

COUNTY OF IMPERIAL
DEPARTMENT OF BEHAVIORAL HEALTH SERVICES

POLICY AND PROCEDURE MANUAL

SUBJECT: Compliance Officer	POLICY NO: 01-106
SECTION: Administration	EFFECTIVE DATE: 11-6-17
REFERENCE: CFR, Title 42, § 438.608	PAGE: 1 of 3
AUTHORITY: Behavioral Health Director as the Local Mental Health Director and Alcohol and Drug Administrator	SUPERSEDES: 5-18-16
	APPROVED BY: <i>Andrea Kuhlert</i>

PURPOSE: To establish a policy regarding the responsibilities of the Imperial County Behavioral Health Services (ICBHS) Compliance Officer.

NOTES: None

DEFINITIONS: ICBHS: Imperial County Behavioral Health Services

POLICY: The Compliance Officer shall give his or her duties first priority and will ensure that all other duties are secondary to his or her responsibilities. The Compliance Officer will be a member of senior management appointed by the ICBHS director. ICBHS has established the following guidelines and responsibilities as being appropriate for the person holding the position of Compliance Officer:

- The Compliance Officer shall be responsible for overseeing, coordinating and developing the Compliance Program
- The Compliance Officer will report directly to the ICBHS Director.
- The Compliance Officer is responsible for evaluating and monitoring the effectiveness of the Compliance

Program periodically as appropriate.

- The Compliance Officer shall oversee the development, maintenance, and implementation of all compliance policies, procedures, and forms and practices as needed to ensure compliance with all Federal and state regulations, and requirements of the State-County intergovernmental agreement.
- The Compliance Officer shall be responsible for chairing the Compliance Committee.
- The Compliance Officer shall advise the Compliance Committee regarding compliance issues.
- The Compliance Officer shall be responsible for obtaining feedback from the Compliance Committee regarding compliance issues to ensure the Compliance Program accurately reflects the operating realities of the department.
- The Compliance Officer shall ensure all ICBHS staff and contract providers receive proper and ongoing compliance trainings and education to ensure they are knowledgeable of, and comply with, pertinent state, federal, and county regulations, and required mandates.
- The Compliance Officer shall ensure he or she attends compliance workshops and trainings to remain current on all applicable changes.
- The Compliance Officer shall be responsible for a document control system for all reports and operations of the Compliance Committee including minutes of meetings, audit and monitoring reports, corrective actions, disciplinary actions, investigations, disclosures, government inspections, training and education activities.
- The Compliance Officer shall be responsible for implementing and maintaining an effective reporting program, including promoting the use of the Compliance Hotline, that allows the employee to report an alleged violation without fear of retaliation.
- Compliance Officer shall be responsible for overseeing that all potential areas of risk and/or concern are identified and addressed.
- The Compliance Officer is responsible for ensuring internal

audits for the purpose of monitoring and detecting non-compliance with applicable laws and the Compliance Program requirements.

- The Compliance Officer shall be responsible for ensuring that any non-compliance is investigated and that a corrective action plan is developed and carried out.
- The Compliance Officer shall monitor and keep current with all applicable laws, regulations, rules, guidelines and ICBHS processes.
- The Compliance Officer shall coordinate with various county departments including Human Resource and Risk Management, County Counsel, Auditor Controller, etc., as applicable, and outside agencies to ensure ICBHS remains in compliance with all state, federal, and county regulations, and required mandates.