



# North Sound Behavioral Health Organization, LLC

301 Valley Mall Way, Suite 110, Mount Vernon, WA 98273  
<http://northsoundbho.org> • 360.416.7013 • 800.684.3555 • F 360.416.7017

North Sound BHO Contract Memorandum 2018-006

Date: March 23, 2018

To: Donna Konicki, Bridgeways  
Will Rice, Catholic Community Services  
Tom Sebastian, Compass Health  
Beratta Gomillion, Center for Human Services  
Linda Grant, Evergreen Recovery Centers  
Andrew Hill, Excelsior  
Mike Cunningham, Ideal Balance  
Jenny Billings, Lake Whatcom Residential Treatment Center  
Debbie Farrar, Northshore Youth and Family Services  
Corky Hundahl, Phoenix Recovery Centers  
Steve Schwalb, Pioneer Human Services  
Desmond Skubi, Sea Mar Community Health Centers  
Mark Loes, Sundown M Ranch  
Sue Closser, Sunrise Services  
Norman Johnson, Therapeutic Health Services  
Phil Smith, Volunteers of America

From: Joe Valentine, Executive Director

Subject: Data Integrity in North Sound BHO Consumer Information System (CIS)

Greetings Provider CEOs:

Please find attached the "letter dated 3/22/18" regarding the data integrity for North Sound BHO's CIS.

There have been two (2) areas of focus for data integrity in CIS:

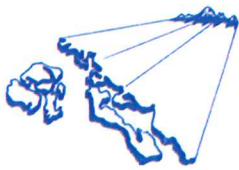
- Accuracy of data file submitted via the Secure File Transfer Protocol (SFTP) Server and substance use disorder (SUD) Web Portal, addressed in NMs 2017-014 and 019; and
- Data Integrity regarding accuracy and completeness of Behavioral Health Agencies (BHA) provider validation of eligibility and authorizations for individuals prior to starting an episode of care and provision of outpatient services funded by the BHO, addressed by this NM 2018-006.

Two (2) potential issues were found with the second focus area.

Please read the attached letter and follow instructions contained within.

Please ensure all appropriate staff receives this information and appropriate actions are taken.

cc: North Sound BHO Staff  
Contract File



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March 22, 2018

## TO: North Sound BHO Provider CEOs

Our BHO and Behavioral Health Agencies (BHAs) continue to partner to maintain and improve the integrity of the data we all use to provide and manage services for individuals within our systems. While most of our shared systems work extremely well, the BHO recently focused efforts on data accuracy and completeness in the Consumer Information System (CIS).

Our first area of focus was the accuracy of data files submitted via the Secure File Transfer Protocol (SFTP) Server and Substance Use Disorder (SUD) Web Portal. Following initial notification, data error correction issues are being addressed through the contract remedial action process.

Now, a second area of focus for data integrity by the BHO in recent months is the accuracy and completeness of BHA provider validation of eligibility and authorizations for individuals prior to starting an episode of care and provision of outpatient services funded by the BHO.

A cross-functional BHO Team conducted a retrospective review of eligibility and authorizations for individuals in outpatient episodes for the month of September 2017. In doing so, two types of potential issues were found for individuals who were authorized by the BHA to receive Medicaid services, for which the BHO validation showed in comparison to ProviderOne, did not have North Sound BHO Medicaid eligibility at the time of authorization and service.

There are two types of potential contract non-compliance, which without remedy could constitute fraud:

- The first is individuals who were authorized by the BHA as Medicaid eligible though on validation with ProviderOne are not Medicaid eligible, meaning they do not have a BHO benefit.
- The second is individuals who have an out of region eligibility with another BHO.
  - Our BHO has allowed BHAs in our network to assess individuals who have an out of region eligibility. However, these individuals are not authorized to begin an outpatient episode of care and treatment until their eligibility has been converted in Provider One to North Sound BHO.
  - Per Policy 3045.00, Eligibility Verification and the BHO-BHA contract, the latter regarding Medicaid eligibility, "Contractor shall verify an individual's Medicaid eligibility at each appointment. For individuals not currently enrolled in Medicaid, Contractor shall refer individuals to the designated in-person assistor agency in their catchment area. Contractor shall act in accordance with NORTH SOUND BHO policy on Eligibility Verification herein incorporated by reference."

A report of the individual level data for each BHA that the BHO validated that falls into either of these two categories can be obtained by the BHA by contacting Dennis Regan, Data Support Analyst, at [dennis\\_regan@northsoundbho.org](mailto:dennis_regan@northsoundbho.org) or 360.416.7013 x 641.

Each BHA is tasked to obtain and review their report against agency data files to determine and provide a written report to the BHO of their analysis and suspected root cause(s), to include the current work flow process and frequency used by their BHA to validate eligibility verification. Submission of the BHA written report of review is expected within 45 calendar days from the date of this letter, no later than beginning of business, May 7, 2018 to [deliverables@northsoundbho.org](mailto:deliverables@northsoundbho.org).

The BHO will review submissions and determine next steps based on individual BHA analysis and feedback.

Sincerely,

A handwritten signature in blue ink, appearing to read "Joe Valentine", is written over a light blue circular stamp.

Joe Valentine  
Executive Director

CC: Contract File