



Policy:	03-16
Subject:	Compliance Committee
Authority:	42 CFR (438.608) Managed Care Regulations, Program Integrity. Contracts with Department of Health Care Services for: Mental Health, SUDS, and DMC; Center for Medicaid & Medicare (Chapter 21 - Compliance Program Guidelines and Prescription Drug Benefit Manual Chapter 9 - Compliance Program Guidelines); BHRS Compliance Program.
Original Policy Date:	December 1, 2003
Amended:	Amended and Renamed August 29, 2016; Technical Edit June 14, 2024
Supersedes:	N/A
Attachments:	Attachment A: Compliance and Delegation Oversight Committee Charter

PURPOSE

The purpose of the Compliance and Delegation Oversight Committee is to promote understanding and adherence to the Behavioral Health and Recovery Services (BHRS) Compliance Program and to advise the Compliance Officer on the development and implementation of the Compliance Plan.

POLICY

It is the policy of BHRS to ensure that all of the Division’s operations are in full compliance with Federal and State laws and regulations.

The Compliance and Delegation Oversight Committee is responsible for overseeing the Compliance Program, subject to the direction of the BHRS Director and the ultimate authority of BHRS. The Compliance and Delegation Oversight Committee is chaired by the Compliance Officer and meets on at least a quarterly basis. The Compliance and Delegation Oversight Committee Charter identifies the responsibilities and membership of the Committee. BHRS maintains written minutes (as appropriate) of Compliance and Delegation Oversight Committee meetings reflecting the reports made to the Committee and the Committee’s decisions on relevant issues (subject to applicable legal provisions concerning confidentiality.)

PROCEDURE/PROTOCOL

- The Compliance and Delegation Oversight Committee shall be appointed by, and be accountable to, the BHRS Director in consultation with the Compliance Officer.
- The committee shall meet at least quarterly, or more frequently at the direction of the Compliance Officer.



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- A simple majority of the membership constitutes a quorum. The chair or the chair's designee must be present for the quorum to be in effect.

RESPONSIBILITIES:

- The Compliance and Delegation Oversight Committee has the following responsibilities:
 - Analyze and understand the regulatory environment, legal requirements and specific risk areas within which BHRS operates.
 - Identify existing policies and procedures that address these areas.
 - Develop, in conjunction with the Quality Improvement Committee, standards of conduct and additional policies and procedures that promote adherence to the BHRS Compliance Program and detection of potential violations.
 - Recommend and monitor, in conjunction with appropriate staff and/or external resources, the development of internal systems and controls to carry out BHRS compliance standards, policies and procedures as a part of daily operations or as may be needed to achieve compliance with subcontractors.
 - Assist the Compliance Officer in the development of a training plan to update all staff on standards of conduct, compliance related policies and procedures, and fraud, waste, and abuse.
 - Monitor internal and external audits and investigations to identify deficit areas and to implement corrective and preventive action.
 - Review and update the Compliance Plan annually.
- Reporting responsibilities:
 - The Compliance and Delegation Oversight Committee will update the San Mateo County Board of Supervisors as needed or requested.
 - The Compliance Officer shall report the work of the Compliance and Delegation Oversight Committee to the BHRS Director. Timely reports shall note implementation of processes to improve compliance and/or to mitigate discovered errors, and any other significant efforts to reduce risk

MEMBERSHIP:

- The membership of the Compliance Delegation and Oversight Committee shall include:
 - Compliance Officer (Chair)
 - BHRS Director
 - BHRS Medical Director
 - Financial Services Managers
 - Quality Management Manager
 - Deputy Director for Adult Services
 - Deputy Director for Youth Services



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- Deputy Director for AOD
- County Counsel
- Forensics Services Manager

On an 'as needed' basis the following will be asked to attend:

- Health Services Director of Finance and Administration – as indicated
- Pharmacy Services Manager – as indicated
- Contracts Manager – as indicated

Additional members may be appointed as appropriate.

Approved: _____
Signature on File
 Scott Gruendl, MPA
 Compliance Officer

Approved: _____
Signature on File
 Dr. Jei Africa, PsyD, FACHE
 BHRS Director

ANNUAL REVIEW OF COMPLIANCE POLICY			
Next Review Due:	June 2025		
Last Reviewed by:	Scott Gruendl, Compliance Officer	Date:	6/14/24