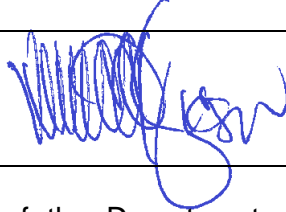


**County of San Bernardino
Department of Behavioral Health**

Compliance Verification, Monitoring and Auditing Policy

Effective Date 06/2004
Revision Date 02/26/2018



Veronica Kelley, LCSW Director

Policy

It is the policy of the Department of Behavioral Health (DBH) to verify licensure/waiver/registration/certification status, conduct monitoring and perform auditing activities, to ensure program integrity and compliance of Department, County, State and Federal standards, contracts, laws and regulations.

Purpose

To ensure the San Bernardino County Mental Health Plan (MHP) conducts the required licensure/waiver/registration/certification verification, and monitoring and auditing practices, as required by the U.S. Office of Inspector General (OIG) and the California Department of Health Care Services (DHCS). Verification activities ensure treatment providers maintain appropriate licensure, waiver, registration, and/or certification status and have no restrictions within their scope of practice; monitoring assists in evaluating employee and contract agency conduct; auditing activities assess appropriateness of service delivery and documentation; and overall allow for responses to reported, suspected and/or actual fraud/waste/abuse, workforce misconduct and other non-compliant matters.

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Compliance Verification, Monitoring and Auditing Policy, Continued

**License/Waiver/
Registration/
Certification
Verification**

The following requirements apply to DBH and DBH contract agencies:

Responsible Party	Requirement
DBH/Contractor Employment Candidate	Provide copy of current license/waiver/registration/certification prior to employment.
DBH/Contractor Hiring Program/Division	Verify license/waiver/registration/certification is current with no restrictions during selection process and at hire.
DBH/Contractor Human Resources/Payroll	Collect copy of employee license/waiver/registration/certification and verify current status with no restrictions at the time of hire.
DBH Office of Compliance	<ul style="list-style-type: none"> • Verify license/waiver/registration/certification is current with no restrictions prior to approval to bill for services, upon Medi-Cal certification and recertification. • Verify potential contract agencies provide proof (prior to contract signing) they verify license/waiver/registration/certification is current with no restrictions during selection process and at hire of staff.
DBH Quality Management/Program and Substance Use Disorder and Recovery Services (SUDRS)	<ul style="list-style-type: none"> • Conduct license/waiver registration/certification verification prior to Medi-Cal certification and re-certification to ensure current status with no restrictions. • Maintain proof license and waiver registration/certification check completion at the certification or re-certification.

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Monitoring

Monitoring and review practices may include, but will not be limited to:

- Site visits (DBH offices/clinics, contract agencies, FFS and/or SD/MC operations, hospitals, etc.).
- Assessments of policy/procedure implementation to evaluate compliance and identify variations from established standard(s).
- Evaluation of staff competency and accuracy pertaining to denotation of Diagnostic and Statistical Manual (DSM) of Mental Disorders – Fifth Edition diagnosis, progress notes and other documentation correlated with Charge Data Invoice or other reimbursement activities.
- Announced and unannounced surveys, visits, reviews, and investigations, including reviews of written materials and correspondences.
- Reviewing hotline report use and/or trends.
- Review of personnel records and other pertinent records to investigate improper conduct.
- Conduct assessments through surveys and other methods to identify employee and contractor staff trends and/or deficiencies.
- Trend analyses and studies to identify positive/negative deviations.

Note: SUDRS utilizes the DSM of Mental Disorders Third Edition- Revised, Fourth Edition or Fifth Edition.

Auditing

Audits will be conducted to measure the Department's compliance with standards, policies, laws and regulations governing:

- Billing & coding
 - Sanction screenings and exclusion checks
 - Medical reviews
 - Clinical staff licenses, waivers, registrations, certificates, etc.
 - Denial reports
 - Compliance, confidentiality and privacy requirements
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**County of San Bernardino
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Continued

Reference

- California Department of Health Care Services, Specialty Mental Health Contract
- California Department of Health Care Services Revenue Agreement for Substance Use Disorder Services
- Code Federal Regulations, Title 42, Chapter IV, Section 438.608.
- Office of Inspector General: Compliance Program Guidance and Supplemental Program Guidance for Hospitals, January 31, 2005

**Related
Policies and
Procedures**

DBH Standard Practice Manual:

- COM014: [Code of Conduct](#)
 - COM0934: [Compliance Plan Policy](#)
 - COM0933: [Ineligible Persons Policy](#)
 - HR4011: [Waiver for Pre-Licensed/Out of State Licensed Ready Psychologists](#)
 - HR4012: [Registration and Licensure Requirements for Pre-Licensed Clinical Therapists Policy](#)
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