



**Shasta County Health and Human Services Agency
Managed Care, Compliance & Quality Management**

Compliance Officer and Compliance Committee Policy

1.0 Persons/Programs Affected (Check all that apply)

<input checked="" type="checkbox"/> All Staff	<input type="checkbox"/> All Managers	<input type="checkbox"/> 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 Committee means the Committee designated by the Compliance Officer to provide oversight to the Compliance Program. The Compliance Committee will provide general oversight to the Compliance Officer in the implementation of the Compliance Program.

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 has the authority for and may delegate responsibility 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 (HHS) to ensure federal, state and local rules, laws and regulations are met. The Compliance Program is designed to prevent fraud, waste and abuse, and 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.

Compliance Workplan means a biennial report developed by the Compliance Committee which shall detail the activities to be undertaken during the next two (2) years and a review of the prior biennial Compliance Workplan to ensure adherence to the Shasta County Compliance Program.

3.0 Policy

The Compliance Officer is the lead administrator for the Compliance Program and shall be the HHS Business and Support Services Director or Deputy Director and reports to the Health and Human Services Agency Director (the Mental Health Director). The Compliance Officer is vested with the responsibility and authority to implement the Compliance



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Program and has the authority to delegate responsibility for the development and day to day operations of the Compliance Program.

4.0 Procedure

A. The Compliance Officer or designee shall:

- Monitor and oversee the Compliance Program;
- Be the Shasta County Health and Human Services Agency (HHS), Mental Health Managed Care Plan (MHP) authority on standards of conduct and legal risks associated with billing for services;
- Develop policies and procedures for implementation of the Compliance Program;
- Coordinate efforts to implement the Compliance Program;
- Encourage awareness among staff about compliance matters and the importance of adherence to the Compliance Program by developing, coordinating, and participating in a training program that focuses on compliance issues;
- Supervise monitoring, auditing and reporting of activity within the scope of the Compliance Program;
- Investigate possible noncompliance;
- Maintain a retribution free system for reporting of non-compliance or concern about the Compliance Program;
- Assist in the development of corrective action plans;
- Report any violations of Health Insurance Portability and Accountability Act (HIPAA) requirements to the Shasta County Health and Human Services Agency Privacy Officer;
- Chairs the Compliance Committee;
- Receive all Compliance Hotline calls and conduct investigations, if appropriate; report to the Compliance Committee of all Compliance Hotline calls and investigations, including findings;
- Report results of monitoring, auditing and reporting activity to the Compliance Committee; and
- Provide leadership for MHP's compliance efforts.



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- B. The Compliance Officer or designee shall have specific authority to review billings/billing practices and payroll information. The Compliance Officer may prohibit billing of services if the Compliance Officer believes the billing would not comply with applicable law.
- C. The Compliance Officer shall maintain a Compliance Committee which shall meet a minimum of four times per year or more frequently as needed. The Compliance Committee shall: develop an annual Compliance Workplan, review sanction reports; provide ongoing assessment of the effectiveness of the Compliance Program and make recommendations for changes, if needed; review voids and disallowed claims; review or appoint clinical staff sub-committee to review appeals; provide strategies for implementation of Compliance audit recommendations; and provide ongoing review of Shasta County MHP compliance policies and procedures. The Compliance Officer or designee shall ensure a summary of items addressed and actions taken at each Compliance Committee meeting shall be made and retained.

The Compliance Committee shall include, but not be limited to: the Compliance Officer (or Deputy as alternate), Quality Improvement Coordinator, HHSA Program Manager with oversight for Managed Care and Compliance, Adult Services Director (or Deputy as alternate), Children’s Services Director (or Deputy as alternate), the HHSA Privacy Officer and other administrative or fiscal staff as determined by the Compliance Officer. The Compliance Committee shall report to the Health and Human Services Agency Director (as the Mental Health Director). The Compliance Committee shall be chaired by the Compliance Officer or designee. A simple majority of the members present at a meeting shall constitute a quorum for voting purposes. In addition to regularly scheduled meetings, the Compliance Committee Chair shall have the authority to call meetings as needed.

5.0 Attachments

N/A

6.0 Revision History

Date	No.	Action:
05/27/2014	2014-10	Adopted
04/10/2017	2014-10.2	Updated Language



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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, M.P.H., Director
Shasta County Health and Human Services Agency

5/19/17
Date

Tracy Tedder, Compliance Officer
Director, Business & Support Services
Shasta County Health and Human Services Agency

5/23/17
Date