

Auditing and Monitoring for Mental Health Authorities in an Ever-Changing Compliance Environment

Presented by:

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Objectives

- Gain tools to assist in maintaining records
- Demonstrate auditing & monitoring process
- Provide guidance regarding policies and procedures

Where does the money come from for the Mental Health Authority?

- Illinois is a state run and directed mental health system
- Counties and townships can voluntarily organize local mental health authorities through referendums
- McHenry County passed a property tax referendum for this purpose
- May have contracts with the state and federal government

Overview of a Mental Health Authority's Funding Challenges

- Must have an understanding of Federal Guidelines
- Knowledge and understanding of State Regulations & Guidelines
- Knowledge that the State & Federal Guidelines may not be consistent
- Understanding Coordination of Benefits
- Knowledge of how providers are funded to avoid ANY possibility of duplicate billings to both the Mental Health Authority and the State for services

Overview of a Mental Health Authority's Funding Challenges

- Planning for upcoming changes in the Illinois Medicaid Rule to ensure that future funding does not conflict
- Self disclosures between funded agencies, Mental Health Authority and the State can be cumbersome
 - Sometimes the question becomes “who is responsible for the disclosure”
- Difference in billing formats and differences in electronic health records

How do I avoid losing sleep???

- Development and implementation of policies and procedures that guide both internal & external auditing and monitoring functions
- I have a direct line of support with our Board and the Chairperson of our Compliance & Ethics Committee
- I have the support of our Executive Director
- Our culture is one where compliance is the expectation
- Membership to HCCA keeps me up to date on the latest news in the world of Healthcare Compliance

How do I avoid losing sleep???

- There is a group of compliance professionals within our networks that meet and discuss compliance regulations, brainstorm, collaborate, develop and conduct training
 - Trainings have been developed for: network leadership, Boards, direct care workers and clinicians

How the process begins

- Funding application
- Contract
- Detailed work plan

How do we audit and monitor?

Pre-audit:

- Strong policies and procedures
 - [Record Auditing and Monitoring.pdf](#)
- Defined mechanisms that trigger an audit
 - +/- 16% of the contract base
 - Change in funding type
 - A pattern of billing submission errors
- Process for coordinating audits with funded agencies
- Random file selection
 - 10% of billings or 10 of client records, whichever is less
- [Audit Information Request Form.pdf](#)

How do we audit and monitor?

During the audit:

- Conduct an entrance conference
- Who, what, when, why & how
- To avoid adversarial environment, we use a consultative approach
- Conduct the audit
- Conduct an exit conference explaining our findings

How do we audit and monitor?

Post-audit:

- 45 days to submit report to the agency
- Development of the report, which includes internal discussion of findings
- The formal report ([Link](#)) submitted to the agency may include a requirement that a Plan of Correction must be developed and submitted to the Mental Health Authority
- The agency has 10 days to respond to the report and provide additional documentation if needed

How do we audit and monitor?

Post-audit:

- Duplicate billings
- Extrapolations may occur when the percentage of error is significant
- If there is recoupment the organization may request to appeal

Tracking & Reporting to the Board

- The Tracking Report does not include agency names, each agency has been given an identification number [Audit Tracking Spreadsheet-Master.pdf](#)
 - All Board meetings are public, and covered under FOIA which is why we de-identify the agencies in this public setting.
- Annual reports are provided to the Board via the Compliance & Ethics committee, who may make recommendations to the Board

Tracking & Reporting to the Board

- The Board in the past has set requirements that each agency will be audited within a given time period, usually 1 year
- Reporting to the Board validates the compliance positions
- As a Mental Health Authority we are accountable to the constituents of our county and the tracking reports & regular reporting to the Board demonstrates our commitment to compliance

Lessons Learned

- Be prepared – know the program, the issues etc.
- Take the right team members
- Keep policies and procedures updated
- Educate providers about the process in advance
- Don't take things personally
- Maintain your sense of humor

Mental Health Authority Successes

- Helped agencies improve their internal processes (billing & auditing)
- By identifying duplicate billings and working with the agencies and the State we have mitigated risks for all parties
- Internal audits help us identify areas of improvement and keep us accountable
- There have been significant recoupments in the past which have allowed us to reallocate funds for much needed services

In closing

- Gain tools to assist in maintaining records
 - Tools have been provided to assist in maintaining your records and reporting to your Board
- Demonstrated auditing & monitoring process
 - Shared the McHenry County Mental Health Board's auditing and monitoring process, including challenges and successes
- Provided guidance regarding policies and procedures
 - Provided a sample policy and procedure for your use

Questions....



Contact Information



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