




Section: Compliance	Policy Name: Compliance Oversight Committee	Policy Number: 10.04
Owner: Chief Compliance Officer	Reviewed By: Mila C. Todd	Total Pages: 4
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Application: <input checked="" type="checkbox"/> SWMBH Staff/Ops <input type="checkbox"/> Participant CMHSPs <input type="checkbox"/> SUD Providers <input type="checkbox"/> MH/IDD Providers <input type="checkbox"/> Other (please specify): _____	Line of Business: <input checked="" type="checkbox"/> Medicaid <input type="checkbox"/> Other (please specify): <input checked="" type="checkbox"/> Healthy Michigan <input checked="" type="checkbox"/> SUD Block Grant <input checked="" type="checkbox"/> SUD Medicaid <input checked="" type="checkbox"/> MI Health Link	Effective Date: 01/01/2014

Policy: 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 SWMBH 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.

Purpose: The purpose of this policy is to articulate the responsibilities of the Compliance Oversight Committee.

Scope: SWMBH Chief Compliance Officer; SWMBH Program Integrity & Compliance Department; SWMBH Compliance Oversight Committee

Responsibilities:

SWMBH’s Chief Compliance Officer is responsible for providing updates and recommendations to the Compliance Oversight Committee regarding SWMBH’s compliance program functions.

SWMBH personnel appointed to the Compliance Oversight Committee are responsible for adhering to this policy.

Definitions: None.



Standards and Guidelines:

A. Committee Members

- a. 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.

B. COC Duties and Responsibilities

- a. Analyzing the regulatory environment in which SWMBH operates, 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;
- 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; and
- h. Any other functions the COC determines relevant and necessary to support the successful operation of SWMBH's compliance program.



References:

42 CFR §438.608

Federal Register Volume 64, No. 219

Attachments:

None.

10.04 Compliance Oversight Committee

Final Audit Report

2023-03-31

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