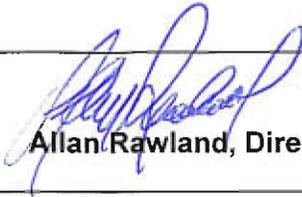


**County of San Bernardino
Department of Behavioral Health**

Compliance Auditing and Monitoring Policy

Effective Date 6/2004
Revision Date 7/31/07



Allan Rawland, Director

Policy It is the policy of the Department of Behavioral Health (DBH) to monitor activities that are subject to regulatory requirements and routinely report findings to the Compliance Committee.

Purpose To ensure that the County of San Bernardino Mental Health Plan (MHP) demonstrates a commitment to the auditing and monitoring component of the Compliance Program Integrity, focusing on employees' and contract providers' conduct and performance regarding services rendered to beneficiaries.

Scope of Audit Audits will be conducted to measure the organization's compliance with laws governing:

- Billing & Coding
- Exclusion list (per OIG)
- Hotline
- Compliance education
- Medical reviews
- Operating licenses, certificates, etc.
- Clinical staff licensure
- Denial reports
- Confidentiality

Note: Additional audits will be conducted to investigate specific concerns identified within the MHP and those that may be identified by an outside agency.

County of San Bernardino

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Monitoring

Monitoring techniques and review process may include:

- Site visits to hospitals or clinics (whether contract, FFS or SD/MC operations)
- Sampling SPM that permit the Compliance Officer or designee to identify and review variations from an established standard
- Evaluating staff competency with regards to accurately denoting authorized DSM-IV/ICD-9 diagnosis and progress notes as these correlate with CDI or other reimbursement activities
- Unannounced mock surveys, audits, and investigations
- Checking personnel records to determine whether any individuals who have been reprimanded for compliance issues in the past are among those currently engaged in improper conduct
- Interviewing personnel involved in management, operations, coding, claim development and submission and other related activities
- Conducting surveys of employees and contract staff
- Reviewing written materials and documentation prepared by the different MHP divisions
- Trend analyses or longitudinal studies that identify positive or negative deviations in specific areas of a specified period

Reference

CFR, Title 42, Volume 3; CFR 438.608
