



Shasta County Health and Human Services Agency Managed Care, Compliance & Quality Management

Compliance as an Element of Performance

1.0 **Persons/Programs Affected** *(Check all that apply)*

<input checked="" type="checkbox"/> All Staff	<input type="checkbox"/> All Managers	<input type="checkbox"/> All Supervisors	

*Each branch to have unique Persons/Programs Affected

*All employees include all employees—full-time, part-time and extra-help.

2.0 **Definitions**

Compliance Officer means the person designated by the Mental Health Director and is delegated authority for the implementation, administration, and oversight of the Compliance Program. The Compliance Officer has the authority for and may delegate responsibility for development and day-to-day operations of the Compliance Program.

Compliance Program means the internal policies, procedures and processes designed by the Shasta County Health and Human Services Agency (HHSA) to ensure federal, state and local rules, laws and regulations are met. The Compliance Program is designed to prevent fraud, waste and abuse, and prevent and detect violations of any statute, regulation or guideline applicable to federal health care programs in the conduct of operations by employees and other covered entities/individuals.

3.0 **Policy**

The HHSA, through its Mental Health Managed Care Plan (MHP), ensures that employees follow all Compliance Program policies and procedures to the best of their ability. Actions shown to be willfully ignoring established policies and procedures will be subject to discipline according to Shasta County Personnel Rules and/or employee’s bargaining unit Memorandum of Understanding. Managers and supervisors are responsible for detecting possible compliance issues and reporting them to the Compliance Officer or designee. Managers and supervisors will be subject to discipline for failure to adequately instruct their subordinates or for failing to detect noncompliance with applicable Compliance Program policies and procedures. Applicable Compliance Program policies and procedures are available on the Intranet at: <http://intranet/hhsa/Compliance.aspx>.

The promotion of, and adherence to Compliance Program related policies and procedures is a factor in evaluating the performance of all employees, contractors and agents of Shasta County. Employees will be periodically trained regarding these policies and



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procedures, and any new Compliance Program policies and procedures that are established.

4.0 Procedure

The Compliance Officer or designee will ensure initial and annual Compliance Program training to all MHP employees (See Compliance Education and Training Program Policy and Procedure).

All managers and supervisors are required to comply with the following:

- Discuss the Compliance Program policies and procedures and legal requirements with all supervised personnel and all contractors and agents utilized, which are applicable to their job function;
- Inform all supervised personnel that strict compliance with Shasta County Compliance Program policies and procedures is a condition of continued employment;
- Review employee adherence to the Compliance Program policies and procedures and legal requirements, which are applicable to their job, yearly, as a Core Competency in their annual performance evaluation;
- Disclose to all supervised personnel that disciplinary action, in compliance with Shasta County Personnel Rules and/or employee's bargaining unit Memorandum of Understanding, will be taken, up to and including termination or revocation of employment, for violation of Compliance Program policy and procedures.

5.0 Attachments

N/A

6.0 Revision History

Date	No.	Action:
05/27/2014	2014-12	Adopted
04/10/2017	2014-12-2	Updated language

7.0. Other Agency Involvement

N/A



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8.0 Authorization/Signatures

The above policy and procedure has been reviewed and is authorized for immediate implementation:

Donnell Ewert, M.P.H., Director
Shasta County Health and Human Services Agency

Date

5/16/17

Tracy Tedder, Compliance Officer
Director, Business & Support Services
Shasta County Health and Human Services Agency

Date

5/16/17