	Corporate Responsibility		
	Chapter:	Corporate Compliance	Policy #
	Section:	Regulatory Management	Revision #
			6-1-1
			4

- 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:** Corporate compliance is an obligation incumbent upon West Michigan CMH, its network providers, and their respective governing bodies, employees, volunteers, 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 corporate compliance.

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


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

Compliance with HIPAA and other mandatory healthcare privacy rules shall be an integrated component of West Michigan CMH's corporate compliance program.

VI. **PROCEDURES:**

Standards and Guidelines:

- a. The Director of Corporate Compliance shall serve as the primary point of contact for monitoring and reporting on matters relating to corporate compliance and shall have direct access to the CEO. The Director of Corporate Compliance shall also have direct access to the Chair of the Board of Directors on matters involving corporate compliance. The Director of Corporate Compliance will also serve as the Privacy Officer and Compliance Officer. The Director of Information Technology will serve as the Security Officer.
- b. The Corporate Compliance Committee will be facilitated by the Director of Corporate Compliance. The Committee will be comprised of individuals with

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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. Corporate Compliance Committee members should demonstrate high levels of 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 Director of Corporate Compliance, CEO and the WMCMH Board in overseeing the implementation and operation of the WMCMH Corporate Compliance Program.

- c. West Michigan CMH will participate in the Lakeshore Regional Entity Corporate Compliance activities as requested.

VII. **SUPPORTING DOCUMENTS:** Not Applicable

VIII. **POLICY/PROCEDURE REVIEW:**

REV#	APPROVED BY	Policy/Procedure	DATE
1	CCC	Procedure	3/15
NC	TB		5/16
NC	TB		5/17
NC	CCC		5/18
2	Unknown	Procedure	6/19
3	Kevin Wilske	Procedure	12/20
3	CCC	Annual Review	02/22
3	CCC	Annual Review	01/24
4	CCC	Language Changes	1/25
Board Approval Date: 3/19/2002			

IX. **CHIEF EXECUTIVE OFFICER ENDORSEMENT:**

I have reviewed and approve of policy # 6-1-1 Revision # 4.

CEO: Lisa Williams

Approval Signature: _____