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ADMINISTRATIVE OPERATIONS
(Manual Section)

COMPLIANCE – POLICY 2700

Approval of Policy	Dated:
Original Policy Inception:	February 14, 2002
Policy Last Reviewed:	October 1, 2025
Last Revision of Policy Approved:	October 7, 2024

• 1 POLICY:

The Agency shall establish and maintain an internal system of procedures and activities designed to assure compliance by employees, contracted and sub-contracted agents with federal and state regulations and PIHP contract concerning delivery of and reimbursement for federal- and state-funded mental health care services and supports. Compliance in this area is challenging because the regulatory requirements are complex and changing. The Agency recognizes that its business relationships with other providers, vendors, and clients are subject to legal requirements and accountability standards, so it takes everyone working together to assure compliance.

NeMCMHA is dedicated to adhering to the highest ethical standards and recognizes the importance of full compliance with State and federal regulations. This policy is intended to address matters relating to the Federal False Claims Act (1863), the Michigan False Claims Act (1977), the Anti-Kickback Statute (1987), the Health Insurance Portability and Accountability Act (HIPAA, 1996), the Balanced Budget Act (now known as the Managed Care Rules, 2002), the Deficit Reduction Act (Medicaid Integrity Program, 2006), as well as any other circumstances in which the potential for or actual occurrence of Medicaid fraud, waste and/or abuse is involved.

The Board delegates to the Executive Director the responsibility to designate an appropriate management employee as Compliance Leader. Neither the Executive Director nor the Finance Officer shall be named Compliance Leader.

The Agency's Compliance Plan will mirror and follow the PIHP's Compliance Plan. With regards to reporting requirements, Agency employees may report to the Agency Compliance Leader by calling 989-358-7741 (Agency Compliance Hotline) or toll free 800-968-1964, ext. 7741, or e-mail to jwalburn@nemcmh.org. Individuals may also contact the PIHP's Chief Compliance and Quality Officer at 231-383-6551 or 1-866-789-5774 (hotline) for any compliance questions or concerns.

• 2 APPLICATION:

All Employees and Contractors/Sub-contractors

• 3 DEFINITIONS:

• 4 CROSS-/REFERENCES:

Policy 3090 – Code of Ethics
Policy 3040 – Whistleblowers Act
Policy 3610 – Prohibited & Unacceptable Conduct
Policy 2900 – Disclosure of Ownership
Policy 3050 – Discrimination-Harassment Prohibition
Policy 5200 – Consumer Records
NMRE Policy & Procedure – PIHP Medicaid Services Verification Audit

• 5 FORMS AND EXHIBITS:

Exhibit A – NeMCMHA Regulatory Compliance Plan Acknowledgement Form
Exhibit B – NeMCMHA Compliance Plan
Exhibit C – Compliance Report Form
Exhibit D – Compliance Investigation Report Form
NeMCMHA Compliance Plan

• 6 PROCEDURE

None