



Health Care Agency Mental Health and Recovery Services Policies and Procedures	Section Name:	Compliance
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	SIGNATURE	DATE APPROVED
Director of Operations Mental Health and Recovery Services	<u>Signature on File</u>	<u>2/15/2023</u>

SUBJECT: Mental Health and Recovery Services Compliance Officer

PURPOSE:

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

POLICY:

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

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

SCOPE:

MHRS County and County Operated providers within the Orange Mental Health Plan (MHP) and Drug Medi-Cal Organized Delivery System (DMC-ODS).

REFERENCES

Mental Health Plan Performance Agreement between DHCS and the County of Orange
Intergovernmental Agreement (IA) for the provision of DMC-ODS services

PROCEDURE:

- I. MHRS Compliance Officer Responsibilities
 - A. Act as the MHRS point person for follow up on compliance issues referred from the Health Care Agency (HCA) Office of Compliance.

- B. Advise the MHRS Deputy Agency Director of compliance issues within MHRS.
- C. Coordinate with appropriate managers and staff within Adult and Older Adult (AOA) and Children, Youth and Prevention (CYP) 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 MHRS 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 MHRS as well as advising and assisting MHRS 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.