



# Compliance Plans

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# CBH Compliance Forum: Compliance Plans



## Topics to be Discussed

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- An illustration of five white, 3D-rendered human figures sitting in a circle on chairs. They are facing each other, suggesting a group discussion or meeting. The figures are simple, with large heads and no facial features. The background is a light gray gradient.
- 2023 Compliance Plan Project Quarterly Results
  - What is a Compliance Plan
  - Why is a Compliance Plan Important

# 2023 Compliance Plan Project



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- A man in a dark suit stands with his back to the camera, looking at a large chalkboard. The chalkboard is covered in various mathematical formulas, diagrams, and symbols, including integrals, summations, and geometric shapes. The man's hands are clasped behind his back.
- **Q1 LOC Reviewed and Findings**
    - 100 – Inpatient Psych
    - 140 – Inpatient Psych (extended)
    - 150 – Inpatient D&A
    - 200 – Non-Hospital D&A
  - **Q2 LOC Reviewed and Findings**
    - 300 – Outpatient Psych
    - 325 – Partial Psych
    - 350 – Outpatient D&A
    - 600 - Ancillary Lab Services
  - **Q3 Programs to be Reviewed**
    - 425- IBHS, 450 –Host Homes, 600 – Ancillary Lab Services, 700 – Ancillary: Other Psychiatric
  - **Q4 Programs to be Reviewed**
    - 500 - RTF, 550 – RTF Non-Accredited , 750 - Reinvestment, 800 – Community Support Psychiatric

# Why Do We Need A Compliance Plan?



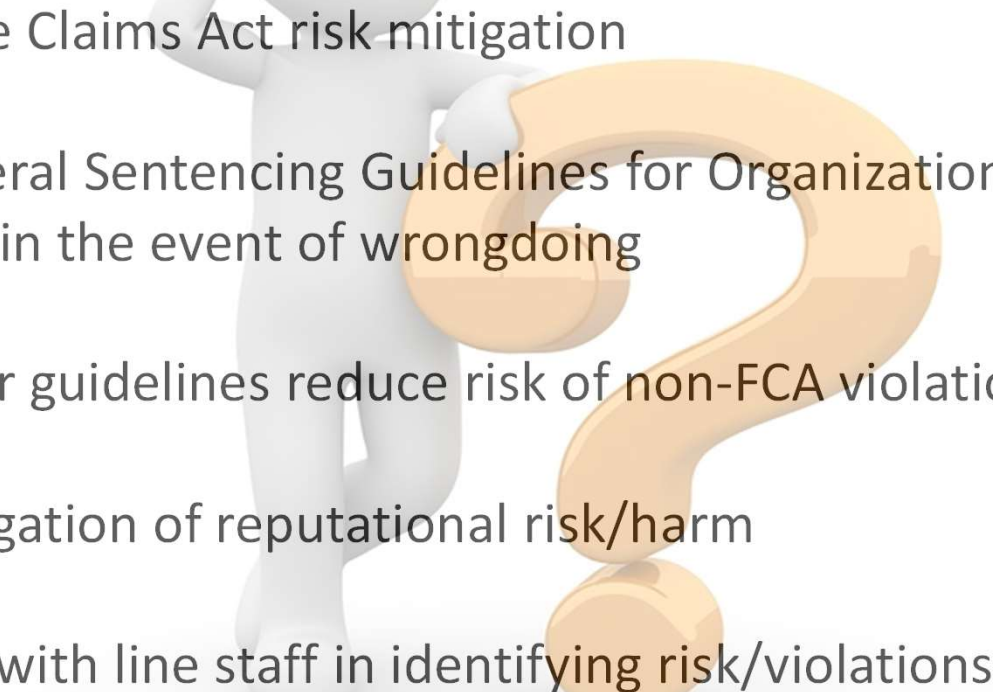
## • CBH Requirement

- Maintain a corporate compliance program in accordance with standards set forth in the CBH Provider Manual to prevent and protect against fraudulent billing, embezzlement of funds, waste, and abuse.
- CBH Provider Manual (5.3.2) states, “Providers are reminded that the CBH Provider Agreement requires them to have a written Compliance Plan. The seven elements of an effective compliance plan include...”

# Why Is A Compliance Plan Important



## Compliance Plans (Best Practice / Benefit)

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- A 3D white figure stands next to a large, orange, glossy question mark. The figure has its right hand on its head in a thinking pose and its left hand resting on the top of the question mark. The figure is standing on a light gray circular shadow.
- False Claims Act risk mitigation
  - Federal Sentencing Guidelines for Organizations relief in the event of wrongdoing
  - Clear guidelines reduce risk of non-FCA violations
  - Mitigation of reputational risk/harm
  - Ally with line staff in identifying risk/violations early

# What Is A Compliance Plan?



- Plan is the written summary/organization of a compliance program
- Things to note
  - Healthcare entities have enhanced risk without effective compliance programs
  - Presence of the plan is not sufficient, implementation and adherence is key
  - No one size fits all/most template
- The 7 elements of an Effective Compliance Program



# What Is A Compliance Plan?



## The 7 Elements: A closer look

1. Implementing Written Policies and Procedures
2. Designating a Compliance Officer and/or Committee
3. Effective Training & Education
4. Open Lines of Communication
5. Enforcement and Disciplinary Guidelines
6. Risk Assessment, Internal Auditing & Monitoring
7. Prompt Response to Offenses and corrective actions

# Additional Resources



- US Department of Health and Human Services Office of Inspector General (OIG) General: **Compliance Program Guidance**
  - <https://oig.hhs.gov/compliance/general-compliance-program-guidance/>
- CBH Provider Manual
  - [https://cbhphilly.org/wp-content/uploads/2023/05/CBH\\_Provider-Manual\\_2023-05-12.pdf](https://cbhphilly.org/wp-content/uploads/2023/05/CBH_Provider-Manual_2023-05-12.pdf)





# Questions or Comments

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