



## First Regional Training A Success

Mary Thornton presented the first regional kick off training on May 11, in Greeley. The program was packed with helpful information designed to increase senior management teams' awareness of the changing and expanding world of corporate compliance.

Mary provided overviews on compliance plans; documentation standards; regulation changes; the enforcement environment; and the risk associated with not being proactive in these areas to ensure the letter of the law is met.

During the presentation, the audience learned how the CCQC is providing review/training for staff on documentation, coding, high risk areas, compliance plans, audits and monitoring tools.

The presentation received high marks from attendees who were appreciative of Mary's energy, expertise of the subject and knowledge of the Colorado system in order to put the presentation in context for our state.

## Audit Protocol Workgroup

Lead: Rob Bremer

The Audit Protocol Workgroup met again on May 24. As stated in the previous newsletter, the objectives of this group are to: develop common claims validation (e.g. the 411 audit); record documentation and provider compliance program audit tools. In addition to these three tools, the workgroup will produce provider audit procedure recommendations for the BHOs.

The goal of this workgroup is to help the BHOs implement efficient auditing procedures that appropriately target our key risk areas. Audit tools are scheduled to be completed by July and could be piloted by the BHOs in the late summer.

## The CCQC Steering Committee

Charlotte Yianakipulos-Veatch, Co-Chair; Robert Brenner, Co-Chair; Mary Thornton, Consultant.

Erica Arnold-Miller	VO/CHP	Robert Bremer	CO Access
Rick Doucet	ACMHC	Julie Kellaway	VO/NBHP
Barb Mettler	SPMHC	Vicki Rodgers	JCMH
Kari Snelson	WCMHC	Teresa Summers	BHI
Mary Thornton	Mary Thornton & Assoc.		
Charlotte Yianakipulos-Veatch	SPMHC		

## High Risk Training

Lead: Julie Kellaway

The High Risk Training Subcommittee is currently finalizing the information to be presented at the Case Management Training.

The Case Management Training will be a day-long event that will occur on June 23, at Community Reach's Northglenn office.

Information on the Case Management Training has been distributed to the mental health centers and behavioral health organizations. The registration link has also been activated.

Next on the subcommittee's agenda will be to take on issues pertaining to service planning.

## Resources

[www.oig.hhs.gov](http://www.oig.hhs.gov)

[www.cms.gov](http://www.cms.gov)

[www.cms.gov/MedicaidIntegrityProgram/](http://www.cms.gov/MedicaidIntegrityProgram/)

[www.cms.gov/medicaidracs/home.aspx](http://www.cms.gov/medicaidracs/home.aspx)

[www.hhs.gov/ocr/privacy/](http://www.hhs.gov/ocr/privacy/)

[www.colorado.gov/cs/Satellite/HCPF/HCPF/1197969485906](http://www.colorado.gov/cs/Satellite/HCPF/HCPF/1197969485906)

George DelGrosso	CBHC
Wendy Kidd	BHI
Barbara Smith	FBHP
Karen Thompson	BHI
Maggie Tilley	VO/CHP

## Compliance Program Development

Lead: Erica Arnold Miller

The Compliance Committee has had two trainings to date. The first training was held on April 14, 2011. The overall goals for Compliance Program Development were represented and discussed, including:

- Document library for compliance materials to be posted on CBHC website (web page in development), including reference materials for the seven elements of a compliance program/plan, training materials and presentations, various sample compliance program descriptions, etc.
- Developing a community of practice through regular statewide compliance meetings—sharing information in a non-competitive way, furthering training, learning and addressing new regulations, support/feedback on compliance issues. It was noted that continuity is important. Charlotte Yianakopoulos-Veatch will talk with Brian at CBHC about using a room there for the meetings. Kari Snelson and A. Brown offered to try and get the permanent committee off the ground.
- Developing a board presentation on compliance.
- Survey to assess compliance needs and planning for future training.
- Baseline Assessments: Mary Thornton presented a plan for conducting an organizational risk assessment, explaining the steps involved. She recommends completing a risk assessment in the next three months. She also stressed the importance of documenting all of it.
- The second training was held on May 24, and covered:
  - A general overview of compliance programs and government expectations. These expectations were then related back to plans submitted by three organizations (San Luis Valley MHC, Spanish Peaks MHC and BHI agreed to submit their plans for this meeting).
  - Other topics identified for future trainings were on FERA (Federal Enforcement and Recovery Act), Affordable Care Act and HiTech.

## Basic Documentation & Training Committee

Lead: Vicki Rogers

The Basic Documentation and Training Committee has been working with Mary Thornton organizing training for a variety of audiences and developing resources that can be sustained into the future about compliance and documentation.

Four regional trainings for senior managers at community mental health centers (CMHC) and behavioral health organizations (BHO) are planned for May and June with Mary Thornton facilitating. The trainings focus on the current

regulatory environment and why now is the time to update staff on documentation standards.

Training the Trainer sessions for two trainers from each MHC and BHO are planned for September.

This training will introduce the documentation guide that is being developed, hints on training, and slides that trainers will be able to retro fit to their center with all of the appropriate information for new and current clinical staff.

The committee is developing a documentation guide that provides:

- Introduction/key concepts for clinical managers and staff about documentation
- Overview of Medicare and Medicaid/implications for documentation
- Understanding compliance audits
- Documentation rules
- Best practice models for clinical documentation compliance

If you have any questions, comments or concerns, please contact:

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 or Kari Snelson:  
[karis@wcmhc.org](mailto:karis@wcmhc.org)