



North Sound Behavioral Health Organization, LLC

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North Sound BHO Contract Memorandum 2018-023

Date: November 5, 2018

To: Tom Sebastian, Compass Health and Compass Whatcom
Donna Konicki, Bridgeways
Jenny Billings, Lake Whatcom RTC
Will Rice, Catholic Community Services Northwest
Claudia D'Allegrì, Sea Mar
Cammy Hart-Anderson, Snohomish County MH/CD/Vets Division Manager
Phil Smith, Volunteers of America
Shanon Hardie, Unity Care NW
Sue Closser, Sunrise Services
Robert Sullivan, Pioneer Human Services
Beratta Gomillion, Center for Human Services
Corky Hundahl, Phoenix Recovery Services
Julie Lord, Pioneer Human Services
Linda Grant, Evergreen Recovery Centers
Marli Bricker, Therapeutic Health Services
Jane Jisun Kim, Asian Counseling Treatment Services
Tony Prentice, American Behavioral Health Services
Annette Klinefelter, Daybreak Youth Services
Joe Foster, Lifeline Connections
Art Jacobs, New Horizon
Christine Lynch, Olalla Recovery Centers
Melissa Laws, Prosperity Wellness
Mark Loes, Sundown M Ranch

From: Joe Valentine, Executive Director

Subject: Language Changes in Exhibit U – Management Information System

Greetings BHA Providers:

Due to the changes occurring in our information systems as we prepare for the transition to Integrated Managed Care we are reducing the time allowed to implement changes in the IS system. Currently, contracted providers have 90 days to implement changes, we are removing the 90-day timeframe.

We will work with providers to ensure this is not an unrealistic timeline and will provide technical assistance when necessary. Attached you will find Exhibit U, with the change to the timelines. This numbered memorandum is hereby incorporated by reference into your contract with the North Sound BHO.

cc: Cindy Ferraro, Bridgeways
Becky Olson-Hernandez, Compass Health
Pat Morris, Volunteers of America
Danae Bergman, Center for Human Services
Jackie Henderson, Island County Coordinator
Barbara LaBrash, San Juan County Coordinator
Rebecca Clark, Mental Health Program Coordinator
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Anji Jorstad, Snohomish County Coordinator
Anne Deacon, Whatcom County Coordinator
Marsh Kellegrew, Evergreen Recovery Services
Rowell Dela Cruz, Pioneer Human Services
Perry Mowery, Whatcom County
Elizabeth Maldonado, New Horizon
Zay McShane, Lake Whatcom Center
Contract File

Management Information Systems

Contractor shall ensure the existence and operation of an information system within their organization. It shall have the ability to be used internally, and to collect and report data as required by North Sound Behavioral Health Organization (North Sound BHO). This data shall be useable as management data for audit purposes and contain sufficient information to track termination from North Sound BHO services. (42 CFR 434.53)

Contractor shall notify North Sound BHO of any change to their information system, at the time planning begins for implementation that will have any effect on the data submitted to or otherwise required to be collected by North Sound BHO. Prior to implementing changes to production systems, Contractor shall conduct testing as noted below.

Contractor shall participate in the North Sound BHO Consumer Information System (CIS) Workgroup and information systems policy groups when requested by North Sound BHO.

Contractor shall comply with North Sound BHO policies and procedures regarding quality, accuracy, and data reporting.

Periodically, North Sound BHO may receive requests for information from Centers for Medicare and Medicaid Services (CMS), the legislature, Division of Behavioral Health and Recovery (DBHR), etc., that may not be readily available in the North Sound BHO CIS and require collection of this information from Contractor. Contractor shall ensure that requested information is received in a manner that will allow North Sound BHO to make a timely response to these inquiries.

North Sound BHO CIS Data Dictionary

The North Sound BHO CIS Data Dictionary can be found online at: <http://northsoundbho.org/DataDict/>. This set of documents describes the data, format, and content that is to be electronically submitted to North Sound BHO.

- Contractor shall provide all applicable data as described in the North Sound BHO CIS Data Dictionary.
- Contractor shall participate in North Sound BHO decisions related to North Sound BHO CIS Data Dictionary changes.
- Contractor shall implement changes made to the North Sound BHO CIS Data Dictionary within 90 days from the date of published changes. In the event that shorter timelines for implementation of changes are required or necessitated by either a court order or agreement resulting from a lawsuit or legislative action North Sound BHO will provide as much notice as possible of the impending changes and provide specifications for the changes as soon as they are available. Contractor will implement the changes required by the timeline established in the court order, legal agreement, or legislative action.

- Contractor shall implement changes to the content of national standard code sets (such as Current Procedural Terminology [CPT] Codes, Healthcare Common Procedural Coding System [HCPCS], Place of Service code sets) per the instructions and implementation schedule or deadline from the issuing organization. If the issuing organization does not provide an implementation schedule or deadline, Contractor shall implement the changes within 90 days.

Testing

Prior to the implementation of any change which has an effect on the data submitted to North Sound BHO – regardless of whether as a result of North Sound BHO CIS Data Dictionary changes or Contractor data quality improvement activities – testing must be conducted and successfully completed.

- Prior to moving changes into production systems, Contractor shall submit test batches of the changes to the North Sound BHO CIS Test System.
- Test batches must be generated from Contractor test system and contain a variety of different scenarios related to the changes.
- Depending on the testing being done North Sound BHO will provide a standard batch report and/or detailed analysis of the test batch identifying issues, if any, to Contractor.
- Once North Sound BHO approves testing of batches, Contractor will be allowed to move changes into production systems. North Sound BHO approval will be given after a test batch produces no errors or other mutually agreed upon amount of specific errors.

North Sound BHO CIS Data Extract

The North Sound BHO CIS Data Dictionary can be found online at: <http://northsoundbho.org/DataDict/>. This set of documents describes the data, format, and content that is to be electronically submitted to North Sound BHO.

- Contractor shall provide all applicable data as described in the North Sound BHO CIS Data Dictionary.
- Contractor shall participate in North Sound BHO decisions related to North Sound BHO CIS Data Dictionary changes.
- Contractor shall implement changes made to the North Sound BHO CIS Data Dictionary in the timeframe required by North Sound BHO. In the event that short timelines for implementation of changes are required or necessitated by either a court order or agreement resulting from a lawsuit or legislative action North Sound BHO will provide as much notice as possible of the impending changes and provide specifications for the changes as soon as they are available. Contractor will implement the changes required by the timeline established in the court order, legal agreement, or legislative action.
- Contractor shall implement changes to the content of national standard code sets (such as Current Procedural Terminology [CPT] Codes, Healthcare Common Procedural Coding System [HCPCS], Place of Service code sets) per the instructions and implementation schedule or deadline from the issuing organization.

Timeliness

At a minimum, Contractor shall transmit data to North Sound BHO CIS once per week except as noted below.

Emergency Services

The provision of any emergency service shall be collected by the Contractor information system and submitted to the North Sound BHO CIS within twenty-four hours from the completion of that service. Emergency services are those that would be reported via the following transactions:

- County Designated Mental Health Professional (CDMHP) Investigation (160.02)
- Involuntary Treatment Act (ITA) Hearing (162.02)
- Outpatient Services (120.03) as related to a CDMHP Investigation or ITA Hearing.

Routine Data Submission

Required data must be reported by the 5th calendar day of the close of each calendar month in which the event occurred. For example:

- An encounter that occurred in January shall be submitted by the 5th of February.
- An Authorization Request where the requested start date is in July must be submitted by the 5th of August.
- A change in a client's address that occurred in March must be reported by the 5th of April.

Error Resolution

After North Sound BHO processes your submitted batches, a batch report will be generated that will show each record submitted per the North Sound BHO CIS Data Dictionary, if it successfully passed validation rules, and any errors that may be applicable to the record. Validation rules applied to submitted records can be found in the North Sound BHO CIS Data Dictionary. This batch report will be made available in Contractor 'Outbound' directory on the North Sound BHO SFTP site.

Certain errors may appear in your batch reports that are not able to be corrected. Corrections to non-correctable errors are not expected to be acted upon and will not show up in other error-related reports. Some of these errors include:

- Requesting to delete a record that does not exist in the North Sound BHO CIS.
- Submitting a service that is over one year old.

Contractor shall make corrections in their data system for any record that errors and submit the corrected data to North Sound BHO in a new batch within 10 calendar days of the batch report being generated. Contractor shall maintain the originally submitted record key when submitting corrections.

Outstanding Errors

Contractor shall ensure sufficient resources are made available to Information System and/or Data Integrity staff to correct any errors that are present on the Outstanding Error report. The Outstanding

Error report will be generated daily and will be included in the Data_Extract.zip file in the Contractor 'Outbound' directory on the North Sound BHO SFTP site. Errors on the Outstanding Error report that have been outstanding for more than 10 calendar days will be an indication, in part, of non-compliance with error resolution timelines.

Additional Data Cleanup Reports

North Sound BHO will routinely generate additional data cleanup reports that will be provided to Contractor. Contractor shall go through said reports within 10 calendar days and do one of the following:

1. Make corrections in Community Mental Health Agency (CMHA) information system then submit corrected data to North Sound BHO CIS; or
2. Notify North Sound BHO IS/IT Administrator that the record(s) on the cleanup report is/are correct.

Business Continuity and Disaster Recovery

Contractor shall create and maintain a business continuity and disaster recovery plan (BCDRP) that ensures timely reinstatement of the consumer information system following total loss of the primary system or a substantial loss of functionality. The plan must be in written format, have an identified update process (at least annually) and a copy must be stored off site.

Contractor BCDRP must address, at a minimum, the following:

- A mission or scope statement;
- An appointed Information Services Disaster Recovery Staff;
- Provisions for backup of key personnel, identified emergency procedures, and visibly listed emergency telephone numbers;
- Procedures for allowing effective communication, applications inventory and business recovery priority, and hardware and software vendor list;
- Confirmation of updated system and operations documentation;
- Process for frequent backup of systems and data;
- Off-site storage of system and data backups;
- Ability to recovery data and systems from backup files;
- Designated recovery options which may include use of a hot or cold site;
- Evidence that disaster recovery tests or drills have been performed.