



YOLO COUNTY
ALCOHOL, DRUG AND MENTAL HEALTH DEPARTMENT
POLICY AND PROCEDURES MANUAL

SUBJECT: Compliance Program Standards

POLICY

The mission of the Yolo County Alcohol, Drug & Mental Health Department (ADMH) is to enable individuals in our community who are affected by mental illness and serious emotional disturbances to achieve the highest quality of life. To accomplish this goal, services must be delivered in the least restrictive, most accessible environment within a coordinated system of care that is respectful of a person's family, language, heritage and culture. Services must also be provided in an ethical and honest manner.

To achieve these objectives, ADMH has implemented a Compliance Program, established by federal Medicaid Managed Care Regulations and monitored by the California Department of Mental Health. The implementation of the Compliance Program is evidence of the department's continuing effort to improve quality of care in an environment that promotes integrity, ethical conduct and adherence to applicable laws and professional standards.

PROCEDURE

A. Compliance Plan

As a component of the broader Compliance Program, ADMH has designed processes for combating fraud and unethical conduct through the development of the ADMH Compliance Plan. The Compliance Plan details the department's commitment to achieve and maintain compliance with all applicable state and federal standards. The components of the Plan will serve as guidelines for delivering services in a manner consistent with the highest professional standards and ethical code of conduct.

The Compliance Plan addresses the following issues:

1. Conducting internal monitoring and auditing through the performance of periodic audits to ensure that we do not fail in our efforts to adhere to all applicable state and federal laws and regulations;
2. Implementing compliance and practice standards through the development of written standards and procedures;
3. Designating a Compliance Officer to monitor compliance efforts and enforce practice standards;
4. Conducting appropriate training and education on practice standards and

procedures regarding applicable laws, regulations, and policies;

5. Establishing mechanisms to investigate, discipline, and correct non-compliance and respond appropriately to detected violations through the investigation of allegations and the disclosure of incidents to appropriate government entities;

6. Developing open lines of communication, including discussions at staff meetings regarding how to avoid erroneous or fraudulent conduct; establishing internal bulletin boards and memos for dissemination of new or changed information to keep employees updated on compliance activities; and providing clear and ethical business guidelines for staff to follow; and

7. Enforcing disciplinary standards through well-publicized guidelines.

B. Practice Standards

The Compliance Plan establishes specific practice standards which have been implemented through several policies and procedures and are monitored by various internal activities. These Compliance Policies and Procedures reduce the possibility of erroneous claims and fraudulent activities by identifying risk areas and establishing internal controls to counter those risks. These practice standards address client care, personnel matters and compliance with federal and state law.

C. Employee Participation

The key to achieving compliance is employee participation and support. Each ADMH employee is expected to be familiar with the Compliance Plan and the appropriate processes necessary to perform his/her duties, and/or how to obtain the requisite information pertinent to performing his/her duties, in a manner consistent with legal, regulatory, and departmental requirements. Employees who act in violation of the Compliance Plan or who otherwise ignore or disregard the standards of ADMH may be subjected to progressive disciplinary action up to and including termination.

D. Standards of Ethical Conduct

As outlined in the Compliance Plan, ADMH expects that all personnel will conduct themselves in a manner consistent with the professional standards of their profession. ADMH places great importance on its reputation for honesty and integrity. To that end, ADMH expects that the conduct of employees will comply with these ideals.

As ADMH pursues its mission, each employee shall:

1. Conduct all business activities in an ethical and law-abiding fashion, and
2. Maintain a service culture that builds and promotes the awareness of compliance.

E. Code of Conduct

In an effort to clearly define the expectations of ADMH staff, the department has developed a written Code of Conduct. This document will be distributed to all employees of the department for review.

1. Each staff member shall be required to sign an acknowledgement that he/she has received and read a copy of the Code of Conduct. This acknowledgement will be

maintained in a file with County HR and the ADMH Compliance Officer.

2. As a standard component of new employee orientation, employees will receive the Code of Conduct. In addition, the new employee will be required to sign an acknowledgement that he/she has received and reviewed the Code of Conduct.

3. This acknowledgement form shall be re-signed after reviewing the ADMH Code of Conduct on an annual basis.

REFERENCES

None.

APPROVED BY:

ADMH Director

Date