



January 1, 2016

Dear CMHPSM Regional Network Providers,

The Community Mental Health Partnership of Southeast Michigan (CMHPSM) and partner CMHSPs in Lenawee, Livingston, Monroe and Washtenaw counties are revising the federal debarment verification process effective January 1, 2016. The CMHPSM was not in full compliance with the previous process and had to submit a corrective action plan increases compliance with federal regulations by expanding the information collected from the CMHPSM provider network and formalizing the requirements within a new CMHPSM Debarment Suspension and Exclusion Policy which can be found on the policies page of our website: www.cmhpsm.org/policies or directly [here](#).

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All CMHPSM network providers will continue to be contractually required to self-monitor on a monthly basis, and will still need to submit identifying information for required disclosures. The CMHPSM Debarment, Suspension and Exclusion policy expands upon the previous contractual requirements in a few areas which we felt should be highlighted:

1. Our previous process did not previously request submitting date of birth or middle name. To reduce the number of false positives we are expanding the search fields and thus need to collect: date of birth as well as first, middle and last names.
2. The CMHPSM has determined it does not want to collect or store all required disclosures social security numbers as required by [42 CFR Part 455 Subpart B](#). Providers supplying individual information or individuals with information submitted that match the first name, last name and date of birth of a record found in the federal or state exclusion databases will be immediately notified of such a match. The organization or individual (in the instance the individual is an independent provider) must provide the individual's social security number within 24 hours of such a request to verify the individual is not a match.
3. The guidance related to individuals associated with provider organizations has been formalized and can be found in Standard C.2.b of the new Debarment, Suspension and Exclusion policy related to owners, board members and managing employees.

The CMHPSM and partner CMHSPs have created new forms for submitting identifying information for your organization and for individuals associated with your organization. Please visit the Federal Debarment Resources section found here: www.cmhpsm.org/providermanual for more information related to these changes.

All CMHPSM network providers must complete and return all new information to their CMHPSM or CMHSP contract contact by Friday February 26, 2016.

As always the CMHPSM appreciates your hard work as we jointly comply with the requirements of our funders. As you know the mental health system has transitioned to an almost entirely federally funded endeavor and substance use disorder services have moved in that direction as well.

Sincerely,

A handwritten signature in blue ink, appearing to read "James Colaianne".

James Colaianne, COO
Community Mental Health Partnership of Southeast Michigan