

 WRAPAROUND MILWAUKEE Policy & Procedure	Date Issued: 7/1/07	Reviewed: 11/30/10 By: JM Last Revision: 7/1/07	Section: PROVIDER NETWORK	Policy No: 064	Pages: 1 of 1
☒ Wraparound ☒ Wraparound-REACH ☒ FISS ☒ Project O-Yeah	Effective Date: 7/1/07	Subject: REPORTING OF PROVIDER NETWORK PRACTITIONER SANCTIONS/DISCIPLINARY ACTIONS TO REGULATORY AGENCIES			

I. POLICY

It is the policy of Wraparound Milwaukee to take appropriate action to report adverse activity associated with providers and practitioners providing services through the Wraparound Milwaukee Provider Network.

II. PROCEDURE

As indicated in the Wraparound Milwaukee Fee-for-Service Agreement, agencies and individual providers may be suspended or removed from the Provider Network and may have any or all Agreements with the Milwaukee County Department of Health and Human Services (DHHS) terminated for cause, and/or may be debarred from future contracting opportunities with DHHS for commission of, but not limited to, the following offenses: Commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing under a contract or agreement with the DHHS; violation of Federal or State antitrust statutes; commission of embezzlement, theft, forgery or bribery; falsification or destruction of records including, but not limited to, case records, financial records, or billing records; making false statements; receiving stolen property; engaging in conduct or practices that endanger the health or safety of participants/families; failure to comply/cooperate with DHHS Quality Assurance reviews or audits; failure to permit access to or provide documents and records requested by the DHHS; failure to correct findings or other conditions identified in a Quality Assurance review, County audit or annual independent audit; and/or any other breaches of the Fee-for-Service Agreement.

Sanctions imposed on Wraparound Milwaukee credentialed mental health and AODA (Alcohol and Other Drug Abuse) practitioners and other providers rendering services through the Wraparound Milwaukee Provider Network may be subject to reporting to one or more of the following entities based on the agency and/or individual provider license/certification and scope of practice.

- Milwaukee County Behavioral Health Division
- Milwaukee County Department of Administration
- Milwaukee County Department of Audit
- Milwaukee County District Attorney's Office (cases involving fraud or injury to a client)
- State of Wisconsin Department of Regulation and Licensing
- National Practitioner Data Bank
- Wisconsin State Medical Examining Board
- Contracted Health Plans and Managed Care Organizations

Milwaukee County Department and Program responsibility for reporting agency and/or individual provider/practitioner misconduct to the appropriate authorities is determined in consultation with the Milwaukee County Department of Contract Administration. In addition to maintaining a record in the practitioner's credentialing file, a record of action taken in response to adverse provider activity is maintained in the Wraparound Milwaukee Information Management System known as Synthesis. Sanctions imposed on vendors and individual providers are detailed in the Vendor "Status List" that is maintained in Synthesis. The "Status List" includes a record of specific vendor or individual provider status changes or sanctions (i.e., suspensions, terminations, etc.), a description of the circumstances leading to the disciplinary action, action taken by Milwaukee County, and final outcome related to the record entry. Record entries are cumulative and can be made and viewed by members of the Milwaukee County Centralized Quality Management Committee and approved staff who work in Milwaukee County Department of Contract Administration.

Reviewed & Approved by: Bruce Kamradt
 Bruce Kamradt, Director