

**SWMBH Operating Policy 10.4**

<b>Subject:</b> Compliance Oversight Committee		<b>Accountability:</b> Compliance	<b>Effective Date:</b> 1/1/2014	Pages: 2	
<b>REQUIRED BY:</b> BBA Section _____ PIHP Contract Section _____ NCQA/URAC Standard _____ Other _____			Last Reviewed Date: 10/4/18	Past Reviewed Dates: 1/1/14 5/13/16 5/17/17	
<b>LINE OF BUSINESS:</b> <input checked="" type="checkbox"/> Specialty Waiver (B/C) <input checked="" type="checkbox"/> 1115 Waiver <input checked="" type="checkbox"/> Healthy Michigan <input checked="" type="checkbox"/> SUD Medicaid <input checked="" type="checkbox"/> SUD Block Grant <input checked="" type="checkbox"/> MI Health Link <input type="checkbox"/> OTHER: _____		<b>APPLICATION:</b> <input checked="" type="checkbox"/> SWMBH Staff and Ops <input type="checkbox"/> Participant CMHSPs <input type="checkbox"/> SUD Providers <input type="checkbox"/> MH / DD providers <input type="checkbox"/> Other: _____		Last Revised Date: 10/4/18	Past Revised Dates: 5/13/16 5/17/17
Approved: <i>Mila C. Jodd</i> Date: <i>10-11-18</i>			Required Reviewer: Chief Compliance & Privacy Officer		

**I. Purpose**

Southwest Michigan Behavioral Health (SWMBH) shall maintain a Compliance Oversight Committee (COC) that will advise the Chief Compliance Officer (CCO), Chief Executive Officer (CEO), and SWMBH Board in overseeing the implementation and operation of the Southwest Michigan Behavioral Health Compliance Program. In doing so the COC will review reports and recommendations made by the SWMBH CCO regarding compliance activities. This includes data regarding compliance information and activities generated through audits, monitoring, and individual reporting.

**II. Policy**

Duties and responsibilities of the Oversight Committee shall include the following:

- A. Analyzing the regulatory environment in which the SWMBH organization operates within, the legal requirements with which it must comply and specific risk areas;
- B. Assessing existing policies and procedures that address these areas for possible incorporation into the compliance program;
- C. Working with appropriate departments, as well as participant providers, to develop standards of conduct and policies and procedures that promote allegiance to SWMBH's compliance program;
- D. Recommending and monitoring, in conjunction with the relevant functional area leaders, the development of internal systems and controls to carry out SWMBH's standards, policies and procedures as part of its daily operations;
- E. Determining the appropriate strategy/approach to promote compliance with SWMBH's compliance program and detection of any potential violations, such as through hotlines and other fraud reporting mechanisms;
- F. Developing a system to solicit, evaluate and respond to complaints and problems; and
- G. Monitoring internal and external audits and investigations for the purpose of identifying troublesome issues and deficient areas experienced by SWMBH and implementing corrective and preventive action.

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The Compliance Oversight Committee may also address other functions as the compliance program becomes part of the overall operating structure and daily routine.

### **III. Standards and Guidelines**

The Compliance Oversight Committee will be chaired by the Chief Compliance Officer. It is the policy of SWMBH that the Compliance Oversight Committee be comprised of additional individuals with varying responsibilities within the organization, including but not limited to operations, finance, human resources, utilization review, claims processing, information systems, legal, one participant provider representative as well as employees and managers of key functional units. These individuals should have the requisite seniority and comprehensive experience within their respective functional areas to implement any necessary changes in SWMBH's policies and procedures. Compliance Oversight Committee members should demonstrate high integrity, good judgment, assertiveness and an approachable demeanor, while eliciting the respect and trust of the employees of the organization.

### **IV. Definitions**

None

### **V. References**

42 CFR, Ch. IV §438.608 and Federal Register Volume 64, No. 219

### **VI. Attachments**

None