


LAPEER COUNTY COMMUNITY MENTAL HEALTH

Date Issued 03/30/2010

Date Revised 01/20/12; 05/07/14; 06/26/18; 09/11/18; 05/21/21; 4/21/22

CHAPTER Administrative	CHAPTER 01	SECTION 002	SUBJECT 10
SECTION Operations		DESCRIPTION Corporate Compliance Program	
WRITTEN BY Jackalyn Anderson, M.B.A.	REVISED BY Michelle Gould-Rice, LMSW QI Supervisor	AUTHORIZED BY  Lauren Emmons, ACSW CEO	

APPLICATION:

<input checked="" type="checkbox"/> CMH Staff	<input checked="" type="checkbox"/> Board Members	<input checked="" type="checkbox"/> Provider Network	<input checked="" type="checkbox"/> Employment Services Providers
<input checked="" type="checkbox"/> Employment Services Provider Agency	<input checked="" type="checkbox"/> Independent Contractors	<input checked="" type="checkbox"/> Students	<input checked="" type="checkbox"/> Interns
<input checked="" type="checkbox"/> Volunteers	<input type="checkbox"/> Persons Served		

POLICY:

Lapeer County Community Mental Health (LCCMH) has a formal Compliance Program to prevent and detect fraud, fiscal mismanagement and misappropriation of funds to ensure ongoing monitoring and conformance with all legal and regulatory requirements.

STANDARDS:

- A. LCCMH follows the highest legal and ethical standards of accountability for administration, clinical services, business, marketing and financial management.
- B. LCCMH maintains a corporate compliance program emphasizing the following seven (7) elements of compliance and ethics:
 - 1. Standards of conduct, policies and procedures in place
 - 2. Designation of a compliance officer and committee
 - 3. Communication and education

CHAPTER Administrative	CHAPTER 01	SECTION 002	SUBJECT 10
SECTION Operations		DESCRIPTION Corporate Compliance Program	

4. Internal monitoring and auditing to evaluate program effectiveness and detect criminal conduct
 5. Reporting and investigating- Encourage employees to immediately report questionable activities and practices without consequences to the reporting party (Whistle Blower Protections). Investigative procedures in place.
 6. Enforcement and discipline
 7. Response and Prevention - Timely correction of any situation putting the organization, leadership, staff, funding sources, or persons served at risk and preventing wrong doing, whether intentional or unintentional
- C. The Lapeer County Community Mental Health Services Board (LCCMHSB) delegates overall responsibility for the Corporate Compliance Program to the Chief Executive Officer (CEO).
1. The LCCMH Board Standards Committee is the designated Corporate Compliance oversight committee.
 2. A staff designated by the CEO will serve as the Corporate Compliance Liaison. The Corporate Compliance Liaison reports directly to the CEO on all compliance matters.
 3. The Corporate Compliance Liaison will monitor the organization's Corporate Compliance Program, provide periodic reports to the Board of Directors on matters pertaining to the Corporate Compliance program, and will act as liaison with the Region 10 Prepaid Inpatient Health Plan's (PIHP) Corporate Compliance Committee.

PROCEDURES:

- A. The Corporate Compliance Liaison will:
1. Be familiar with the Corporate Compliance Program as developed by the Region 10 PIHP, including all internal and external monitoring, auditing, investigative and reporting processes, procedures and systems

CHAPTER Administrative	CHAPTER 01	SECTION 002	SUBJECT 10
SECTION Operations		DESCRIPTION Corporate Compliance Program	

2. Serve as the LCCMH primary point of contact for all corporate compliance issues, and act as the organization's liaison with the Region 10 Compliance Committee
 3. Coordinate compliance activities, including reporting on compliance activities and making recommendations to the CEO and the Board of Directors as required
 4. Regularly report compliance activities to the Standards Committee(at least quarterly)
 5. Participate in Corporate Compliance related trainings
 6. Annually, and more frequently when needed, coordinate compliance related training for agency staff and Board of Directors
 7. Prepare, submit and present periodic reports to the CEO and/or Board of Directors as may be required to provide clear communication to the organization's leadership for corporate compliance oversight
- B. The Corporate Compliance Liaison will prepare an annual report of Compliance Activities. The annual report will, at a minimum, include:
1. A summary of all allegations, investigations and/or complaints processed in the preceding twelve months in conjunction with the corporate compliance program
 2. A complete description of all corrective actions taken
 3. Any recommendations for change to the organization's policies and/or procedures
- C. In the performance of their duties, the Corporate Compliance Liaison will have direct and unimpeded access to the organization's CEO, LCCMHSB, and fiscal records for matters pertaining to corporate compliance.

CHAPTER Administrative	CHAPTER 01	SECTION 002	SUBJECT 10
SECTION Operations		DESCRIPTION Corporate Compliance Program	

- D. Reviews of risk areas in the organization will be conducted with LCCMH and by external sources. Such reviews are conducted to ensure ongoing conformance with billing, accounting and collection regulations imposed by the federal government and other "third party" funding sources. These reviews augment the organization's annual audit of its accounting system and provide an additional, internal measure to ensure conformance with billing and coding policies and practice to withstand the scrutiny of any regulatory audit or examination.

MGR

This policy supersedes
#03/10007 dated 03/30/2010.
