
Title 1	Northern Lakes Policies
Part 103	Managed Health Division
Subpart A	Network Administration
Policy No.	103.120
Subject	Conflict of Interest

Applicability

Policy applies to all MHD staff, NLCMH staff, and contract and network providers.

Policy

Presently Northern Lakes CMH is both a Prepaid Inpatient Health Plan (Manager of Medicaid funds) and is a manager of state and local funds provided to assure services as defined in the Michigan Mental Health Code. By community need, choice, and history Northern Lakes CMH is also a direct provider of service. Given this dual responsibility Northern Lakes CMH is committed to success in both roles while remaining mindful of conflict of interest risk.

The Managed Care Division and the Provider Division of Northern Lakes CMH shall assure protections are implemented to prevent potential conflicts of interest.

The Provider Division of Northern Lakes CMH will be subject to the same standards and requirement as other providers. Compliance with provider requirements will be monitored primarily through annual site reviews utilizing the same review instruments as used with the other CMH providers. Additionally, a coordination agreement will be completed and monitored no less than annually which specifies the responsibilities of each division. Performance of the Provider Services Division will be monitored routinely via review of MMBPIS data, client satisfaction survey and other measures. The Provider Services Division will be subjected to the same provider sanctions as other CMH's in the network. Representatives from the Provider Services Division will participate in the PIHP Quality Oversight Committee, Utilization Management Committee and other committees as requested and will participate in Network provider meetings and activities.

Procedures

None.

Adoption Date: June 4, 2006

Review Dates: June 5, 2009

Revision Dates: