



Compliance Program

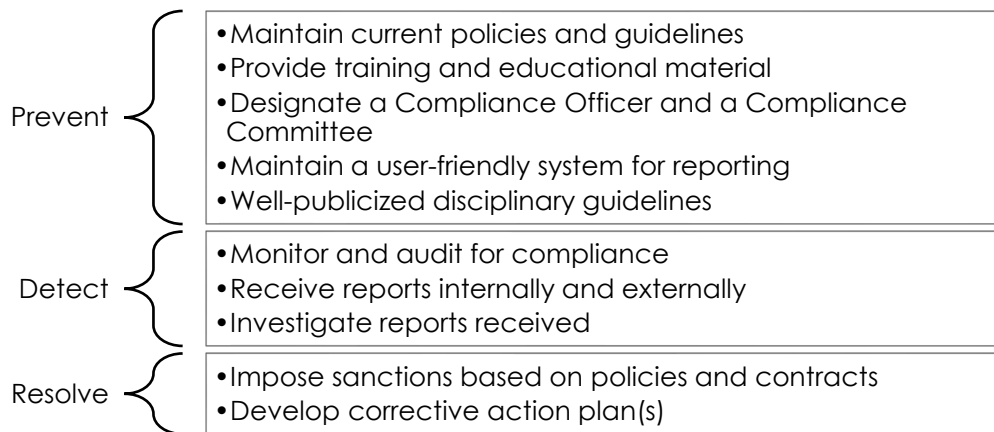
Effective January 1, 2022



Compliance Program

Great Rivers Behavioral Health Administrative Services Organization (Great Rivers BH-ASO) has a Compliance Plan that reinforces Great Rivers BH-ASO's strong commitment to ensuring compliance with all applicable laws, rules, regulations, and policies by which Great Rivers BH-ASO conducts business. The Compliance Program described in this document establishes a framework for developing the Annual Risk Assessment and Work Plan Process to adhere to all relevant legal requirements and prevent, detect (report), and resolve any breach of those legal requirements.

Great Rivers BH-ASO uses the seven essential elements of an effective compliance program from the US Department of Health and Human Services (HHS) as guidance for the program. The diagram below shows how the seven elements are implemented in Great Rivers BH-ASO's efforts to prevent, detect, and resolve compliance issues.



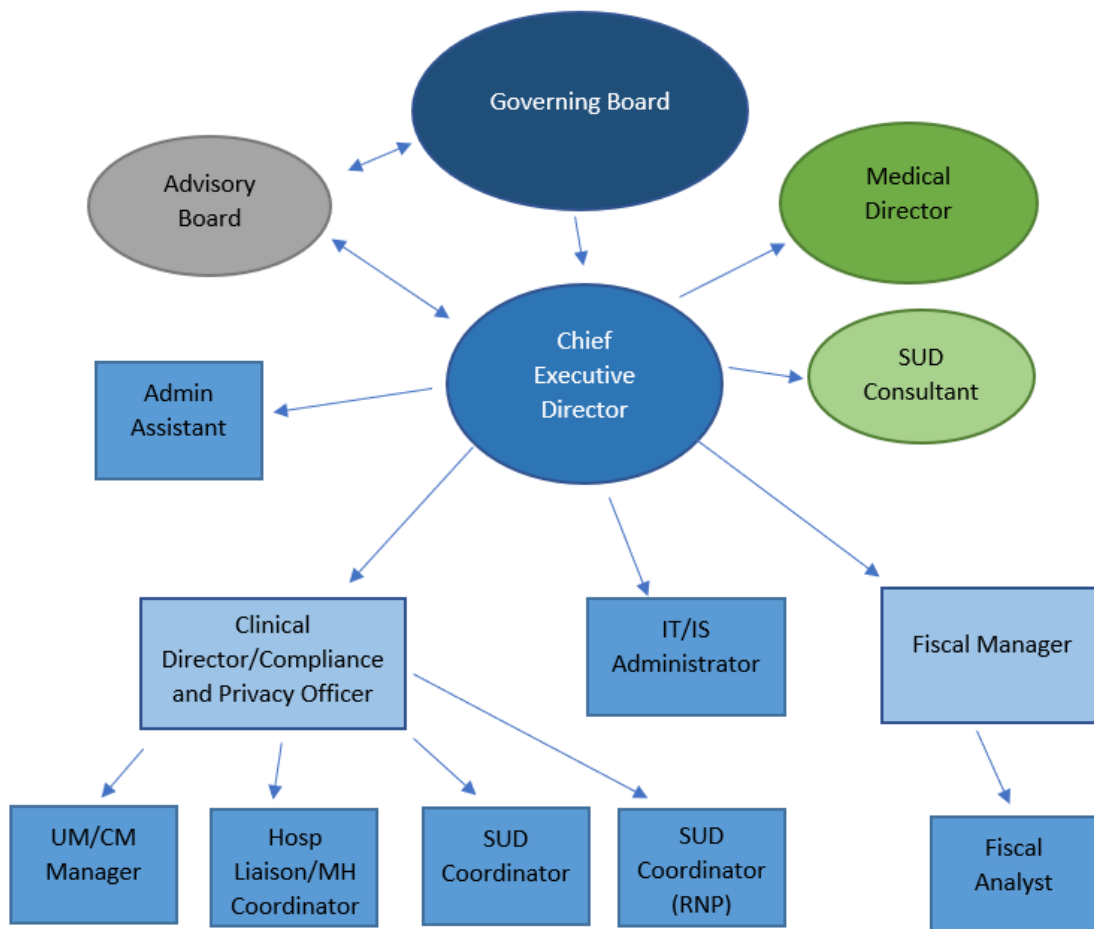


Organizational Structure

As described in the Compliance Plan, the Compliance Officer (CO) is the lead of the Compliance Program, including all of program integrity. The Ethics and Compliance Committee (ECC) works closely with the CO to implement the compliance plan and to monitor the compliance program. The CO is supervised by the Chief Executive Director (CED) and is responsible for alerting the CED and/or Governing Board of compliance issues that require special attention. Each department is responsible for being compliant in their areas of expertise and for reporting compliance concerns to the CO, the CED, and/or the Governing Board.

Great Rivers BH-ASO's Compliance Program exists to assist staff in finding answers to compliance related questions.

Great Rivers BH-ASO Organization Chart:





Compliance Program Annual Risk Assessment (RA) and Work Plan (WP) Process

The risk assessment (RA) is completed to identify risk and to evaluate risk level in the organization. The work plan (WP) outlines how Great Rivers BH-ASO will mitigate risk and delegates tasks to the applicable agency departments.

The CO drafts the RA using an appropriate RA tool and submits it to the ECC to review and discuss other potential areas of risk. The ECC develops a final version of the RA and drafts the WP. The CO presents the RA and WP to the CED who delegates WP tasks to the applicable agency departments. The CED and/or CO finalizes the RA and the WP with the Governing Board. The ECC continues to monitor risks that may need attention for their inclusion in the WP.

	Draft RA	Develop RA/WP	Review RA and Delegate tasks to Departments	Complete RA
Compliance Officer (CO)	Gather latest risk based on (but not limited to) OIG WP, changes in regulations, high level compliance risk in industry			Finalize RA and WP with Governing Board
ECC		Review and discuss potential other areas of risk and recommend WP items		Continue to monitor risks that may need attention
Chief Executive Director (CED) & Legal representative			Review RA and WP with CO and assign department responsible for each item	



Implementation of the WP

Once the WP is approved by the Governing Board, it is implemented by the appropriate agency departments. The CED monitors the work of the agency departments and reports risk and progress to the CO. The CO gathers all WP information and data and presents it to the ECC (at least quarterly). The ECC reviews the reports on risk and progress from the agency departments and makes recommendations for follow-up activities/tasks. The CED takes the ECC's reports back to the agency departments for implementation. The CO reports on the status of the work plan to the Governing and Advisory boards at least quarterly.

	WP Implementation	Departmental Monitoring	WP Progress	Report WP
Agency Departments	Implement the tasks in the WP and provide feedback and progress to the CED			
Compliance Officer (CO)		Add/update department plans and monitor each department on task progress	Gather information for report to ECC	Report on work plan status to Governing and Advisory Board regularly
ECC			Review/monitor WP progress and provide feedback for departments to follow-up	
Chief Executive Director (CED), or delegate		Monitor tasks and task completion by agency department and create plans with department to continue addressing the risk item	Provide ECC reports to departments	



Compliance Program Reporting & Investigations Process

Great Rivers BH-ASO's reporting process promotes resolving things at the lowest level possible to encourage people to report concerns of non-compliance.

Reports are received by the CO, unless the report is against the CO. Reports against the CO should go to the CED and/or Governing Board. The CO reviews the report and then shares it with the CED. The CED shares the report with the applicable agency department(s) and assigns investigation and follow-up activities. The CO completes program integrity and/or privacy investigations and coordinates with departments, as necessary. Agency departments complete reports and follow-up with the CED. CO reviews all reports and determines if legal needs to be involved. All reports are presented to the ECC. The ECC reviews the reports and requests additional investigation/documentation, as needed to close the report. Upon report completion, the CO reports to the required entities, including the Governing Board. Fraud, abuse, waste, and breaches shall include legal and ECC when investigations indicate potential need for additional reporting.

	Reports	Investigation	Report Review	Report Out
Compliance Officer (CO)	The CO receives a compliance concern, reviews the report, and shares it with the CED	The CO completes Program Integrity (F&A) or Privacy Investigations by coordinating with appropriate departments	Review agency department reports for completion. Determine if Legal needs to be involved	Assist in required reporting (Incident Report is completed by QM)
Agency Department		Agency departments complete necessary investigation(s) and follow-up with CED/CO on report completion		
ECC			Review Investigation Identify areas that may need additional attention	
Chief Executive Director (CED), or delegate	The CED sends the report to the responsible department(s) to complete the investigation and follow-up	Review reports from agency departments and provide to CO	Coordinate with CO on steps to take to address the concern(s) Act as needed	



Compliance Program Policy & Training Process

Compliance and Privacy policies and trainings will be reviewed and updated at least one time a year. The CO will complete the review and submit it to the ECC for feedback. Per the ECC's feedback, the CO will update the policies and trainings and submit the policies to the Governing Board for approval and execution.

	Review Policy	Policy Feedback	Finalize
Compliance Officer (CO)	Compliance & Privacy policies and trainings reviewed & update		Submit Policy to CED/CO to run it through the Policy review process. CO submits to the Governing Board to be approved/executed.
ECC	↓ →	Provide feedback on Policy & Training	← ↑

Exceptions

For any exceptions to the processes outlined above, Great Rivers BH-ASO's CED or Legal Consultant is available to work through the exception(s) and assist in identifying next steps to ensure resolution is achieved.

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Vickie L. Raines 1/11/2022
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Vickie L. Raines
 Governing Board Chair