

# Great Rivers Behavioral Health Administrative Services Organization

Policy Title: **Reporting Compliance Concern**

Policy No. **5028.00**

Category: HIPAA Privacy & Security

Date Adopted: 02/14/2020

Date Revised:

Reference: Washington State Health Care Authority (HCA) Contract with Great Rivers Behavioral Health Administrative Services Organization

## **POLICY**

- 1.1. Great Rivers Behavioral Health Administrative Services Organization (Great Rivers BH-ASO), in an effort to be compliant with the Privacy Rules of HIPAA's Administrative Simplification provisions, sets out, in this policy, the process for reporting a suspected Privacy compliance violation.
- 1.2. Great Rivers BH-ASO encourages the reporting of suspected compliance violations and of making inquiries related to other ethical and compliance issues. Calls and reports may be made anonymously, but anonymous calls may be difficult to investigate.
- 1.3. Great Rivers BH-ASO will make every effort to maintain, within the limits of the law and the practical necessities of conducting an investigation, the confidentiality of the reporting/inquiring person's identity.
- 1.4. There will be no retaliation against anyone who in good faith reports a suspected or actual violation. However, any workforce member who deliberately makes a false accusation will be subject to discipline. Moreover, reporting a violation does not protect individuals from appropriate disciplinary action regarding their own misconduct.

## **PROCEDURE:**

- 2.1. Great Rivers BH-ASO staff, contracted providers, or any other agency with which Great Rivers BH-ASO does business, will report any incident or issue of potential fraud or abuse immediately.
- 2.2. Anyone may report potential compliance concerns about Great Rivers BH-ASO workforce members, contractors, or vendors.
  - 2.2.1. A "Fraud and Abuse" flyer shall be posted in a conspicuous area of each Great Rivers BH-ASO contracted provider location and at Great Rivers BH-ASO office locations.
- 2.3. Reports may be brought by varied stakeholders, including but not limited to staff, contractors, vendors, and clients.
  - 2.3.1. Any reports related to Great Rivers BH-ASO's compliance to laws, rules, regulations or Great Rivers BH-ASO's policies and procedures should be reported to the Great Rivers BH-ASO Compliance Officer if they are unable to be resolved at the lowest level at Great Rivers BH-ASO.
    - 2.3.1.1. Urgent matters shall be reported up to management until the situation can be handed off to a Great Rivers BH-ASO manager with the knowledge that the situation is being taken care of or has been reported to the Great Rivers BH-ASO Compliance Officer.

- 2.3.2. Great Rivers BH-ASO Contracted Providers shall follow Great Rivers BH-ASO Incident Report policy for any potential violations related to consumers or themselves.
- 2.3.3. If the potential violation is related to another Great Rivers BH-ASO network provider or vendor, it should be reported to the Great Rivers BH-ASO Compliance Officer.
- 2.3.4. Grievances from individuals receiving services or their families shall follow Great Rivers BH-ASO Grievance policy.
- 2.4. Reports to the Great Rivers BH-ASO Compliance Officer may be made using one of the following options:
  - 2.4.1. In person, to the Compliance Officer
  - 2.4.2. Anonymously and confidentially by calling the Compliance Officer at 800-272-8917
  - 2.4.3. Emailing a concern or report to [comply\\_WFA@grbhaso.org](mailto:comply_WFA@grbhaso.org)
  - 2.4.4. On line at: [www.grbhaso.org](http://www.grbhaso.org)
  - 2.4.5. Mailing a written concern or report to:  
Compliance Officer  
Great Rivers BH-ASO  
P.O. Box 1447  
Chehalis, WA 98532
- 2.5. Any grievances or incident reports received by Great Rivers BH-ASO that result in corrective action and/or violation of laws, rules, regulation, or Great Rivers BH-ASO policy and procedure shall be reported to the Great Rivers BH-ASO Compliance Officer for tracking and monitoring.
- 2.6. Great Rivers BH-ASO's Compliance Officer shall maintain documentation of the entire process and how it was addressed.
- 2.7. An investigation may be conducted in an effort to verify the report, the scope of the report, the approximate dollar amount involved, any action already taken regarding the report, and the legal and administrative disposition within the case.
- 2.8. Great Rivers BH-ASO Compliance Officer may review the report with Great Rivers BH-ASO's chief executive director (CED), legal counsel, and Great Rivers BH-ASO board members. All Great Rivers BH-ASO staff investigations shall be submitted to human resources and, as appropriate, supervisor or division chief.

POLICY SIGNATURE

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Edna J. Fund, Chair  
 Great Rivers BH-ASO Governing Board

4/14/2020

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Date