

**WEST MICHIGAN COMMUNITY MENTAL HEALTH
ADMINISTRATIVE MANUAL**

		Chapter: 6	Section: 1	Subject: 1
CHAPTER: Regulatory Management				
SECTION: Regulatory Management				
SUBJECT: Corporate Responsibility				
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- I. **PURPOSE:** To establish a corporate compliance program.
- II. **APPLICATION:** All programs and services operated by West Michigan CMH.
- III. **REQUIRED BY:** Contract with Lakeshore Regional Entity/PIHP; 42 CFR Ch. IV §438.608
- IV. **DEFINITIONS:** Not applicable.
- V. **POLICY:** That regulatory management is an obligation incumbent upon West Michigan CMH, its network providers, and their respective governing bodies, employees, volunteers, network providers and vendors.

The Governing Body recognizes the following as responsibilities of West Michigan CMH:

- 1. Compliance with all laws and regulations applicable to Authority operations;
- 2. Adherence to the spirit of compliance guidance issued by the Office of the Inspector General of the United States Department of Health and Human Services;
- 3. Adherence to the letter and spirit of the Hi-Tech Health Insurance Portability and Accountability Act (HIPAA) Omnibus Rule and regulations promulgated there under; and,
- 4. Meeting accreditation standards on regulatory management.

West Michigan CMH is formally committed to the integration of regulatory management into its culture and operations.

To foster regulatory management, West Michigan CMH shall develop and implement a regulatory management program designed to promote regulatory responsibility and to minimize the risk of noncompliance.

Compliance with HIPAA shall be an integrated component of West Michigan CMH's regulatory management program.

VI. PROCEDURES:

Standards and Guidelines:

- a. The Regulations/Compliance Officer shall serve as the primary point of contact for monitoring and reporting on matters relating to regulatory management and

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shall have direct access to the CEO. The Regulations Officer shall also have direct access to the Chair of the Board of Directors on matters involving regulatory management. The Regulations Officer will also serve as the Privacy Officer. The Information Services Manager will serve as the Security Officer.

- b. The Compliance Oversight Committee will be facilitated by the Regulations Officer. The Committee will be comprised of individuals with varying responsibilities within the organization, including but not limited to operations, finance, human resources, utilization review, claims processing, and information systems. These individuals should have the requisite seniority and comprehensive experience within their respective functional areas to implement any necessary changes in WMCMH policies and procedures. Compliance Oversight Committee members should demonstrate high integrity, good judgment, assertiveness and an approachable demeanor, while eliciting the respect and trust of the employees of the organization. The Committee will advise the Regulations Officer, CEO and the WMCMH Board in overseeing the implementation and operation of the WMCMH Compliance Program.
- c. West Michigan CMH will participate in the Lakeshore Regional Entity Corporate Compliance activities as requested.

VII. SUPPORTING DOCUMENTS: Not applicable.

6-1-1 Corporate Responsibility

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