	Shasta County Health and Human Services Agency Managed Care, Compliance & Quality Management
	Compliance as an Element of Performance

1.0 Persons/Programs Affected *(Check all that apply)*

☒ All Staff	☐ All Managers	☐ All Supervisors	

*Each branch to have unique Persons/Programs Affected
*All employees include all employees–full-time, part-time and extra-help.

2.0 Definitions

Compliance Officer means the person designated by the Mental Health Director and is delegated authority for the implementation, administration, and oversight of the Compliance Program. The Compliance Officer is delegated authority for development and day-to-day operations of the Compliance Program.

Compliance Program means the internal policies, procedures and processes designed by the Shasta County Health and Human Services Agency (HHSA) to ensure federal, state and local rules, laws and regulations are met. The Compliance Program is designed to prevent and detect violations of any statute, regulation or guideline applicable to federal health care programs in the conduct of operations by employees and other covered entities/individuals.

3.0 Policy

The Shasta County Health and Human Services Agency (HHSA), through its Mental Health Plan (MHP), ensures that employees follow all Compliance Program policies and procedures to the best of their ability. Actions shown to be willfully ignoring established policies and procedures will be subject to discipline according to Shasta County Personnel Rules and/or employee's bargaining unit Memorandum of Understanding. Managers and supervisors are responsible for detecting possible compliance issues and reporting them to the Compliance Officer. Managers and supervisors will be subject to discipline for failure to adequately instruct their subordinates or for failing to detect noncompliance with applicable Compliance Program policies and procedures. Applicable Compliance Program policies and procedures are available on the Intranet at http://intranet/hhsa/index/Compliance.aspx.

The promotion of, and adherence to Compliance Program related policies and procedures is a factor in evaluating the performance of all employees, contractors and

agents of Shasta County. Employees will be periodically trained regarding these policies and procedures, and any new Compliance Program policies and procedures that are established.

4.0 Procedure

The Compliance Officer will ensure initial and annual Compliance Program training to all MHP employees (See Compliance Education and Training Program Policy and Procedure).

All managers and supervisors are required to comply with the following:

- Discuss the Compliance Program policies and procedures and legal requirements with all supervised personnel and all contractors and agents utilized, which are applicable to their job function;
- Inform all supervised personnel that strict compliance with Shasta County Compliance Program policies and procedures is a condition of continued employment;
- Review employee adherence to the Compliance Program policies and procedures and legal requirements, which are applicable to their job, yearly, as a Core Competency in their annual performance evaluation.
- Disclose to all supervised personnel that disciplinary action, in compliance with Shasta County Personnel Rules and/or employee's bargaining unit Memorandum of Understanding, will be taken, up to and including termination or revocation of employment, for violation of Compliance Program policy and procedures.

5.0 Attachments

N/A

6.0 Revision History

Date	No.	Action:
05/27/2014	2014-12	Adopted

7.0. Other Agency Involvement

N/A

8.0 **Authorization/Signatures**

The above policy and procedure has been reviewed and is authorized for immediate implementation:

Donnell Ewert, MPH, Director — Date: 5/30/14

Micki Mills, Program Manager, Business & Support Services
Compliance Officer
Managed Care Compliance Program — Date: 5/29/2014