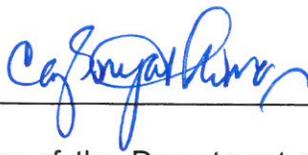


County of San Bernardino Department of Behavioral Health

DBH Compliance Committee

Effective Date
Revised Date

09/18/06
12/15/14



CaSonya Thomas, Director

Policy

It is the policy of the Department of Behavioral Health (DBH) to have a Compliance Committee chaired by the Chief Compliance Officer and comprised of executive, senior management and/or designated representatives from clinical and administrative divisions throughout the Department that is dedicated to maintaining an open and ethical workplace.

Purpose

The purpose of the DBH Compliance Committee is to dedicate, promote and maintain a safe, transparent and ethical workplace where best practices regarding ethics, compliance and integrity are developed and implemented throughout the Department.

**Compliance
Committee
Members**

Members of the committee will consist of executive, senior management and/or designated representatives who represent his/her respective clinical or administrative program. An essential element of an effective compliance program is an active Compliance Committee, comprised of trained and knowledgeable members who serve in an advisory capacity to the Office of Compliance and are an extension of Compliance.

To ensure the department is represented throughout the organization, the following DBH and County staff are members of the Committee:

- DBH Director
 - DBH Assistant Director
 - DBH Chief Compliance Officer/Privacy Officer
 - DBH Ethics and Compliance Coordinator
 - DBH Medical Director
 - DBH Deputy Director, Administrative Services
 - DBH Deputy Director, 24-Hour, Emergency and Adult System of Care Services
 - Human Resources Officer
 - DBH Deputy Director, Children Services
 - DBH Deputy Director, Program Support Services
 - DBH Deputy Director, Regional Operations
 - DBH Cultural Competency Officer
 - DBH Business Applications Manager/Security Officer
 - DBH Chief Quality Management Officer
 - DBH Administrative Manager, Workforce Education and Training
 - County Ethics & Compliance Office representative
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County of San Bernardino

Department of Behavioral Health

DBH Compliance Committee, Continued

Committee Duties

The Compliance Committee duties include:

- Assist the Chief Compliance Officer regarding the development, implementation, review and evaluation of a comprehensive department compliance program.
- Provide specialized expertise regarding compliance subject areas.
- Assist in identifying potential risk areas within committee members' service areas and in developing and implementing compliance policies and procedures resulting from risk assessments.
- Educate managers and staff on compliance, within their program.
- Assist Compliance with developing and conducting a comprehensive compliance-training program.
- Provide guidance in the development of written compliance policies and procedures, including the Code of Conduct.
- Review Department adherence to applicable laws, regulations and State agreements.
- Review Department adherence to policy documents such as the Standard Practice Manual and Code of Conduct.
- Report out on matters regarding complaints received on the confidential employee telephone hotline.
- Promote employee understanding and support of the Code of Conduct and of confidential reporting of compliance issues.
- Meet at least quarterly or more frequently if determined to be necessary by the Chief Compliance Officer.
- Support Compliance monitoring and investigative efforts.
- Report to Compliance any non-compliant actions identified within DBH or its contractors.
- Assist in identifying topics for the quarterly compliance meetings with contract agencies.
- Provide feedback to the Office of Compliance on the effectiveness and efficiency of its activities/products.
- Offer recommendations to the Office of Compliance regarding identified or needed ethics and compliance activities/actions.
- Disseminate agreed upon best practices regarding ethics, compliance and integrity.
- Conduct ethics and compliance activities at program level.
- Participate in appropriate compliance activities.

References

California Code of Regulations, Title 9, Section 1840.112
Code of Federal Regulations (CFR), Title 42, Section 438.608;
Office Inspector General (OIG) Supplemental Compliance Program
Guidance for Hospitals, January 31, 2005;
Patient Protection and Affordable Care Act, Public Law 111-148
