



Health Care Agency Behavioral Health Services Policies and Procedures	Section Name:	Compliance
	Sub Section:	Other
	Section Number:	07.03.02
	Policy Status:	<input checked="" type="checkbox"/> New <input type="checkbox"/> Revised

	SIGNATURE	DATE APPROVED
Director of Operations Behavioral Health Services	<u>Signature on File</u>	<u>10/30/17</u>

SUBJECT: Behavioral Health Services Compliance Officer

PURPOSE:

To describe the role of the Behavioral Health Services Compliance Officer. The Behavioral Health Services (BHS) Director of Authority and Quality Improvement Services (AQIS) has been designated as the BHS Compliance Officer. The BHS Compliance Officer is the focal point for compliance activities within BHS.

POLICY:

The BHS Compliance Officer is responsible for the implementation within BHS of compliance activities that promote the seven elements of an effective compliance program establish by Federal Sentencing Guidelines.

The BHS Deputy Agency Director provides oversight of the BHS Compliance Officer’s activities. The BHS Compliance Officer reports directly to the BHS Deputy Agency Director.

SCOPE:

BHS County and County Operated providers.

PROCEDURE:

- I. BHS Compliance Officer Responsibilities
 - A. Act as the BHS point person for follow up on compliance issues referred from the Health Care Agency (HCA) Office of Compliance.
 - B. Advise the BHS Deputy Agency Director of compliance issues within BHS.
 - C. Coordinate with appropriate managers and staff within Adult and Older Adult Behavioral Health (AOABH) and Children, Youth and Prevention Behavioral Health (CYPBH) to implement compliance related activities.
 - D. Develop and implement policies and procedures to ensure appropriate compliance related activities dealing with issues of fraud, waste and abuse in relation to payment for services.

- E. Serve as one of the BHS representatives to the HCA Compliance Committee.
- F. Oversee the development of an annual provider training to ensure employees are educated about the Compliance Program, Code of Conduct, policies and procedures, use of the Agency compliance telephone hotline, documentation and billing requirements and other specific compliance issues as deemed necessary.
- G. Maintain reporting channels to facilitate the reporting of compliance related issues. This includes actual or potential violations of law, regulation, policy, procedure, or the Code of Conduct in a confidential manner, without fear of retaliation.
- H. Identify potential areas of compliance risk for BHS as well as advising and assisting BHS management in coordinating internal compliance policies and procedures.
- I. Coordinate compliance investigations of alleged violations of law and the Code of Conduct and making independent and objective recommendations for corrective action, if necessary to prevent recurrence of a violation. Respond appropriately if a violation is uncovered, including proper reporting of violations of law to management and to legal counsel. Conduct follow-up reviews to determine whether problems or violations have been effectively addressed.