

NORTHPOINTE BEHAVIORAL HEALTHCARE SYSTEMS

POLICY TITLE: Contract Provider Management and Communication

PAGE: 1 of 3

MANUAL: Administrative

SECTION: Contracts

ORIGINAL EFFECTIVE DATE: 10/1/14

BOARD APPROVAL DATE: 8/28/14

REVIEWED/REVISED ON DATE: 2/15/18

CURRENT EFFECTIVE DATE: 4/1/18

REVISIONS TO POLICY STATEMENT: YES NO

OTHER REVISIONS: YES NO

APPLIES TO: Northpointe contract providers

POLICY

It is Northpointe's policy to ensure that direct service providers are oriented and aware of all information necessary to provide care to beneficiaries and for all providers to comply with the organization's administrative requirements.

PURPOSE

To ensure Northpointe's responsibility for maintaining and continually evaluating an effective provider network adequate to fulfill the obligations of the Michigan Department of Health and Human Services (MDHHS) /PIHP Specialty Services and Supports Contract and Substance Abuse Block Agreement. Northpointe is accountable for the beneficiaries in its service area, regardless of the functions it has delegated to its contracted providers. Northpointe will maintain regular means of communicating and providing information on changes in policies and procedures to its contract providers.

GENERAL PROCEDURES

I. All Providers:

- A. Each contract is assigned a responsible manager. The responsible manager serves as the NBHS liaison for the provider. Responsibilities of the responsible manager:
1. Initially, annually, and with any major changes that would require a contract amendment: review the contract to ensure any regulatory requirements are up to date and included, the statement of work is accurate and reflective of the work needed, and the reporting/documenting mechanisms for time worked/services provided is clearly communicated.
 2. Approves all invoices for services provided prior to payment to the provider, ensures there is documentation for services billed, and any assigned work is completed.
 3. Communicates any agency concerns regarding quality of work, non-compliance with regulatory requirements, and requests an action plan to correct any areas of concern.
 4. Communicates to the CEO, or designee, areas of concern/non-compliance which have not been corrected and/or which demonstrate breach of contract.
 5. For direct care providers, periodically checks to ensure clinical documentation is in compliance with regulatory and agency requirements
- B. Changes in Rates or Contracting Provisions - provider contracts contain the terms for provision of services, reimbursement rates and contract provider responsibilities. Changes in rates or contracting provisions are communicated to contract providers as outlined in the contract document.
- C. Contract providers with questions regarding orientation materials or requiring assistance regarding provider issues throughout their time as a participating contract provider may contact a Northpointe representative as listed in the Provider Manual and/or the Responsible Manager.
- D. Contract providers with suggestions and guidance information about how to best serve Northpointe individuals can contact the applicable Northpointe representative as listed in the Provider Manual.

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E. Northpointe will communicate with contractors who perform delegated functions for Northpointe regarding changes that impact compliance. Communication is ongoing in addition to annual performance review, requests for corrective action and follow-up as necessary.

F. It is the responsibility of the provider to notify the Responsible Manager if they feel additional training is needed in any given area.

II. Direct Service Providers-Contracts for services as indicated in the Medicaid Provider Manual

A. New participating providers will be oriented through the receipt of an Orientation Packet.

The Orientation Packet includes (at a minimum):

1. Northpointe Provider Manual(s)
2. How to access Northpointe Policies and Procedures
3. Providers will also be trained on Northpointe's information systems, as appropriate.

B. Providers receive updates through mechanisms such as the following:

1. The Provider Manual and applicable NBHS policies/procedures are available on the Northpointe website at www.nbhs.org
2. Email communication with changes/updates to the Provider Manual and policies/procedures will be dispersed monthly.
3. Provider meetings

C. Updated benefit and eligibility information for Northpointe Medicaid recipients is available online in the Michigan Medicaid Manual <http://www.michigan.gov>

III. Other Contract Providers-Contracts for goods and services

A. New participating providers will be oriented through the receipt and acceptance of the terms and conditions of the contract. Site specific orientation/training by the responsible manager will occur as needed.

CONTRACT FILE MANAGEMENT PROCEDURES: A master list of the contracts with contract type, expiration date, necessary document expiration dates (credentialing, privileging, licensure, liability insurance, etc.), contact person, and contact information is maintained in an ACCESS database. Contracts and supporting documentation will be organized electronically as PDF files on the agency shared drive in a designated folder "Contracts" by legal name of the contract provider. Draft working WORD documents will be maintained as templates in the event of a renewal with the watermark 'DRAFT'. Access will be granted in 2 ways: permission to view and permission to modify. Only responsible managers will be given access to view the contract folder. The CEO, CFO, and Administrative Assistant responsible to maintain the files will be given access to modify. A paper folder with to the current year's documents will be kept as a backup and shredded once the contract is void. Electronic contract files will be maintained for a period of 6 years from the time of contract expiration per the State of Michigan Records Retention and Disposal Schedule GS20 for Community Mental Health Service Programs.

I. Establishing a new contract: contract and credentialing file contents

1. Direct Care Providers

- a. Completed Individual or Organizational Credentialing Application as applicable
- b. Copies of any applicable current licensure/certification
- c. Liability insurance coverage certification
- d. Completed Disclosure of Ownership, Controlling Interest and Management Statement

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Attestation of Criminal Convictions, Sanctions, Exclusions, Debarment or Termination form

- e. Submission of privileging form as applicable by the Responsible Manager
 - f. Organizational Provider Routing Form or Employee and Individual Contract Provider Routing Form to be completed by the Administrative Assistant, routed to the Responsible Manager for second review, final review by Senior Clinical Leader, submitted to Credentialing Committee for final approval.
 - g. Provider will be added to an email listing to receive Provider Manual and policy/procedure updates.
 - h. Provider will be added to the Northpointe Provider Directory as applicable
2. Other Contract Providers
- a. Copies of any applicable current licensure/certification
 - b. Liability insurance coverage certification
 - c. Completed Disclosure of Ownership, Controlling Interest and Management Statement
Attestation of Criminal Convictions, Sanctions, Exclusions, Debarment or Termination form

II. Contract File Maintenance

- a. Monthly OIG/SAM checks are completed through VerifyComply. Any provider that is found to be sanctioned or disbarred will be brought to the attention of the CEO, or designee; contract will be terminated per terms and conditions of the contract.
- b. Any certifications, licensure, or other necessary items expiring during the contract year will be replaced with renewals. Any expiration without renewal of necessary items per the contract will be brought to the attention of the CEO, or designee; contract will be terminated per terms and conditions of the contract.

III. Contract Renewal

- a. The Responsible Manager and CEO, or designee, will be notified 3 months prior to expiration of a contract and advise on need for renewal and changes needed.
- b. Request for Bid or Request for Proposal will be advertised per NBHS procurement policy/procedure.
- c. Example contracts to be sent to interested providers for initial review.
- d. Contract recommendations to be presented to the Board per Board Policies and Bylaws for final review/approval.
- e. Electronic PDF files of executed contracts and supporting documentation will be moved to a file with the year in which the contract expires to allow for ease of file disposal the once the retention period has lapsed. Paper files will be shredded.