



# COUNTY OF YOLO

## HEALTH AND HUMAN SERVICES AGENCY

### POLICIES AND PROCEDURES

#### SECTION 5, CHAPTER 4, POLICY 015

#### BEHAVIORAL HEALTH COMPLIANCE TRAINING

- A. PURPOSE:** To establish guidelines and requirements for the Yolo Health and Human Services Agency (HHSA) Behavioral Health Compliance Program ("Compliance Program") for behavioral health employees.
- B. FORMS REQUIRED/ATTACHMENTS:** None/Not applicable
- C. DEFINITIONS:**
- 1. Compliance Training:** Multifaceted education and training that focuses on the elements of a compliance program, and seeks to ensure that behavioral health employees, are knowledgeable and comply with pertinent federal, State, and County rules, regulations, statutes, policies, and procedures. Such training may also include areas of operation within HHSA behavioral health programs may be high risk and potentially subject to audit exceptions.
  - 2.** See HHSA PP 5-4-007 *Implementation of the Behavioral Health Compliance Program* for additional definitions related to the Compliance Program.
- D. POLICY:** Compliance education and training is an important component of the Compliance Program. All HHSA behavioral health employees are expected to be familiar with the Compliance Plan and the appropriate processes necessary to perform his or her duties and how to obtain the requisite information in order to perform those duties in a manner consistent with legal, regulatory, HHSA and County requirements. The Compliance education and training seeks to assist behavioral health employees with this expectation and is mandatory. Behavioral Health employees who act in violation of the Compliance Plan or who otherwise ignore or disregard the standards of HHSA or the County may be subjected to progressive disciplinary action up to and including termination.
- E. PROCEDURES:**
- 1.** The Behavioral Health Compliance Officer ("Compliance Officer") shall be responsible for developing, implementing, evaluating, and maintaining a compliance-training program for the Compliance Program for behavioral health employees.

The Compliance Officer may consult with or obtain assistance from HHSA Human Resources, the Behavioral Health Compliance Committee ("Compliance Committee"), the Behavioral Health Quality Management (QM) Program ("QM Program"), or other available resources, as needed.

2. Participation in compliance trainings shall be tracked via sign-in sheets; via online software applications, or via the Compliance Training log maintained by the Compliance Officer. This log provides information on the date of the training, names of attendees, type and topics of training, location of the training, trainer's name(s), duration of the training.
3. Annual Training: Annually, behavioral health employees will be expected to attend a compliance training in person or online, if available. New behavioral health employees are trained as soon as possible after their start date and all behavioral health employees receive refresher training on an annual basis, or as appropriate. Training topics may include, but are not be limited to:
  - a. The elements of an effective compliance program.
  - b. The false claims act and non-retaliation provisions.
  - c. Appropriate behaviors in the work place.
  - d. How to report an alleged compliance violation.
4. Ongoing Staff Trainings: Periodically, the completion of additional trainings may be necessary to reduce audit exceptions and/or risk to HHSA. For example, an audit or monitoring tool may expose an area of weakness within the HHSA behavioral health programs and a training will be conducted to reduce future risk in that area.
5. Training Efficiency: Surveys, testing, or email vignettes may be used to measure the effectiveness of the training sessions.
6. Ongoing Communication: To regularly communicate new compliance information and to assure that behavioral health employees receive the most recent information, the Behavioral Health Compliance Officer, Behavioral Health Compliance Committee or the Behavioral Health Quality Management Program will utilize the following communication mechanisms:
  - a. Internal Memos;
  - b. Informational notices,
  - c. E-mail;
  - d. Ongoing trainings;
  - e. Other reasonable methods.
7. Training for the Compliance Officer: HHSA will dedicate resources to provide ongoing training for the Compliance Officer. Trainings may include but are not limited to attendance at topically relevant training conferences, organizational meetings, and/or webinars.


**F. REFERENCES:**

1. Title 42, Code of Federal Regulations (CFR), Sections 438.608 and 455.2.
2. Yolo County's Mental Health Plan (MHP) Contract with the DHCS, Program Integrity Requirements

3. DHCS Program Oversight and Compliance Annual Review Protocol for Specialty Mental Health Services and Other Funded Services, Section H, Program Integrity
4. HHSA Behavioral Health Code of Conduct

Approved by:

  
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Karen Larsen, Director  
Yolo County Health and Human Services Agency

  
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Date