Quality/Competency Review & Contract Compliance

Quality & Competency reviews will be conducted for provider organizations on an annual basis to determine continued competency of service provision and compliance with contractual requirements. Annual reviews may be conducted as a desk audit or on-site review, and may include such activities as service observation, consumer and staff feedback, review of contractors own performance reports & activities, and document reviews. The following are examples of documentation that may be reviewed: A. Current license and/or accreditation and liability insurance.

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1. Processes for ensuring health information is kept confidential and protected from unauthorized disclosure.
2. Processes for assuring staff are trained in Cultural Competency and Limited English Proficiency resources.
3. Processes for prohibiting discriminatory practices against employees or applicants for employment, as well as in the treatment of consumers, recipients, patients or referrals.
4. Processes for conducting criminal background checks, licensure verifications and credentialing of staff.
5. Compliance program/plan.

MCN will accept satisfactory findings from a review conducted by another CMHSP Board in lieu of the above documentation requirements.

Note: All Independent Contractors privileged by MCN are excluded from the above outlined review process.

# Claims Review/Verification

As part of the regional claims verification process, all providers of Medicaid Services (with the exception of hospitals and residential homes) will be periodically reviewed based on a random sampling methodology (#5300A).

# Exclusion or Debarment

As part of its ongoing compliance checks, all providers will be verified as absent from exclusion to participate in Medicare or Medicaid Programs, including those individuals with ownership or controlling interest and/or who are managing employees in the provider organization (#11100A).

Providers will be notified as to the findings of each site visit and document review. Any areas of noncompliance will be addressed through corrective action and/or as otherwise established in the provider contract. Evidence of Recipient Rights site visits are maintained by the Rights Officer. Evidence of document reviews and claims verification are maintained in the provider file and/or compliance office. MCN will ensure that any follow up or remedial action to bring contracted providers into compliance with MDHHS-ORR standards will be addressed and completed.

Summaries from the above reviews will be included in the annual QAPIP report. Summary reports will be made available to providers, individuals, families, advocates, and the public upon written request.