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MILWAUKEE COUNTY  
DEPARTMENT OF HEALTH  
& HUMAN SERVICES  
**BEHAVIORAL  
HEALTH SERVICES**

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Owner Dana James

Policy Area Wraparound  
(Wrap, REACH,  
youth CCS)-  
Vendor

## #064- Reporting of Provider Network Providers: Sanctions/ Disciplinary Actions to Regulatory Agencies

### I. POLICY

It is the policy of Children's Community Mental Health Services Milwaukee (hereby referenced as Wraparound Milwaukee) to take appropriate action to report adverse activity associated with providers providing services through the Wraparound Milwaukee Provider Network.

### II. PROCEDURE

As indicated in the Wraparound Milwaukee Fee-for-Service Agreement and Purchase of Service Contract, 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 and Purchase of Service Contract.

Sanctions imposed on Wraparound Milwaukee 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 Services
- Milwaukee County Department of Administration Services
- Milwaukee County Office of Comptroller: Audit Services
- Milwaukee County District Attorney's Office (cases involving fraud or injury to a client)
- Milwaukee County Mental Health Board
- State of Wisconsin Department of Safety and Professional Services
- National Practitioner Data Bank
- Wisconsin State Medical Examining Board
- Contracted Health Plans and Managed Care Organizations
- State of Wisconsin – Department of Health Services
- System for Award Management (SAM)
- Office of the Inspector General (OIG)

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 DHHS Management Services. In addition to maintaining a record in the provider's file, a record of action taken in response to adverse provider activity is maintained by Wraparound Milwaukee.

## Approval Signatures

Step Description	Approver	Date
	Michael Lappen: BHD Administrator	8/23/2022
	Brian McBride: ExDir2 – Program Administrator	8/23/2022
	Dana James: Integrated Services Manager- Quality Assurance	8/18/2022
	Dana James: Integrated Services Manager- Quality Assurance	8/18/2022