NorthCare Site Review Protocol SUD Provider FY21

Standard I: Customer Services/Enrollee Rights Responsible Contact(s): Kayti Lancour klancour@northcarenetwork.org 906-936-6865 Ref# **Dimension/Indicator** Suggested Evidence to be Submitted for Desk Audit 1.1 **Customer Services** Method **Outcome** of Review (Not all inclusive.) 1.1.1 Corrective Action Plans: Provider has taken Desk 🛛 Met П Site Part Met corrective action in all identified areas of Not Met □ concern/non-compliance on the previous \Box NA NorthCare review. Provider has **current** policy(ies) that address all Desk 🛛 Submit copy of current Customer Service staff person's job description 1.1.2 Met MDHHS Customer Service Standards. (NOTE: At Site □ Part Met Submit copy of all policies related to Customer Service Standards Not Met □ least annually (month/year to month/year) Accessibility and Accommodation policies and procedures/processes are reviewed NA Consumer Grievance and Appeal and if there are approved changes, they are **Cultural Sensitivity** disseminated, communicated and made **Customer Education and Marketing** effective within that time **Enrollee-Recipient Rights** frame. Policy(ies)/procedures are also Limited English Proficiency updated/implemented at time of new or changes to relevant state or federal law, PIHP/provider contract or PIHP policy. 1.1.3 Provide evidence of consumer involvement in Desk 🛛 Provide copy of board membership policy/bilaws Met program development and/or evaluation Site □ Part Met □ Meeting minutes of local Consumer Advisory groups where consumer Not Met □ involvement and input are evident. Provider consolidated satisfaction survey data. NA The provider conveys an atmosphere that is Submit Policy/Procedure Desk 🛛 1.1.4 Met Site □ welcoming, recovery based, and trauma Client survey Part Met □ informed. Not Met □ NA 1.1.5 Written material must be available in Desk 🛛 Met Submit evidence of agency plan to obtain alternative formats of written alternative formats and in an appropriate Site □ Part Met material when/if requested. Not Met manner that takes into consideration the special NA

	needs of those who, for example, are visually impaired or have limited reading proficiency.			
I.1.6	General Information for All Enrollees: Required information is in the NorthCare Customer Handbook. Providers are required to distribute at start of service and annually thereafter.	Desk Site	Met	NorthCare will review that most up to date SUD Certification of Eligibility form is being used to ensure that Customer Handbook is being given at time of intake and annually thereafter. Orientation Checklists.
1.1.7	Consumers are educated on choice of providers and provider information that they have a right to request such as a list of providers.	Desk Site	Met Part Met Not Met NA	Intake checklist Submit Policy/Procedure
I.1.8	Annual reports, organizational chart, board member list, meeting schedule and minutes and that they can request a paper copy and where to find them on the website. (If subject to FOIA)	Desk Site	Met Part Met Not Met NA	Customer Service staff should know where to locate these resources when asked, if applicable. NorthCare will review website for updated information. If noted in board member handbook and reviewed at election time
1.1.9	Orientation packet given out at first assessment appointment.	Desk Site	Met Part Met Not Met NA	Submit copy of consumer orientation/intake packet
1.1.10	Charitable Choice Notice	Desk Site	 Met	Submit copy of Notice (if applicable – pertains to faith-based providers only)
1.2	Grievance			
1.2.1	Process for Handling Grievances and Disposition Notices Customer Services or the Recipient Rights Office performs the following functions: Provides a written disposition within 90 calendar days of the Provider receipt of the grievance to the customer, guardian, or parent of a minor child. The content of the notice of disposition includes:	Desk Site	Met Part Met Not Met NA	Provide Grievance procedure/policy. Provide Evidence of staff training on Grievances. Case management job description
	The results of the grievance process;		ĺ	

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	The date the grievance process was conducted;				
	The beneficiary's right to request a fair hearing if the notice is more than 90 calendar days from the date of the request				
	for a grievance; and				
	How to access the fair hearing process. (1)				
	Please provide sample resolution letters.				
	2. Notice of Disposition (Grievance)				
	The notice of disposition includes an				
	explanation of the results of the resolution				
	and the date it was completed. (2)				
	Provider ensures all required elements are				
	included in appeal letters.				
1.2.2	Process for tracking and resolving Grievances.	Desk		Met 🗆	Provide list of Grievances received within the last year and process for
		Site	Ш	Part Met	how they are tracked.
				Not Met □ NA □	
1.3	Enrollee Rights and Protections			INA 🗆	
1.3.1	a) The provider ensures that enrollees have	Desk	\boxtimes	Met 🗆	Highlight where this information is covered in pertinent policies.
	the right to receive information materials	Site		Part Met	List any documents you may have in Non-English languages.
	&instructional materials relating to them in			Not Met □	Submit any additional enrollee rights materials provided to enrollees
	a manner and format that may be easily			NA 🗆	addressing this information.
	understood. Informative materials				Ability to use the language line through NorthCare Network
	intended to be distributed through written				
	or other media to beneficiaries or the				
	broader community that describe the				
	availability of covered services and supports				
	and how to access are written at the 4 th				
	grade reading level when possible.				
	b) The provider makes its written information				
	available in the prevalent, non-English languages in its service area.				
	c) Provider makes oral interpretation services				
	·				
	non-English languages.				
	available free of charge to individuals for all				
L	Hori English languages.	1		1	

1.3.2	 d) Provider notifies its enrollees that written information is available in prevalent languages. e) Written material must be available in alternative formats in an appropriate manner that takes into consideration the special needs of those who, for example, are visually impaired or have limited reading proficiency. General Information for All Enrollees. 	Desk	×	Met □	Submit any additional enrollee rights materials provided to enrollees
1.3.2	Information is made available to enrollees within a reasonable time after enrollment including:	Site		Part Met Not Met NA	with this information. • Enrollee's Right to be treated w/ Dignity and Respect • Right to receive treatment options. • Provided -Enrollee Communication • Service not covered or Moral/Religious Basis • Right to participate in decisions regarding care • Free of Restraint/Seclusion • Right to Request and obtain information • Grievance/Fair Hearing and Appeal Rights (Orientation Checklist) Any restrictions on the enrollee's freedom of choice among network providers.
1.3.3	Recipient Rights Poster – Must be readily visible and include phone number and rights advisor (match current advisor)	Desk Site		Met Part Met Not Met NA	Submit picture of poster
1.3.4	Written Notice of Significant Change. The Provider gives each enrollee written notice of any significant change, as defined by the State, in any of the general information (3 a – I), including change in its provider network (e.g., addition of new providers and planned termination of existing providers).	Desk Site		Met Part Met Not Met NA	Submit policies with information highlighted pertinent to this standard or samples of staff training that has occurred to ensure they are aware of this standard, and it is being met. Could also submit sample written Notice of Significant Change letters that are or would be used when needed.

Results – Standard I Customer Services/Enrollee Rights									
Met	II		Χ	1.0	=				
Partially Met	=		Х	.50	=				
Not Met	=		Χ	.00	=				
Not Applicable	=								
Total Applicable = Total Score =									
Tot	al Sc	ore ÷ Tot	al Appl	icable	=				

Standard IV: Data Integrity

Responsible Contact(s): Joan Wallner jwallner@northcarenetwork.org 906-936-6867

Ref#	Dimension/Indicator			
IV.1	Data Integrity	Method	Outcome	Suggested Evidence to be Submitted for Desk Audit
		of Review		(Not all inclusive.)
IV.1.1	Corrective Action Plans: Provider has taken	Desk 🛚	Met □	
	corrective action in all identified areas of	Site □	Part Met □	
	concern/non-compliance on the previous		Not Met □	
	NorthCare review.		NA 🗆	
IV.1.2	Provider has current policy(ies) that address	Desk 🛛	Met □	Submit policies and procedures that support meeting MDHHS
	data quality standards/requirements. NOTE :	Site □	Part Met □	Contract Attachment, Encounter and Teds Reporting Requirements,
	At least annually (month/year to month/year),		Not Met □	Primary Insurance Verification Supporting Medicaid as the Payer of
	policies and procedures/processes are		NA 🗆	Last Resort, etc. As identified in the NorthCare Network Data Quality
	reviewed and if there are approved changes,			Management Policy.
	they are disseminated, communicated, and			
	made effective within that time			
	frame. Policy(ies)/procedures are also			
	updated/implemented at time of new or			
	changes to relevant state or federal law,			
	PIHP/provider contract or PIHP policy.			
IV.1.3	Provider assures a Deductible policy is setup	Desk 🛚	Met □	Submit policy or procedure followed to meet this standard.
	as an insurance and kept current for	Site □	Part Met	
	individuals with a Medicaid spend down.		Not Met □	
			NA 🗆	
IV.1.4	Providers demonstrate the management of	Desk 🛚	Met 🗆	Submit policy or procedure followed to meet this standard.
	Medicaid eligibility to ensure individuals have	Site □	Part Met 🗆	Demonstrate evidence of use (follow up and tracking documents)
	no lapse in coverage.		Not Met	Procedure for monthly monitoring of eligibility during the
			NA 🗆	authorization period
IV.1.5	SUD provider monitors changes to Block Grant	Desk 🛛	Met 🗆	Submit policy or procedure followed to meet this standard.
	eligibility	Site □	Part Met	Demonstrate evidence of financial tracking / calculation sheets.
			Not Met □	
			NA 🗆	
IV.1.6	Provider demonstrates that all Direct third-	Desk 🛛	Met 🗆	Submit policy or procedure for Financial Liability (ATP) and Third-
	party billing is identified and pursued. All	Site □	Part Met	Party Billing Insurance Maintenance.
	claims are expedited for payment on a regular		Not Met □	

	basis to ensure that Medicaid is the payer of		NA 🗆	
	last resort.			
IV.1.7	BH-TEDS record errors are addressed and	Desk 🛛	Met □	Submit policy or procedure used to address and fix errors. Submit
	fixed monthly prior to file submission.	Site □	Part Met	any relevant supporting documentation and follow-up tracking
			Not Met □	documents.
			NA 🗆	

Results – Standard IV. Data Integrity									
Met	"		Х	1.0	=				
Partially Met	=		Χ	.50	=				
Not Met	=		Χ	.00	=				
Not Applicable	=								
Total Applicable = Total Score =									
Total Score ÷ Total Applicable =									

Standard V: Information Security Systems

Responsible Contact(s): Andrew Kulie akulie@northcarenetwork org 906-205-2989

Ref #	onsible Contact(s): Andrew Kulie <u>akulie@</u> Dimension/Indicator	-11010	cur c	-110044	<u> </u>	300 203 2303
V	Information Systems	_	thod	Outo	ome	Suggested Evidence to be Submitted for Desk Audit (Not all inclusive.)
V.1	Corrective Action Plans: Provider has taken corrective action in all identified areas of concern/non-compliance on the previous NorthCare review.	Desk Site		Met Part M Not M NA		
V.2	Provider has current policy(ies) that address all Information Security standards/requirements. NOTE : At least annually (month/year to month/year), policies and procedures/processes are reviewed and if there are approved changes, they are disseminated, communicated and made effective within that time frame. Policy(ies)/procedures are also updated/implemented at time of new or changes to relevant state or federal law, PIHP/provider contract or PIHP policy.	Desk Site		Met Part M Not M NA		
V.3	Provider has documented process for managing and auditing user accounts for all applications that contain PHI (e.g., ELMER, CAFAS.)	Desk Site		Met Part M Not M NA		Submit Policy or Procedure followed to meet standard
V.4	Provider complies with HIPAA security risk assessment requirements.	Desk Site		Met Part M Not M NA	□ let □	Submit most recent HIPAA Security Risk Analysis and work plan to address high risk areas. If contractors are given access to NorthCare systems with PHI, provide names of the systems, purpose, forms, policies and procedures used to manage contractor access to these systems.
V.5	Provider has policy/procedure for securing mobile computing device	Desk Site		Met Part M Not M NA		Provide Policy & Procedures including details of how your devices are secure from having HIPAA violation.

Results – Standard V. Information Security Systems									
Met	II		Х	1.0	=				
Partially Met	II		Х	.50	=				
Not Met	П		Х	.00	=				
Not Applicable	=								
Total Applicable = Total Score =									
Tot	al Sc	ore ÷ Tot	al Appl	icable	=				

Standard VI: Financial Management Responsible Contact(s) – Megan Rooney mrooney@northcarenetwork.org 906-936-6845 **Dimension/Indicator** Ref# VI.1 Method Suggested Evidence to be Submitted for Desk Audit **Audits** Outcome of Review (Not all inclusive.) VI.1.1 Corrective Action Plans: Provider has taken Desk 🛛 Met corrective action in all identified areas of Site □ Part Met concern/non-compliance on the previous Not Met □ NorthCare review. NA Provider has current policy(ies) that address all VI.1.2 Desk 🛛 Met П financial management standards/requirements. Site □ Part Met □ NOTE: At least annually (month/year to Not Met □ month/year), policies and procedures/processes NΑ are reviewed and if there are approved changes, they are disseminated, communicated and made effective within that time frame. Policy(ies)/procedures are also updated/implemented at time of new or changes to relevant state or federal law, PIHP/provider contract or PIHP policy. Providers Financial Audit has been performed, Submit a copy of the Financial Audit. If a financial audit has not been VI.1.3 Desk 🛛 Met as required by MDHHS contract. Site □ Part Met □ conducted for the review year, submit relevant tax return for the If there are audit findings, please provide POC. Not Met □ organization. NΑ Audit findings: provide management response & updates to action plans. Providers Financial Reporting to Board of Submit a copy of financial packet presented to Board of Directors. Desk 🛛 VI.1.4 Met Site □ Within current fiscal year Directors Part Met □ Procedure on how disbursed in organization Not Met □

NA

Results – Standard VI Financial Management									
Met	II		Χ	1.0	=				
Partially Met	II		Χ	.50	=				
Not Met	II		Χ	.00	=				
Not Applicable	=								
Total Applicable = Total Score =									
Tot	al Sc	ore ÷ Tot	al Appl	icable	=				

Standard VII: General Management Responsible Contact(s): Judi Brugman jbrugman@northcarenetwork.org 906-936-6844 Ref# **Dimension/Indicator** VII.1 **Administrative Efficiencies** Suggested Evidence to be Submitted for Desk Audit Method Outcome of Review (Not all inclusive.) VII.1.1 Corrective Action Plans: Provider has taken Desk 🛛 Met corrective action in all identified areas of Site □ Part Met □ concern/non-compliance on the previous Not Met □ NorthCare review. NA Timely submission of desk audit material All desk audit material must be uploaded to SharePoint by end of VII.1.2 Desk 🛛 Met Site business day, 5:00 pm, Friday September 3, 2021 Part Met □ Not Met □ NA П VII.2 Leadership and Oversight The organization's Medical Director is involved Submit current Medical Directors Job Description. VII.2.1 Desk 🖾 Met Part Met Site □ Evidence of oversight activities (meeting minutes, review of in the review of clinical practices Not Met □ policies/procedures. policy/procedure, etc.) NΑ Provider coordinates and collaborates with Desk 🛛 Met Submit updated collaborative agreement spreadsheet. VII.2.3 Site □ Part Met □ A sample of Meeting Minutes will be selected for review on-site. other required local human services agencies. Not Met □ NΑ Network Policy Development, Maintenance and Communication VII.3 Provider has a process in place to ensure Submit documented process and evidence. VII.3.1 Desk 🛛 Met Part Met □ common policies/procedures are developed/ Site □ updated within reasonable time of applicable Not Met □ NA NorthCare/State/Federal changes. Examples: policy spreadsheet, table of contents for policies VII.3.2 Desk 🛛 Met Provider maintains the ability to produce a master list of all such policies and procedures. Part Met □ Site □ Not Met □ NA The following information is included on the Examples: policy spreadsheet, table of contents for policies VII.3.3 Desk 🖾 Met master list or on all written p/p: effective date Site □ Part Met □ as, review dates, including the date of the Not Met □

NA

most recent revision and identification of

approval authority.

VII.3.4	Provider has process to track policy changes.	Desk Site	Part Met Not Met	Examples: policy spreadsheet, table of contents for policies
VII.3.5	At least annually (month/year to month/year) policies and procedures/processes are reviewed and if there are approved changes, they are disseminated, communicated and made effective within that time frame. Policy(ies)/procedures are also	Desk Site	Met Part Met Not Met	Submit policy/procedure for policy review. Submit spreadsheet, etc. Dates on policies submitted for desk audit will be reviewed.
	updated/implemented at time of new or changes to relevant state or federal law, PIHP/provider contract or PIHP policy.			
VII.3.6	Provider ensures staff know and have access to written policy/procedure appropriate to their jobs.	Desk Site	Part Met Not Met	Submit Orientation process for employees on how they know what policy/procedures are appropriate to their job Submit procedure on how you update staff
VII.3.7	Record Retention: The Provider shall assure that all terms of the agreement will be appropriately adhere to and that records and detailed documentation for the project or program identified in this agreement will be maintained for a period of not less than 10 years from the date of termination, the date of submission of the final expenditure report or until litigation and audit findings have been resolved and shall be readily available at any reasonable time for examination of audit by personnel authorized by the PIHP, MDCH, or law. Records for non- expendable property shall be retained for three (3) years.	Desk Site	Part Met Not Met	Submit retention policy
VII.3.8	MAT-inclusive Practices: Provider shall demonstrate adherence to best practice programming including MAT.	Desk Site	Part Met Not Met	Submit policies
VII.3.9	Confidentiality: The Provider agrees to maintain the confidentiality of information regarding consumers in compliance with 42	Desk Site		Submit policies

	CFR, Part 2 "Confidentiality of Alcohol and			NA	
	Drug Abuse Patient Records", HIPAA Privacy				
	Laws, NorthCare Network Contract and				
	applicable Policies and Procedures.				
VII.3.10	Communicable Disease Procedure to assure:	Desk	\boxtimes	Met	Submit policy/procedure
	Clients identified to have high-risk behaviors	Site		Part Met	At time of new admission
	receive information on available resources and			Not Met	
	referral to testing and treatment			NA	

Results – Standard VII General Management										
Met	II		Χ	1.0	=					
Partially Met	II		Χ	.50	=					
Not Met	=		Χ	.00	=					
Not Applicable	=									
Total Applicable	=									
Tot	Total Applicable = Total Score Total Score ÷ Total Applicable									

Standard VIII: Quality Management

Responsible Contact(s): Diane Bennett dbennett@northcarenetwork.org 906-936-6843

Ref#	Dimension/Indicator					
VIII.1	Quality Assessment and Performance	Met	thod	Outcome	е	Suggested Evidence to be Submitted for Desk Audit
	Improvement Program (QAPIP)	of Re	eview			(Not all inclusive.)
VIII.1.1	Corrective Action Plans: Provider has taken	Desk	×	Met 🗆]	
	corrective action in all identified areas of	Site		Part Met	┒│	
	concern/non-compliance on the previous			Not Met	┚┃	
	NorthCare review.			NA [
VIII.1.2	Provider has current policy(ies) that address all	Desk		Met [
	Quality Management standards/requirements.	Site		Part Met	┚┃	
	NOTE: At least annually (month/year to			Not Met	┚┃	
	month/year) policies and procedures/processes			NA [
	are reviewed and if there are approved					
	changes, they are disseminated,					
	communicated, and made effective within that					
	time frame. Policy(ies)/procedures are also					
	updated/implemented at time of new or					
	changes to relevant state or federal law,					
	PIHP/provider contract or PIHP policy.			_		
VIII.1.3	Provider's Quality Improvement Program is	Desk				Submit copy of current QAPIP and Board minutes when
	current and reviewed/approved annually by	Site	Ш	Part Met		reviewed/approved.
	Board of Directors.			Not Met		
VIII.1.4	Providers demonstrate quality management	Desk	<u> </u>			Submit copy of quality management/improvement policies, procedures,
VIII.1.4	and improvement efforts.	Site		Part Met		processes and two examples of quality improvement
	and improvement errores.	0.00	_	Not Met		initiatives/outcome reports.
						militarives, outcome reports.
VIII.1.5	Provider has a quality management committee	Desk	\boxtimes	Met [Submit Quality Management Committee membership and policy.
	that: is granted authority for QM, provides	Site		Part Met	\supset	
	ongoing reporting to the oversight authority,			Not Met		
	meets at least quarterly, maintains approved			NA [
	records of all meetings, if applicable, includes at					
	least one participating provider or receives					
	input from participating providers, provides					
	guidance to staff on QM priorities and projects,					

	approves QIPs, monitors progress in meeting QI goals.			
VIII.1.6	Provider conducts an annual effectiveness review of the QAPIP and/or Quality Improvement initiatives.	Desk Site	Met Part Met Not Met NA	Submit copy of annual effectiveness review.
VIII.1.7	Provider has documented procedures to select, collect, analyze and ensure data integrity prior to integrating data that is used to manage key work processes.	Desk Site	Met Part Met Not Met NA	Submit policy and examples such as meeting minutes, etc.
VIII.1.8	Provider evaluates consumers' experience with services and responds to suggestions for improvement and/or negative feedback. (30)	Desk Site	Met Part Met Not Met NA	Submit policy/procedure. Submit examples of two suggestions for improvement, how/who reviewed, outcome of review, and follow-up with person making the suggestion, if known, or general communication (i.e., posting for lobby, newsletter, etc.) with desk audit materials.
VIII.2	Consumer Record Documentation Review			
VIII.2.1	Provider conducts review of consumer record documentation at least annually	Desk Site	Met Part Met Not Met NA	 Submit a copy of the following: Documentation Review Protocols/Policy Tool used for each review Summary of findings from last review Review schedule for current year Sample size and selection criteria
VIII.2.2	Provider takes appropriate action regarding review findings.	Desk Site	Met Part Met Not Met NA	Submit evidence of follow-up/corrective action; improvement initiatives because of documentation review findings, etc.
VIII.2.3	Findings from documentation reviews are incorporated into annual performance evaluations for staff.	Desk Site	Met Part Met Not Met NA	Submit evidence of documentation review findings incorporated into annual performance evaluations.
VIII.3	Performance Indicators			
VIII.3.1	Monitoring of performance measures is completed monthly to ensure measures are fully met. (18)	Desk Site	Met Part Met Not Met NA	Submit evidence that it is being monitored monthly. Process on how it is monitored at your organization. Submit policy/procedure and evidence of monthly monitoring.
VIII3.2	PI #2 – SUD Admission within 14 days of request for non-emergent services has been	Desk Site	Met Part Met Not Met	NOTE : To determine compliance, NorthCare reviewed two most recent quarters for PI 2b from the PCE PI Reporting module. NorthCare has set

fully met each quarter of the review period.	NA 🗆	a goal of achieving 90% for indicator PI2b until a new baseline is set by
(18)		MDHHS.

Results – Standard VIII Quality Management										
Met	II		Χ	1.0	ш					
Partially Met	11		Х	.50	=					
Not Met	=		Х	.00	=					
Not Applicable	=									
Total Applicable	=									
Tot	al S	core ÷ Tot	tal Appl	licable	=					

Standard IX: Compliance/Program Integrity

Responsible Contact(s): Diane Bennett dbennett@northcarenetwork.org 906-936-6843

Ref#	Dimension/Indicator					
IX.1	Compliance Program	Method		Out	come	Suggested Evidence to be Submitted for Desk Audit
		of Re	view			(Not all inclusive.)
IX.1.1	Corrective Action Plans: Provider has taken	Desk	×	Met		
	corrective action in all identified areas of	Site		Part N	⁄let □	
	concern/non-compliance on the previous			Not N	1et □	
	NorthCare review.			NA		
IX.1.2	Provider has current policy(ies) that address	Desk	×	Met		
	Program Integrity standards/requirements,	Site		Part N	⁄let □	
	including HIPAA Privacy and Security. NOTE: At			Not N	1et □	
	least annually (month/year to month/year),			NA		
	policies and procedures/processes are					
	reviewed and if there are approved changes,					
	they are disseminated, communicated and					
	made effective within that time					
	frame. Policy(ies)/procedures are also					
	updated/implemented at time of new or					
	changes to relevant state or federal law,					
	PIHP/provider contract or PIHP policy.					
IX.1.3	Provider has operational compliance program.	Desk	\boxtimes	Met		Submit current compliance program document(s).
		Site		Part N	∕let □	
				Not N	1et □	
				NA		
IX.1.4	Provider CEO has appointed a Compliance	Desk		Met		Submit evidence or indicate same as last year.
	Officer/liaison.	Site			∕let □	Submit Compliance Officer job description.
					1et 🗆	
				NA		
IX.1.5	Provider educates staff of compliance program	Desk		Met		Submit applicable policy, procedure, postings, etc.
	and how/who to report suspected violations.	Site	Ш		∕let □	
					1et □	
DV 4.6			<u> </u>	NA]	
IX.1.6	Compliance investigations are initiated and	Desk		Met		Submit applicable policy/procedure.
	completed per policy.	Site			/let □	Submit list of all investigations conducted since October 1 including date
				NOT IV	1et 🗆	of report, date investigation began, date investigation was completed, if

				NA 🗆	it took longer than required # of days to complete why, and if the
					complaint was substantiated or not.
IX.1.7	Provider responds promptly to detected	Desk	\boxtimes	Met □	Submit policy/procedure
	problems and takes corrective action as	Site		Part Met 🛚	
	needed.			Not Met □	
				NA 🗆	
IX.1.8	Provider submits NorthCare Compliance Report	Desk	\boxtimes	Met □	Please submit with desk audit materials, if not already provided.
	Form for each alleged complaint relating to	Site		Part Met 🗆	
	NorthCare's contract/consumers.			Not Met □	
				NA 🗆	
IX.1.9	Provider conducts periodic internal monitoring	Desk		Met □	Submit policy/procedure.
	and auditing.	Site		Part Met 🗆	Submit two examples of internal monitoring/auditing.
				Not Met □	
				NA 🗆	
IX.1.10	Provider ensures staff receive annual	Desk		Met □	Submit training agenda/outline/module.
	compliance training, i.e. DRA, False Claims Act,	Site		Part Met \square	Submit training schedule.
	Whistleblowers Act, Fraud/Waste/Abuse, Code			Not Met □	Submit Compliance Training Plan.
	of Conduct, HIPAA Privacy, and HIPAA Security.			NA 🗆	Submit evidence of annual compliance training completion.
IX.1.11	Provider ensures Board of Directors receive	Desk	\boxtimes	Met □	Submit training agenda/outline/module.
	annual compliance training, i.e. DRA, False	Site		Part Met 🗆	Submit training schedule.
	Claims Act, Whistleblowers Act,			Not Met □	Submit Compliance Training Plan.
	Fraud/Waste/Abuse, Code of Conduct and the			NA 🗆	Submit evidence of annual compliance training completion.
	content and operation of the compliance				
	program.				
IX.1.12	Provider has included DRA requirements in	Desk	\boxtimes	Met □	Submit copy of employee handbook. If no employee handbook, submit
	employee handbook and/or policy/procedure.	Site		Part Met 🗆	policy/procedure and evidence of training/review by employees.
				Not Met □	
				NA 🗆	
IX.1.13	Provider is not listed on the	Desk	\boxtimes	Met □	NorthCare will conduct search.
	http://exclusions.oig.hhs.gov as an excluded	Site		Part Met 🗆	
	provider entity.			Not Met □	
				NA 🗆	
IX.1.14	Provider is not listed on the www.sam.org as	Desk	\boxtimes	Met □	NorthCare will conduct search.
	an excluded provider entity.	Site		Part Met 🗆	
				Not Met □	
				NA 🗆	

IX.1.15	Provider has submitted current Disclosure of	Desk 🛛	Met		Last submission dated:
	Ownership, Controlling Interest and Criminal	Site □	Part Me	t 🗆	
	Conviction Form or Attestation.		Not Met	t 🗆	
			NA		

Results – Standard IX Compliance/Program Integrity									
Met	=		Х	1.0	=				
Partially Met	=		Х	.50	=				
Not Met	=		Х	.00	=				
Not Applicable	=								
Total Applicable	=								
Tot	al Sc	ore ÷ Tot	al Appl	icable	=				

Standard X: Provider Network Management Primary Contact(s) – Karena Grasso kgrasso@northcarenetwork.org 906-205-2838 **Dimension/Indicator** Ref# Network Development and Provider Selection X.1 Method Suggested Evidence to be Submitted for Desk Audit Outcome of Review (Not all inclusive.) Corrective Action Plans: Provider has taken X.1.1 Desk 🛛 Met corrective action in all identified areas of Site Part Met □ concern/non-compliance on the previous Not Met □ NorthCare review. NA X.1.2 Provider has **current** policy(ies) that address Desk 🛛 Met all Network Management standards/ Site □ Part Met □ requirements. **NOTE**: At least annually Not Met □ (month/year to month/year) policies and П NA procedures/processes are reviewed and if there are approved changes, they are disseminated, communicated and made effective within that time frame. Policy(ies)/procedures are also updated/implemented at time of new or changes to relevant state or federal law, PIHP/provider contract or PIHP policy. Submit policy/procedure, communication program, meeting minutes, X.1.4 Provider implements a participating provider Desk 🛛 Met relations program to include: orientation of Site □ Part Met □ etc. new providers, updates of network activities, Not Met □ NA provider dispute resolution mechanisms, mechanisms for the availability and distribution of current provider manual (or other docs describing the relationship b/t the organization and participating providers), mechanisms to receive suggestions and guidance from participating providers. Current accreditation body Submit evidence of current accreditation including report. Desk 🛛 Met X.1.5 Site Part Met Not Met □

NA

X.1.6	Excluded party checks relating to health care issues are completed at http://exclusions.oig.hhs.gov monthly for:			Submit policy/procedures Submit evidence of monthly checks on organizations/entities under contract; Submit evidence of monthly checks completed on staff employed by organization/entity under contract; Monthly checks for provider's staff will be reviewed via NorthCare HR review.
X.1.6a	Organization staff	Desk Site	Met Part Met Not Met NA	Teview.
X.1.6b	 monthly for persons with a direct or indirect ownership or control interest of 5% or more, board members, managing employees, administrator, director or business manager. 	Desk Site	Met Part Met Not Met NA	
X.1.7	Excluded Parties List relating to procurement issues are completed at: https://www.sam.gov for:			Submit policy/procedures Submit evidence of checks on organizations/entities under contract; Submit evidence of checks completed on staff employed by organization/entity under contract; Checks for provider's staff will be reviewed via NorthCare HR review.
X.1.7a	Organization staff	Desk Site	Met Part Met Not Met NA	
X.1.7b	 for persons with a direct or indirect ownership or control interest of 5% or more, board members, managing employees, administrator, director or business manager. 	Desk Site	Met Part Met Not Met NA	
X.2	Provider Directory			
X.2.1	Consumers are educated on choice of providers and provider information that they have a right to request such as a list of providers.	Desk Site	Met Part Met Not Met NA	Submit policy and/or procedure

ſ	X.2.2	The paper provider directory must be updated	Desk 🛛	Met □	NorthCare will look for updated provider directory on websites. Submit
		at least monthly and electronic provider	Site □	Part Met \square	policy that indicates how provider directory is maintained and
		directories must be updated no later than 30		Not Met □	disseminated.
		calendar days after SUD provider received		NA 🗆	
		updated provider information.			

Results – Standard X Provider Network Management										
Met	11		Х	1.0	=					
Partially Met	=		Χ	.50	=					
Not Met	=		Χ	.00	=					
Not Applicable	=									
Total Applicable	=									
Tot	Total Applicable = Total Score Total Score ÷ Total Applicable									

Standard XII. Human Resources, Credentialing, and Training Responsible Contacts: Karona Grasso kgrasso@porthearenety

	onsible Contacts: Karena Grasso kgrasso(<u>wnorthc</u>	<u>arenetwori</u>	k.org	906-205-2838
Ref #	Dimension/Indicator	1			
XII	HR/Credentialing/Training	Method		me	Suggested Evidence to be Submitted for Desk Audit
		of Revie			(Not all inclusive.)
XII.1	Corrective Action Plans: Provider has taken	Desk 🛚			
	corrective action in all identified areas of	Site □	Part Met		
	concern/non-compliance on the previous		Not Met		
	NorthCare review.				
XII.2	Provider has current policy(ies) that address all	Desk ⊠			Submit HR policies for employment application standards &
	HR, Credentialing, and Training. NOTE : At least	Site □	Part Met		Background Check Policy; performance evaluations; Training
	annually (month/year to month/year policies		Not Met		policy(ies)
	and procedures/processes are reviewed and if		NA		
	there are approved changes, they are				
	disseminated, communicated and made				
	effective within that time				
	frame. Policy(ies)/procedures are also				
	updated/implemented at time of new or				
	changes to relevant state or federal law,				
	PIHP/provider contract or PIHP policy.				
XII.3	Review of HR files include all standards listed on	Desk 🛛			Submit a list of all personnel to include name, job classification/job
	HR worksheet. Reviewed for all files selected.	Site	Part Met		title, credentials if applicable and hire date.
			Not Met		
XII.4	Credentialing files reviewed are in compliance	Desk 🗵			Credentialing file selection will be chosen from the personal list
	with credentialing policy and procedures.	Site	Part Met		submitted XII.3
			Not Met		
XII.5	Provider is responsible for maintaining	Desk 🛛			Documentation for training of credentialing staff and committee on
ΛII.5	confidential credentialing records and training	Site	Part Met		confidentiality of credentialing material.
	the credentialing staff on the security and	Jile 🗆	Not Met		Submit evidence of training on maintaining confidential credentialing
	privacy measures enacted to protect the				files. Onsite demonstration of the security and confidentiality of
	records.			_	credentialing files.
XII.6	Provider follows a documented process to	Desk ⊠	Met		Gederidaling mes.
ΛΙΙ.Ό	ensure non-credential staff meet criteria set in	Site	Part Met		
	the Michigan Medicaid Provider Manual.		Not Met		
	the Michigan Medicala Frovider Manual.		INOU INIEC		

				NA	
XII.7	Provider staff reviewed are current with	Desk	\boxtimes	Met	Evidence of the required SUD trainings is found in the personnel file.
	required trainings per policy.	Site		Part Met	
				Not Met	
				NA	
XII.8	Provider staff reviewed have received	Desk	\boxtimes	Met	Submit agency supervision policy
	supervision appropriate to SUD	Site		Part Met	Evidence of staff supervision. Examples: Clinical staff supervision
	Credentialing/Certification requirements.			Not Met	meeting minutes, Women's Specialty Services staff supervision
				NA	consultation notes, Peer Recovery plan reviews.

Results – Standard XII HR/Credentialing/Training									
Met	П		Χ	1.0	П				
Partially Met	П		Χ	.50	П				
Not Met	=		Χ	.00	=				
Not Applicable	II								
Total Applicable	otal Applicable = Total Score								
Tot	Total Score ÷ Total Applicable =								

Standard XIII Clinical Practices: Responsible Contact: Tami LeBlanc tleblanc@northcarenetwork.org 906-936-6847 Ref# **Dimension/Indicator Clinical Practice Guidelines** Method **Suggested Evidence to be Submitted for Desk Audit** Outcome of Review (Not all inclusive.) Submit policy/procedure used to identify high risk population and XIII.1 Priority population are served in accordance with Desk 🛛 Met Site □ Part Met priority admission protocol. (this is provided in the handbooks and the current contract. Not Met □ at intake) NA Submit policy/procedure XIII1.2 Provider has policy/procedure for discharging Desk 🛛 Met clients with program non-compliance Site □ Part Met Orientation packet including the guidelines for discharges related to Not Met □ program non-compliance. NA XIII.1.3 Clinical Chart Review Met Will be scored separately for each organization by licensed site and Desk ⊠ Part Met Site □ scores will be provided Not Met □ \boxtimes NA

Results – Standard XIII Clinical Practices								
Met	II		Χ	1.0	=			
Partially Met	II		Χ	.50	=			
Not Met	11		Χ	.00	=			
Not Applicable	=							
Total Applicable	=		Total	Score	=			
Tot	al Sc	ore ÷ Tot	al Appl	icable	=			

XIV.1	7.1 Health and Safety Standards								
XIV.1.1	Providers are responsible for timely reporting of incidents where harm or potential harm for a consumer (who meets MDHHS definition for population to be reviewed) has occurred.	Desk Site		Met Part Met Not Met NA					
XIV.1.2	Incident reports-individual and trend reports reviewed include critical events and sentinel events.	Desk Site		Met Part Met Not Met NA	Submit policy/procedure for clinical review of incidents for trends related to an individual consumer and risk events.				
XIV.1.3	Incident reporting policy requires Root Cause Analyses (RCA) commence within two business days of the determination of a sentinel event.	Desk Site		Met Part Met Not Met NA	Submit policy addressing sentinel events. NorthCare will review at least 2 RCAs in IR Module				
XIV.1.4	RCAs involve persons with appropriate credentials to review scope of care, e.g., SEs that involve consumer death or other serious medical conditions, must involve a physician or nurse.	Desk Site		Met Part Met Not Met NA	Submit policy/procedure. On-site: NorthCare will review incident log maintained at site for comparison to submitted Incident reports to NorthCare.				
XIV.1.5	TB Screens: Conducted per NC Network SUD Provider manual and MDHHS Prevention Policy #2 – residential SUD facilities	Desk Site		Met Part Met Not Met NA	Submit policy/procedure				
XIV.1.6	Medication Review Process: Procedures/process at Residential facility	Desk Site		Met Part Met Not Met NA	Submit medication policy/procedure On site: Verify medications are maintained in secure location. Review medication activity log.				

Results – Standard XIV Health and Safety									
Met	=		Χ	1.0	=				
Partially Met	=		Х	.50	=				
Not Met	=		Х	.00	=				
Not Applicable	=								
Total Applicable	II		11						
Tot	Total Score ÷ Total Applicable =								

Scoring Summary – FY21

	Standard	Total	Total					Total	Repeat
		Elements	Applicable		Number o	of Elements		Compliance	Citations
			Elements	M	PM	NM	NA	Score	
I	Customer Services/Enrollee	16							
	Rights								
IV	Data Integrity	7							
٧	Information Security Systems	5							
VI	Financial Management	4							
VII	General Management	14							
VIII	Quality Management	13							
IX	Compliance/Program	15							
	Integrity								
Χ	Provider Network	10							
	Management								
XII	HR/Credentialing/Training	8							
XIII	Clinical Practices	3							
XIV	Health and Safety	6							
	Overall	101							

 $\textbf{M} \texttt{=} \textbf{Met}, \, \textbf{PM} \texttt{-} \textbf{Partially Met}, \, \textbf{NM} \texttt{=} \textbf{Not Met}, \, \textbf{NA} \texttt{=} \textbf{Not Applicable}$

Total Elements: The total number of elements in each standard.

Total Applicable Elements: The total number of elements within each standard minus any elements that received a score of NA.

Total Compliance Score: The overall percentages are calculated by adding the number of elements that receive a score of Met to the weighted (multiplied by 0.50) number of elements that receive a score of Partially Met, then dividing this total by the total number of applicable elements.

NorthCare Network Contact person by Standard

	Standard	NorthCare Contact	Contact email address	Contact phone number
1	Customer Services/Enrollee Rights	Kayti Lancour	klancour@northcarenetwork.org	906-936-6865
IV	Data Integrity	Joan Wallner	jwallner@northcarenetwork.org	906-936-6867
V	Information Security Systems	Andy Kulie	akulie@northcarenetwork.org	906-205-2989
VI	Financial Management	Megan Rooney	mrooney@northcarenetwork.org	906-936-6845
VII	General Management	Judi Brugman	jbrugman@northcarenetwork.org	906-936-6844
VIII	Quality Management	Diane Bennett	dbennett@northcarenetwork.org	906-936-6843
IX	Compliance/Program Integrity	Diane Bennett	dbennett@northcarenetwork.org	906-936-6843
Х	Provider Network Management	Karena Grasso	kgrasso@northcarenetwork.org	906-205-2838
XII	HR/Credentialing/Training	Karena Grasso	kgrasso@northcarenetwork.org	906-205-2838
XIII	Clinical Practices	Tami LeBlanc	tleblanc@northcarenetwork.org	906-936-6847
XIV	Health and Safety	Tami LeBlanc	tleblanc@northcarenetwork.org	906-936-6847

SUD Contact person by Standard

	Standard	SUD Contact	Contact email address	Contact phone number
I	Customer Services/Enrollee Rights			
IV	Data Integrity			
V	Information Security Systems			
VI	Financial Management			
VII	General Management			
VIII	Quality Management			
IX	Compliance/Program Integrity			
X	Provider Network Management			
XII	Human Resources, Credentialing/Training			
XIII	Clinical Practices			
XIV	Health and Safety			

NorthCare Chart Review Protocol FY21

12.00	Clinical Protocols					
		Initia	ls	мсоі	D	SITE Location
		Date	of Ad	lmission		Discharge Date
		Date	of La	st Service_		
12.01	Bio-Psych-Social Assessment is completed,	Desk		Met		must include:
	signed, and dated by appropriately	Site		Part Met		admitting ASAM Dimensions
	credentialed clinician.			Not Met		presenting problems
				NA		family history,
	(For FY22: Initial Assessments completed after					legal history,
	10/1/21 must use the ASAM Continuum					education,
	Assessment tool and must be completed/and					employment,
	or reviewed and "signed off" by appropriately					mental health screening
	licensed clinician).					
12.02	Documentation that Recovery Planning begins	Desk		Met		
	at admission and continues throughout	Site		Part Met		
	episode of care.			Not Met		
12.03	Treatment Planning:	Desk				Tied to patients identified needs?
	Goals: in the client's own words, goals based	Site		Part Met		Individualized to patient?
	on needs the client identified in the			Not Met		Measurable?
	assessment, and evidence the client was in			NA		Achievable?
	attendance when the plan was developed.					Realistic?
	Objectives: support the goal. (Includes steps					Identified timeframes include start, estimated end, and actual end
	necessary for the client to achieve the goa).					date
	(Treatment Advisory #6)					

12.04	Treatment Plan signatures: Treatment plan signed and dated by client and clinician.	Desk □ Site □	Met Part Met Not Met NA	If not, reason why must be documented.
12.05	Treatment Plan review: Reviews must be	Desk □	Met 🗆	Is Review signed and dated by clinician?
	documented in the case file (per provider	Site 🗆	Part Met	Signed/dated by client?
	manual).		Not Met □	Reviewed and signed/dated by supervisor or others involved in
			NA 🗆	treatment plan/care? If not signed/dated, reason why is documented.
12.06	The services that are requested are identified	Desk 🗆	Met □	
	in the treatment plan.	Site □	Part Met	
			Not Met	
			NA 🗆	
12.07	Documentation: All services accompanied by	Desk 🗆	Met □	
	appropriate progress note	Site □	Part Met \square	
			Not Met □	
			NA 🗆	
12.08	Progress Notes: Reflect individualized	Desk 🗆	Met □	
	treatment and are tied to goal (specify	Site □	Part Met 🛚	
	goal/objective being addressed).		Not Met □	
			NA 🗆	
12.09	Progress notes: Must document begin and end	Desk 🗆	Met 🗆	
	time	Site □	Part Met	
			Not Met	
			NA 🗆	
12.10	Mental Health Screening form(s) are	Desk 🗆	Met □	
	completed and	Site □	Part Met 🛚	
	and in chart.		Not Met □	
			NA 🗆	

13.00	Discharges (Outpatient and Residential)			
13.01	Discharge Planning: Documentation that discharge planning began at admission and continues(d) through episode of care.	Desk ☐ Site ☐	Met Part Met Not Met NA	
13.02	ASAM at Discharge: Client's treatment status and condition at discharge (compare to discharge plan for appropriate aftercare placement and referral) (NA if left AMA and clinician is unable to complete).	Desk ☐ Site ☐	Met Part Met Not Met NA	If not able to complete, reason why must be documented.
13.03	Discharge Summary: Formal summary completed and in client file within 1 week of discharge. Licensing rule	Desk □ Site □	Met Part Met Not Met NA	Formal summary should describe what happened; e.g. if consumer dropped out of service, this should be reflected in the reason for discharge. Summary should also include after care appointments.
13.04	Discharge Date: matches last date of service. BH Teds	Desk ☐ Site ☐	Met Part Met Not Met NA	
13.05	Aftercare- Residential : Documentation that provider assisted consumer in choosing	Desk ☐ Site ☐	Met Part Met Not Met	Client discharge must include after-care appointment with a SUD provider and if not, reason why must be documented.

	appropriate provider for aftercare or next appropriate level of care appointment		NA 🗆	
13.06	Adverse Benefit Determination notice is in chart for early termination of services. Outreach attempts are documented in chart prior to case closure (for outpatient clients who have been unresponsive or non-participatory in treatment).	Desk ☐ Site ☐	Met Part Met Not Met NA	
14.00	W&F Clinical Protocols			
14.01	Women's Specialty Assessment completed prior to HD service	Desk ☐ Site ☐	Met Part Met Not Met NA	W&F Assessment date
14.02	Women's Referral Checklist is complete	Desk ☐ Site ☐	Met Part Met Not Met NA	
14.03	Women's Referral Documented: For each identified need?	Desk ☐ Site ☐	Met Part Met Not Met NA	
14.04	Referral Checklist for each child is complete.	Desk ☐ Site ☐	Met Part Met Not Met NA	

14.05	Child(ren) Referral: Documented for each child's identified needs?	Desk ☐ Site ☐	Met Part Met Not Met NA	
14.06	If FAS screening indicated, has the referral been completed? (Tx policy and contract).	Desk Site	Met Part Met Not Met NA	
14.07	W&F Case Management Progress Notes should identify the W&F goal being addressed and tie back to needs identified in W&F intake.	Desk ☐ Site ☐	Met Part Met Not Met NA	
14.08	W&F Case Management claims are supported by appropriate, corresponding documentation (progress note) which matches the authorized service.	Desk □ Site □	Met Part Met Not Met NA	
14.09	Discharge plan includes after-care appointment(s) for women and children services (for needs identified in W&F intake).	Desk □ Site □	Met Part Met Not Met NA	If no after-care appointments are made, then reason why must be documented.
15.00				
	Administrative	Initials	MCOID_	SITE Location
15.01	Evidence of Coordination of care with primary care provider, or documentation as to reason why this was not done. (contract)	Desk ☐ Site ☐	Met Part Met Not Met NA	(May be in provider created form signed by client and if client is agreeable, consent should be obtained for PCP).

15.02	Certification of Eligibility (NorthCare form):	Desk	Met	
	Outpatient – must be in client file.	Site	Part Met	
			Not Met	
			NA	
15.03	Consumer Choice: Consumer sign-off on	Desk	Met	
	receiving choice of treatment program in	Site	Part Met	
	consumer file		Not Met	
			NA	
15.04	Communicable Disease form completed and in	Desk	Met	
	chart.	Site	Part Met	
			Not Met	
	(Contract-Attachment AE)		NA	
15.05	MDHHS 5515 Consent is completed and signed	Desk	Met	
	by client and in chart.	Site	Part Met	
			Not Met	
			NA	
15.06	TB Tests: Residential only- documentation	Desk	Met	
	that TB test was completed	Site	Part Met	
			Not Met	
			NA	

Source References for NorthCare Site Review Protocol 2021					
Source Document					
42 CFR 438.10, Information Requirements					
42 CFR 438.100, Enrollee Rights					
42 CFR 438.102, Provider-Enrollee Communications					
42 CFR 438.208, Coordination and Continuity of Care					
42 CFR 438.210, Coverage and Authorization of Services					
42 CFR 438.240, Quality Assessment and Performance Improvement					
42 CFR 438.406, Handling of Grievances and Appeals					
42 CFR 438.408, Resolution and Notification: Grievances and Appeals					
42 CFR 438.6, Special Contract Provisions Related to Payment					
42 CFR Part 430, 431 et al CMS Final Rules for Home and Community Based Services (HCBS)					
Administrative Rules - R 330.2810, Eligibility and Initial Screening					
Balance Budget Act of 1997 - 438.214 Provider Selection					
CMS Final Rules for Home and Community Based Services (HCBS)					
Federal Sentencing Guidelines Chapter 8, Part B.2 Effective Compliance and Ethics Program					
General rules Practice Guidelines and Services 42 CFR 438.236(c) 42 CFR 438.236(d) AFP 2					
HIPAA Security Regulations					
HITECH Act Regulations					
MDHHS Contract					
MDHHS Policies and Practice Guidelines, Provider Credentialing					
MDHHS HAB Waiver Standards					
MDHHS Review Protocols, 1915 C-Waiver Site Review FY17					
MDHHS Review Protocols, B Waiver					
MDHHS Technical Advisory (TSG) – Guidelines for Establishing and Managing General Fund Waiting Lists					
Medicaid Integrity Program (CMS)					
Medicaid Provider Manual					
MI Health Link Contract – ICO/PIHP					

Michigan Mental Health Code, Act 258 of 1974 Michigan Public Health Code, Act 368 of 1978, Part 161 General Provisions NorthCare Credentialing Policies NorthCare Delegation Agreement NorthCare ELMER Standard Operating Procedures/Policies NorthCare Incident Report Codes Revisions 4-29-16 F NorthCare Operations Manual – SUD Providers NorthCare Policy - QI Incident, Event & Death Reporting & Monitoring Policy NorthCare Practice Guidelines NorthCare Provider Manual NorthCare Regulatory Compliance Program Plan and Policies NorthCare SOP-Board of Financial Responsibility NorthCare SOP-Staff Training Specific to Consumer IPOS NorthCare Training Policy URAC Standards – Health Plan v.7.3 NorthCare Network Management Policies and Procedures 42 CFR 438.236, Practice Guidelines and Services NorthCare Utilization Management Plan NorthCare Service Authorization Policy

NorthCare SOP-ELMER Merge Duplicate Records Procedure