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

**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.

**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 Services
- Milwaukee County Office of Comptroller: Audit Services Division
- Milwaukee County District Attorney's Office (cases involving fraud or injury to a client)
- State of Wisconsin Department of Safety and Professional Services
- National Practitioner Data Bank
- Wisconsin State Medical Examining Board
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 Division. 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 by Wraparound Milwaukee.

Attachments: No Attachments

<table>
<thead>
<tr>
<th>Step Description</th>
<th>Approver</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Approval Signatures</td>
<td>Michael Lappen: 11008000-BHD Administrator</td>
<td>12/14/2017</td>
</tr>
<tr>
<td></td>
<td>MaryJo Meyers: 11003003-Director Wraparound Program</td>
<td>12/14/2017</td>
</tr>
<tr>
<td></td>
<td>Pamela Erdman: 12008005-Placement Resources Manager</td>
<td>12/14/2017</td>
</tr>
<tr>
<td></td>
<td>Dana James: 21011004-Quality Assurance Coordinator</td>
<td>12/13/2017</td>
</tr>
</tbody>
</table>