

 <p style="text-align: center;">County of Sacramento Department of Health Services Division of Behavioral Health Services Policy and Procedure</p>	Policy Issuer (Unit/Program)	QM
	Policy Number	QM-42-01
	Effective Date	10-01-2005
	Revision Date	12-24-2020
Title: Division of Behavioral Health Services Compliance Officer	Functional Area: Designation of a Compliance Officer and a Compliance Committee	
Approved By: (Signature on File) Signed version available upon request Christine Janes, LMFT Compliance Officer, Division of Behavioral Health Services MHDivisionComplianceOfficer@SacCounty.net Alexandra Rechs, LMFT Program Manager, Quality Management Ryan Quist, PHD Deputy Director, Division of Behavioral Health Services		

BACKGROUND/CONTEXT:

The Department of Health Services (DHS) Division of Behavioral Health Services (BHS) Compliance Officer has been delegated authority over the development, operation, and oversight of the BHS Compliance Program. The BHS Compliance Officer (Compliance Officer), with respect to the responsibilities and duties of the Compliance Program, shall report directly to the Deputy Director on matters related to compliance, will have a working relationship with County Office of Compliance, and County Counsel. The Compliance Officer reports annually to the County Compliance Oversight Committee the status of implementation and on-going operations of the BHS Compliance Program for advice and guidance.

PURPOSE:

The position of Compliance Officer is a working (i.e., operating) title within the BHS. It is not a job class established by the Sacramento County Civil Service Commission. The working title of Compliance Officer is used for carrying out the internal affairs of DHS and in correspondence or other outside contacts.

The Compliance Officer contributes to the fulfillment of the BHS’s compliance commitment by planning, designing, implementing, and refining the Compliance Program. This involves developing standards, coordinating compliance training and education, conducting or arranging internal audits, identifying compliance issues and trends, investigating and resolving compliance complaints, and promoting awareness and understanding of the positive ethical and moral practices consistent with the mission and values of the BHS and those required by state and federal law.

DETAILS:

Qualifications:

BHS has established the following qualifications for the person holding the position of Compliance Officer:

Minimum Requirements

- Five years of responsible experience in a supervisory, administrative or managerial capacity working in any of the following areas: Compliance, organizational development, human

resources, quality assurance, quality control, fiscal operations, including at least two years in a health, mental health, or human services agency.

- Possesses a license in good standing with the Board of Behavioral Sciences.
- Has not been found to be in violation of any laws or policy of the BHS.
- Possesses values and principles which are representative of the BHS.
- Understands, accepts and embraces the principles to be achieved with a compliance program for the BHS.

The Ideal Candidate:

- Knowledgeable in areas of compliance, organizational development, quality assurance, and fiscal operations;
- Works collaboratively with other managers and employees to accomplish common goals;
- Has excellent communication skills, both oral and written, and is proficient with a computer;
- Has the demonstrated ability to manage various projects and programs;
- The BHS Deputy Director will carefully consider the qualifications of all potential candidates for the position of Compliance Officer and, only after such careful consideration, will designate the person to serve in that capacity.

Duties:

The Compliance Officer has the following responsibilities:

- Oversee the BHS Compliance Program;
- Advise the BHS Deputy Director, the DHS Director, the County of Sacramento Privacy and Compliance Officer, and the County Compliance Oversight Committee regarding compliance issues including regulatory, fiscal, and operational policies;
- Communicate with BHS Management Team to provide enforcement of BHS policy and operational oversight;
- Maintain a document control system for all reports and operations of the ad hoc BHS Compliance Committee including minutes of meetings, audit and monitoring reports, corrective actions, disciplinary actions, investigations, disclosures, government inspections, training, and education activities;
- Update the BHS Code of Conduct Policy and Procedure as needed, as well as policies and procedures for each operational and administrative component of the BHS Compliance Program;
- Monitor and keep current with laws, regulations, standards, and organizational guidelines;
- Coordinate and participate in a multifaceted educational and training program that focuses on the elements of the Compliance Program and seeks to ensure that all appropriate BHS employees and contractors are knowledgeable of, and comply with, pertinent state and federal standards;
- Assess the need for additional training and education;

- Oversee the “Compliance Hotline” which enables employees and contractors to report violations to the Compliance Officer, without fear of retaliation;
- Ensure that the system is adequately publicized and that allegations of non-compliance are investigated and responded to promptly;
- Arrange and coordinate internal audits for the purpose of monitoring and detecting non-compliance with applicable laws and Compliance Program requirements;
- Enforce the standards and fully investigate possible violations;
- If any non-compliance is detected, ensure that it is investigated, a corrective action is developed and carried out, and that compliance is achieved and sustained;
- Work with Human Resources to ensure a workforce with high ethical standards, including the establishment of minimum standards for conducting appropriate background/reference checks on both potential and existing employees;
- Recommend appropriate consequences for violations of standards;
- Improve the Compliance Program on a continual basis and implement changes on an ongoing basis to improve the prevention/detection of any non-compliance, as well as changes in both the BHS’s needs and state and federal laws;

REFERENCE(S)/ATTACHMENTS:

- Title 42, Code of Federal Regulations, Section 438.608
- California Administrative Code Title 9, Section 1840.112

RELATED POLICIES:

- No. 41-01 Compliance Program
- No. 42-02 Compliance Committee

DISTRIBUTION:

Enter X	DL Name	Enter X	DL Name
X	Mental Health Staff	X	County Counsel
X	Mental Health Treatment Center	X	DHS Deputy Director
X	BHS Adult Contract Providers	X	DHS Human Resources
X	BHS Children’s Contract Providers	X	Management Team
X	Substance Use and Prevention Treatment	X	County of Sacramento Privacy and Compliance Officer

CONTACT INFORMATION:

- Quality Management Information
QMInformation@SacCounty.net