

**VAN BUREN COMMUNITY MENTAL HEALTH AUTHORITY
POLICIES & PROCEDURES**

Title: Corporate Compliance
Originated: March 30, 2010

Number: I.33
Approved By: Board
Reviewed By: Executive Team

POLICY:

Van Buren Community Mental Health Authority (VBCMHA) is committed to conducting itself in accordance with the highest standards of business ethics and integrity and in compliance with all applicable federal and state laws, regulations, and legal standards. For this reason, a Corporate Compliance Plan has been written, a Corporate Compliance Officer has been appointed, and a Compliance Committee has been established and charged with the responsibility to formalize and monitor VBCMHA's Compliance Procedures to ensure that all VBCMHA directors, officers, managers, employees, independent contractors, agents, and volunteers ("VBCMHA Personnel") conduct themselves on behalf of VBCMHA in the highest ethical manner.

Compliance Plan: The formal Compliance Plan will be distributed and available for review by all VBCMHA personnel. At all times, VBCMHA personnel will be trained regarding the Compliance Plan and will be expected to adhere to the principles, standards, and procedures described in the Compliance Plan.

Procedures: All VBCMHA Personnel are responsible for reviewing and adhering to the principles, standards, and procedures that comprise the Compliance Plan, and to the principles, standards, policies and procedures included in the existing Van Buren Community Mental Health Authority Policy and Procedure Manuals. All VBCMHA Personnel will receive annual Compliance training.

DEFINITION(S):

State Laws and Regulations: Michigan Mental Health Code and Administrative Rules; other statutes related to municipal organizations and operations and Social Welfare Act.

Federal Laws and Regulations: Social Security Act (Title XIX-Medicaid); Balance Budget Act of 1997; Code of Federal Regulations; State Operation Manual; Letter to State Medicaid Directors; Technical Assistance Tools (Quality Improvement Systems for Managed Care; Guide to Encounter Data Systems); Office of Management and Budget Circulars; Government Accounting Standards Board; Health Insurance Portability and Accountability Act of 1996; False Claim Act; Provisions from Public Act 368 of 1978, revised, Article 6 Substance Abuse.