

**SBHO COMPLIANCE COMMITTEE
CHARTER AGREEMENT
FY 2017-2018**

**Established: November 2012 as PRSN Charter Agreement
Updated: June 2017 as SBHO Charter Agreement**

The Salish Behavioral Health Organization (SBHO) Compliance Committee (“Committee”) is an advisory group for compliance-related issues within the region. The Committee is a collective membership between the SBHO and the network providers that provides an open forum to discuss and resolve program issues which support a strong Compliance Program throughout the network.

The term “compliance” used in this charter refers to adhering to federal, state, and local laws and regulations; SBHO policies; coding and billing rules that relate to public behavioral health services.

I. Purpose

The Committee functions in an advisory capacity to the SBHO Compliance Officer and assists with the SBHO Compliance Program.

The primary goals of the Committee are to:

1. Assist the SBHO in fulfilling its governance responsibilities relating to compliance with applicable laws, regulatory requirements, industry guidelines, and policies.
2. Provide a vehicle for communication between Federal and State entities, DBHR, SBHO and the network designated Compliance Officers.

II. Organization

The SBHO Compliance Officer will facilitate the Committee meetings, prepare the Committee material, and provide Committee meeting notes to document activities and recommendations from each meeting.

The Committee meeting will be held at least quarterly. However, the Committee may be convened more frequently for urgent matters.

III. Membership

Committee membership includes designated Compliance Officers from within the region. Each agency shall have one designated Committee member responsible to attend and actively participate in the quarterly meeting. Network agencies may have multiple staff conducting Compliance activities that are invited to attend the meetings.

Members of the SBHO Compliance Committee include:

1. SBHO designated Compliance Officer
2. KMHS designated Compliance Officer
3. JMHS designated Compliance Officer
4. PBH designated Compliance Officer
5. WEOS designated Compliance Officer (Forks Hospital also has a Compliance Officer)
6. CommCare’s designated Compliance Officer

7. True Star designated Compliance Officer
8. Cedar Grove designated Compliance Officer
9. Olympic Personal Growth designated Compliance Officer
10. Reflections designated Compliance Officer
11. Specialty Services designated Compliance Officer
12. Beacon of Hope designated Compliance Officer
13. Agape Unlimited designated Compliance Officer
14. Cascadia-Bountiful Life designated Compliance Officer
15. Kitsap Recovery Services designated Compliance Officer
16. West Sound Treatment Center designated Compliance Officer

Members are asked to designate another agency staff to attend a meeting in their absence.

In addition to the above membership, SBHO legal counsel may attend and participate in the Committee meetings as necessary and appropriate for the rendering of legal advice to the Committee.

IV. Duties and Responsibilities

The Committee's primary duties and responsibilities are as follows:

A. Compliance

1. Review the SBHO Compliance Program, which is intended to foster compliance with all federal and state laws and regulations applicable to behavioral health providers (reference Committee Workplan, attachment 1).
2. Share the network CMHA and licensed SUD treatment Compliance Programs and efforts to educate its employees to promote adherence to laws and regulations.
3. In an attempt to strengthen the network Compliance Program, review and discuss possible resolutions to findings with respect to:
 - (i) reports for the operation of the Compliance Program
 - (ii) material reports, notices, and inquiries received from audits and/or auditors
 - (iii) trends and gaps discovered as a result of an internal investigation
4. Distribute local, state, and federal regulation revisions and discuss implementation of new rules.

B. Ethics

1. Receive periodic reports from the Committee members concerning training and education programs and requirements for employees relating to applicable Codes and Standards of Conduct.

C. General

1. Perform other activities deemed necessary, advisable or appropriate for the Committee to perform.
2. SBHO Compliance Officer will report once a year to the QUIC concerning Committee activities.

Recuse

Committee members will recuse themselves from participating in discussions of “an issue of concern”, allegation, or investigation that involves their agency of employment.

Attachment 1

2017-2018 Compliance Committee Work Plan

Activity	Timeline	Participants	Comments
SBHO Admin. Review	Within contract period	KMHS JMHS PBH WEOS CommCare True Star Cedar Grove Olympic Personal Growth Reflections Specialty Services Beacon of Hope Agape Unlimited Cascadia-Bountiful Life Kitsap Recovery Services West Sound Treatment Ctr	2015 completed as PRSN; June 2016-June 2017 SBHO reviews completed; 2017-18 completed; 2018-19 reviews are in the scheduling process
Annual EQRO Review	Annual	SBHO	May 2014, July 2015; November 2016; Fall 2017; June 2018
SBHO Compliance Committee Meetings	Quarterly	Committee Members	<ul style="list-style-type: none"> • 6/1/2017 • 9/7/2017 • 12/7/2017 • 3/1/2018 • 6/7/2018
Annual review and Update Committee Charter	Annual	Committee Members	Completed: 4/2015 Scheduled 6/2018
Annual review SBHO Compliance Plan	Annual	Committee Members	Completion: 4/2015; 9/2017
Review SBHO F&A Activity Log, FY 2015	Annual	Committee Members	Completed: 9/2014
SBHO Encounter Data Validation Reviews- trends	Annual	Committee Members	Completion: 2015, 2016; 2017 in progress
Annual review and updated SBHO Risk Assessment	Annual	SBHO staff & Committee Members	Completed: 12/2014; 11/2016; 9/2017
Review CMHA Risk Assessment process	Annual	Committee Members	Completion: 2015

			Incorporated in with Administrative Reviews.
Discuss agency-specific "issues of concern"	On-going	Committee Members	At each quarterly Compliance meetings, on-going
Discuss Provider internal Compliance activities	On-going	Committee Members	At each quarterly Compliance meetings, on-going
Discuss emerging Compliance topics	On-going	Committee Members	At each quarterly Compliance meetings, on-going
Discuss Compliance notifications and local articles	On-going	Committee Members	At each quarterly Compliance meetings, on-going