


CHAPTER: 9	SECTION: 17	SUBJECT: <b>HUMAN RESOURCES</b>
TITLE: <b>CORPORATE COMPLIANCE</b>		
EFFECTIVE DATE: <b>5/12/03</b>	REVISED/REVIEWED DATE: <b>12/20/05, 10/03/06, 02/05/08, 2/17/10, 3/25/13, 3/17/14, 6/12/15, 4/21/16, 5/1/17, 7/13/18, 9/5/19, 10/01/20, 01/03/23</b>	
ISSUED AND APPROVED BY:   <p style="text-align: center;">EXECUTIVE DIRECTOR</p>		

**I. PURPOSE:**

CMHOC will develop and manage a Compliance Program that addresses all required elements of an effective compliance program as established by the Department of Health and Human Services/Office of Inspector General Office. CMHOC is committed to the need to prevent and detect fraud, waste, and abuse and to adhere to federal and state laws, rules, and regulations. The CMHOC Corporate Compliance plan shall include training, monitoring, reporting, and correction procedures.

**II. APPLICABILITY AND RESPONSIBILITY:**

This policy applies to all staff directly employed by CMHOC, and contractual organizations as specified in their contracts.

**III. DEFINITIONS:**

**Compliance Program:** The compliance principles, components, and activities that guide CMHOC and its provider network  
**Corporate Compliance:** The mechanisms that are intended to prevent and detect unethical and/or illegal business practices and violations of the law.

**IV. POLICY:**

Community Mental Health of Ottawa County (CMHOC) will deliver services in strict conformance to the highest standards of accountability for administration, programs, services, business, marketing, human services, and financial management as it pertains to compliance and regulatory management. CMHOC is committed to the prevention and detection of fraud, abuse, fiscal mismanagement, and misappropriation of funds.

**V. PROCEDURE:**

The Executive Director (or his/her designee) will create and implement a corporate compliance plan annually. The plan will be designed to prevent and detect fraud, abuse, fiscal mismanagement, and misappropriation of funds. The plan shall include training, monitoring, reporting, and correction procedures. Implementation of the plan shall be monitored by the Director's designated Corporate Compliance Committee.

CMHOC will follow seven elements of compliance as outlined in the US Sentencing Guidelines in setting forth the expectations and procedures for carrying out compliance functions. The seven fundamental elements are:

1. Implementing written policies, procedures, and standards of conduct to be followed by employees and other agents.
2. Designating a compliance officer and compliance committee to provide program oversight.
3. Using due diligence in the delegation of authority.
4. Educating compliance standards and procedures to all employees and agents upon hire and annually thereafter.
5. Conducting monitoring and auditing to achieve compliance with standards and publicizing a system for employees to use to report violations of code standards, as well as criminal conduct, without fear of retribution.
6. Enforcing standards through well-publicized disciplinary guidelines.
7. Responding to detected offenses and development of corrective action initiatives to prevent further similar offenses.

**VI. ATTACHMENT:**  
Corporate Compliance Plan

**VII. REFERENCE:**  
US Sentencing Guidelines  
Department of Health and Human Services/Office of Inspector General  
Lakeshore Regional Entity, Section 9, Compliance Policies