

**PARTNERSHIP HEALTHPLAN OF CALIFORNIA
POLICY / PROCEDURE**

Policy/Procedure Number: CMP-01		Lead Department: Administration	
Policy/Procedure Title: Compliance Program		<input type="checkbox"/> External Policy <input checked="" type="checkbox"/> Internal Policy	
Original Date: 04/27/2006		Next Review Date: 08/18/2023 Last Review Date: 08/18/2022	
Applies to:	<input checked="" type="checkbox"/> Medi-Cal	<input type="checkbox"/> Healthy Kids	<input checked="" type="checkbox"/> Employees
Reviewing Entities:	<input type="checkbox"/> IQI	<input type="checkbox"/> P & T	<input type="checkbox"/> QUAC
	<input type="checkbox"/> OPERATIONS	<input type="checkbox"/> EXECUTIVE	<input type="checkbox"/> COMPLIANCE <input type="checkbox"/> DEPARTMENT
Approving Entities:	<input type="checkbox"/> BOARD	<input checked="" type="checkbox"/> COMPLIANCE	<input type="checkbox"/> FINANCE <input type="checkbox"/> PAC
	<input checked="" type="checkbox"/> CEO <input type="checkbox"/> COO	<input type="checkbox"/> CREDENTIALING	<input type="checkbox"/> DEPT. DIRECTOR/OFFICER
Approval Signature: Elizabeth Gibboney, CEO		Approval Date: 08/18/2022	

I. RELATED POLICIES:

N/A.

II. IMPACTED DEPTS.:

All.

III. DEFINITIONS:

N/A.

IV. ATTACHMENTS:

N/A.

V. PURPOSE:

To establish Partnership HealthPlan of California's (PHC) compliance standards and enforcement of employees, temporary personnel, volunteers, interns, health care providers, subcontractors, delegates, and/or a member of the PHC Board of Commissioners compliance with ethical standards, compliance policies and guiding principles, contractual obligations, accreditation standards, and all applicable statutes, regulations, and rules pertaining to PHC's Medi-Cal line of business.

VI. POLICY / PROCEDURE:

A. Policy.

1. Compliance Program Governance:

- a. PHC shall establish a compliance program, including the development and maintenance of the compliance program structure and written compliance information and documentation to govern the program, which includes at minimum;
 - i. Compliance policies and procedures;
 - ii. Compliance plan;
 - iii. Designation of a Compliance Officer;
 - iv. Compliance committee and as appropriate, subcommittees;
 - v. Code of Conduct; and
 - vi. Compliance training.
- b. PHC shall review and as needed, revise the written compliance program materials at least once annually and more frequently as changes occur in PHC's needs and/or obligations, based on all applicable statutes, regulations, and rules pertaining to PHC Medi-Cal line of business.
- c. PHC's Compliance Committee and Board of Commissioners shall review and approve the Compliance Plan annually in accordance with the terms and conditions of this policy.

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- d. To ensure awareness of and compliance with PHC’s compliance program, the Compliance Committee, chaired by the Compliance Officer, shall support:
 - i. PHC’s maintenance of a compliance program and implementation of compliance initiatives;
 - ii. Implementation and maintenance of related compliance program materials,;
 - iii. Ongoing and open communication regarding compliance matters among management, those responsible for the internal compliance function, PHC workforce and the Commission; and
 - iv. Perform any other duties as directed by the Commission.
- 2. Participation in the Compliance Program
 - a. Regulatory Affairs & Compliance, with oversight and direction the Compliance Officer or their designee, shall annually review and amend the Compliance Plan, compliance training, compliance policies, and the Code of Conduct, as appropriate, to maintain compliance with contractual obligations, all applicable accreditation requirements, statutes, regulations, and rules pertaining to PHC Medi-Cal line of business.

B. Procedure.

- 1. Regulatory Affairs and Compliance (RAC) Program Responsibilities
 - a. Regulatory Affairs & Compliance, with oversight and direction the Compliance Officer or their designee, shall annually review and amend the Compliance Plan, compliance training, compliance policies, and the Code of Conduct, as appropriate, to maintain compliance with contractual obligations, all applicable accreditation requirements, statutes, regulations, and rules pertaining to PHC Medi-Cal line of business.
- 2. Compliance with the Program
 - a. In demonstration of commitment to understanding of and adherence with PHC’s compliance program and in addition to completing mandatory compliance training, PHC’s Board of Commissioners, employees, temporary personnel, and interns shall annually review and acknowledge understanding of PHCs Compliance Plan and Code of Conduct.
 - b. RAC, in collaboration with Human Resources and/or the Clerk of the Board shall assign and maintain record of PHC workforce and Commission members Compliance Plan and Code of Conduct attestations at the time of hire or appointment, annually thereafter, and ad hoc as deemed necessary.

VII. REFERENCES:

- A. 2020 Compliance Plan

VIII. DISTRIBUTION:

- A. SharePoint
- B. Directors

IX. POSITION RESPONSIBLE FOR IMPLEMENTING PROCEDURE:

Compliance Officer

X. REVISION DATES:

Medi-Cal

03/02/2010, 12/06/2011, 12/04/12, 12/01/2015, 12/06/2016, 11/15/2017, 11/21/2019, 08/20/2020, 08/19/2021, 08/18/2022

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PREVIOUSLY APPLIED TO:

Partnership Advantage:

CMP-01 – 06/2006 to 01/01/2015

Healthy Families:

CMP-01 – 10/1/2010 to 03/01/2013

Healthy Kids

CMP-01 – 04/27/2006 to 12/01/2016