

MESSAGE FROM THE DIRECTOR

To: All San Mateo County Behavioral Health Services Division Staff
and Contractors

From: Stephen Kaplan, LCSW, BHRS Director

Date: August 29, 2016

Subject: Compliance Program

In the delivery of our services we share values of service excellence, integrity and accountability. We have adopted a shared mission and values reflective of our understanding of the responsibilities we bear as providers of publicly funded services. Additionally, BHRS staff and community provider agencies are committed to upholding county as well as professional codes of ethics. BHRS is now expected and required as a "behavioral health plan" receiving federal funds to comply with extensive new Managed Care requirements that include a Compliance Plan that incorporates a written Code of Conduct. While we have adopted this Compliance Plan to comply with federal and state regulations, the Compliance Plan reflects values we have always held as an organization. These appear in the Compliance Plan and include *"commitment to clinical and service excellence"* and *"commitment to accountability for wise and cost effective use of resources with measurable results."*

It has been my experience that our staff and contractors are extraordinarily dedicated to the work that they do. However, we also must be diligent about making sure that we are completely aware of the rules and regulations that govern us. Mistakes in documentation and billing may be interpreted as "fraud and abuse" on the part of the organization. Therefore, we must be vigilant in complying with Medicaid and Medicare regulations. Alert your supervisor, manager or the Compliance Officer of mistakes once discovered. Failure to comply with rules and regulations including those related to documentation and submission of claims means that billing must be blocked and/or payments returned. In the worst-case scenarios, failure to comply with federal regulations may result in fines and even criminal prosecution.

For the foreseeable future you will notice an increase in policies, procedures, and training about the work that you do and how you document what you do. Compliance trainings are available at <http://www.smchealth.org/bhrs/providers/ontrain> and may be taken at any time. If you do not understand any of these requirements as they apply to your work, you are expected to ask for help. Your individual initiative is critical to our ability as an organization and system of care to comply with complex regulations in a behavioral health system that is also complex, involving many people, functions and procedures. It is important that you also feel free to raise questions and make suggestions for improvement. This is truly a situation in which there are no "dumb



questions” or suggestions. It will take all of us working together to meet the demands of these Federal requirements. We are certainly called upon to walk the talk of our “*commitment to function as a learning organization dedicated to ongoing training, development and support of staff, providers, consumers and family members; recognizing the essential role of these stakeholders in our organization’s effectiveness*” (Mission/Vision Statement).

System-wide implementation of our Compliance Plan and the new Managed Care regulations is daunting and will take a sustained focus by BHRS staff and providers. Our collective challenge is to address compliance/regulatory demands while sustaining our commitment to serving our clients. It won’t be easy but I am confident that we can do it.



Stephen Kaplan, LCSW
BHRS Director

