

 <p style="text-align: center;"><b>County of Sacramento</b>  <b>Department of Health Services</b>  <b>Division of Behavioral Health Services</b>  <b>Policy and Procedure</b></p>	Policy Issuer (Unit/Program)	<b>QM</b>
	Policy Number	<b>QM-42-02</b>
	Effective Date	<b>10-01-2005</b>
	Revision Date	<b>12-24-2020</b>
Title: <b>Division of Behavioral Health Services Compliance Committee</b>	Functional Area: <b>Designation of a Compliance Officer and a Compliance Committee</b>	
Approved By: (Signature on File) <b>Signed version available upon request</b>		
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**BACKGROUND/CONTEXT:**

A Department of Health Services (DHS), Division of Behavioral Health Services (BHS) Compliance Committee was created to advise the BHS Compliance Officer and assist in the implementation of the BHS Compliance Program. The BHS Compliance Committee consists of management level representatives from BHS (listed below), and reports compliance issues to the BHS Compliance Officer. The BHS Compliance Committee will meet as issues are identified by the BHS Compliance Officer and as new regulations need to be incorporated into the Compliance Plan.

**PURPOSE:**

The purpose of the BHS Compliance Committee is to provide organizational support, promote BHS-wide awareness of the BHS Compliance Program, and advise the BHS Compliance Officer, the Division Deputy Director, and the County Compliance Oversight Committee on the implementation of the Division Compliance Program.

**DETAILS:**

**Procedure**

The Committee consists of incumbents of the following positions:

- BHS Compliance Officer
- Adult Programs Division Manager
- Children’s Programs Division Manager
- Substance Use, Prevention, and Treatment Division Manager
- Mental Health Treatment Center (MHTC) Manager
- Ethnic Services/Cultural Competence Manager
- Fiscal Services, Manager
- Avatar Fiscal, Manager
- Quality Improvement Program Manager
- HIPAA Deputy Privacy Officer, Division Level

Additionally, incumbents of the following groups/positions serve in an advisory capacity as resources to the Committee upon the Committee's request:

- County Counsel
- Department of Health Services Contracts Unit
- BHS Management Team
- Other BHS Administrative/Program staff

### **Duties**

- Work with appropriate County employees and contractors to review and update the Code of Conduct and other policies and procedures that promote adherence to the BHS Compliance Program annually at minimum;
- Monitor communication methods and training programs to ensure that BHS employees and contractors receive proper and timely information about the Compliance Program, including their duties and responsibilities under it;
- Monitor the system developed to solicit, evaluate, and respond to suspected cases of noncompliance, such as through the Compliance Hotline and other fraud reporting mechanisms;
- Analyze BHS regulatory environment and legal requirements with which it must comply, and identify specific risk areas;
- Assess existing policies and procedures that address these risk areas and incorporate them into the Compliance Program;
- Recommend and monitor, in conjunction with the relevant divisions and departments, the monitoring of internal systems and controls which will ensure that daily operations of BHS meet compliance standards and comply with BHS policies and procedures;
- Determine the appropriate approach to promote BHS compliance with the Compliance Program and to identify control weaknesses;
- Monitor internal and external audits, reviews, and other investigations for the purpose of detecting evidence of deficiencies, and subsequently develop and implement appropriate corrective action and preventive controls;
- Assign duties to individuals and workgroups to ensure implementation of the Compliance Program and maintain an up-to-date listing of the assignment of these duties.

### **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. 42-01 Compliance Officer

**DISTRIBUTION:**

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

**CONTACT INFORMATION:**

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