

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

Compliance Committee

Effective Date 9/18/06
Approval Date 9/18/06



Allan Rawland, Director

Policy

It is the policy of the Department of Behavioral Health to have a Compliance Committee chaired by the Chief Compliance Officer and consisting of senior management representatives from all divisions throughout the Mental Health Plan (MHP).

*Authority cited: Title 42 CFR, Section 438.608, Program Integrity requirements

Purpose

The purpose of the MHP Compliance Committee is to provide organizational support, create department-wide awareness of the Compliance Program, and advise and assist the Chief Compliance Officer, Mental Health Director, and Executive Team on the development and implementation of the Compliance Program.

Rationale

An essential element of an effective compliance program is an active Compliance Committee, comprised of trained representatives of each relevant function area, as well as senior management.

**Compliance
Committee
Members**

Members of the committee will consist of the following staff:

- Chief Compliance Officer/Privacy Officer
 - Medical Director
 - Business Applications Manager
 - Cultural Competency Coordinator
 - Deputy Director, Administrative Services
 - Deputy Director, Adult Services
 - Deputy Director, Alcohol and Drug Services
 - Deputy Director, Children Services
 - Human Resources Officer II
 - Program Manager II, Quality Management
 - Training Coordinator
 - Cultural Competency Consumer and Family Members Committee
 - Association of Community Based Organizations (ACBO)
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Committee Duties

The Compliance Committee duties include:

1. Advise the Chief Compliance Officer regarding the development, implementation, review and evaluation of a comprehensive department compliance program.
2. Provide specialized expertise regarding compliance subject areas.
3. Assist in identifying potential risk areas within committee members' service areas and in developing and implementing compliance policies and procedures resulting from risk assessments.
4. Educate managers and staff on compliance, within their service areas.
5. Assist the Compliance Office in developing and conducting a comprehensive compliance-training program.
6. Provide guidance in the development of written compliance policies and procedures, including the Code of Conduct.
7. Review Department adherence to all laws and regulations that govern the California Department of Mental Health, including the Welfare and Institutions Code and California Code of Regulations (Title 9, Subchapter 4, section 1840.112.)
8. Review Department adherence to policy documents such as the Standard Practice Manual and Mental Health Plan.
9. Provide guidance in the development and maintenance of a confidential employee telephone hotline.
10. Promote employee understanding and support of the Code of Conduct and of confidential reporting of compliance issues.
11. Meet at least quarterly or more frequently if determined to be necessary by the Chief Compliance Officer.

Related Resources/ Regulations

Office Inspector General (OIG) Supplemental Compliance Program Guidance for Hospitals, January 31, 2005; Title 42, Code of Federal Regulations (CFR), Part 438, Section 438.608; Title 9, California Code of Regulations, Section 1840.112
