
Title 1	Northern Lakes Policies
Part 103	Managed Health Division
Subpart B	Contract Management
Policy No.	103.205
Subject	Provider Sanctions

Applicability

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

Policy

All contracts between Northern Lakes CMH and network providers shall contain provisions permitting the MHD to impose sanctions on network providers that are in breach of any contractual requirement or standard or in violation of any applicable healthcare statute or regulation. At a minimum, Northern Lakes CMH contracts shall reserve the authority to:

- Withhold all or part of a payment to a provider;
 - Recoup from payments currently due to the provider any amount previously paid to the provider for claims determined on retroactive review to be ineligible for reimbursement;
 - Require providers to consent to and implement the terms of Corrective Action Plans (including compliance audits and monitoring procedures) designed to address errors and/or noncompliance;
 - Terminate the contract for breach of any contractual requirement or standard or violation of any applicable healthcare statute or regulation.
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Procedures

1. The Managed Health Division develops standard measures of performance that are applied across the provider network. These measures are applied to areas such as utilization and cost, clinical outcomes, process, performance, and consumer satisfaction.
2. Data gathered from those measures are used to develop a "profile" of each provider.
3. The profiles are used as a tool to compare performance across the network and to ensure quality of network services.

Pertinent Data from the Provider Profiles is documented and shared with consumers and their families, providers, and the community. Information may be shared individually with providers or at general provider and/or consumer gatherings. Also, provider profile information may be shared with the community at large in publications such as local newspapers or annual reports. This sharing of information establishes a process for

continuous quality improvement so that necessary corrections can be noted and remedied, and that best practice can be highlighted.

Adoption Date: June 4, 2006

Review Dates: June 5, 2009

Revision Dates: