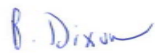




United Behavioral Health

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| Compliance: Communication and Reporting | | Policy Identifier/Number: AD-01D | |
| Annual Review Completed Date: February 2018 | | | |
| Policy Category: Government - Pierce Regional Support Network | Applicable Lines of Business: Medicaid | Entity/Plan: Optum Pierce Behavioral Health Organization | State: Pierce County, Washington |
| Approved by: Bea Dixon, Executive Director | | Signature:  | |

Policy Statement and Purpose

Optum Pierce Behavioral Health Organization (BHO) will maintain open lines of communication with employees, contracted community behavioral health agencies and other staff to support compliance awareness and to encourage and provide a means for individuals to report, anonymously if desired, suspected or actual instances of non-compliance or fraud, waste or abuse without fear of retaliation.

The purpose of this policy is to ensure that Optum Pierce BHO has effective processes that foster a compliance culture, provide ongoing support to compliance awareness and give confidence to individuals to raise and report compliance concerns.

Policy Audience and Applicability

This policy is applicable to the Optum Pierce BHO and benefits administered through the Washington State Department of Social and Health Services (DSHS) current Prepaid Inpatient Health Plan (PIHP) and Behavioral Health State Contract (BHSC).

Policy Definitions

Abuse refers to provider or entity actions that are inconsistent with sound fiscal, business, or medical practices and results in an unnecessary cost to the Medicaid program, or in reimbursement for services that are not medically necessary or that fail to meet professionally recognized standards for health care.

Compliance – adherence to federal, state, and local laws and regulations, licensing requirements, accreditation standards and UHG and Optum policies and procedures.

Optum is responsible for adhering to all applicable state and/or federal laws governing activities within the scope of this policy, including the Mental Health Parity and Addiction Equity Act (MHPAEA) and the Health Insurance Portability and Accountability Act (HIPAA) privacy requirements, as well as the applicable requirements, standards and regulations as set forth by the Employee Retirement Income Security Act (ERISA), the Center for Medicare and Medicaid Services (CMS), the Department of Labor (DoL), and any applicable accrediting organizations.

Compliance Officer – refers to the person appointed by the Optum Pierce BHO Executive Director to fulfill this role in compliance with Federal Program Integrity requirements and contractual requirements with the Washington State Department of Social and Health Services.

Fraud refers to an intentional deception or misrepresentation made by a person with the knowledge that the deception could result in some unauthorized benefit to them or some other person and includes any act that constitutes fraud under applicable federal or State law.

Waste refers to unintentional overutilization, underutilization, or misuse of resources.

Policy Provisions

1. Periodic messages and other communications will be distributed to Optum Pierce BHO staff as well as to compliance representatives at the contracted community behavioral health agencies on a planned and on an ad hoc basis to create awareness to current compliance topics, compliance reporting procedures and other compliance program policies and expectations.
2. Any Optum Pierce BHO staff member, contracted community behavioral health agency, individual in services, or other stakeholder may contact the Compliance Officer with any compliance, fraud, waste or abuse related question or concern.
3. Multiple mechanisms are in place within Optum Pierce BHO to report fraud, waste, abuse, or other compliance/program integrity related incidents. Reports can be made:
 - 3.1. To the Compliance Officer:
 - 3.1.1. In person at the Optum Pierce BHO office;
3315 S. 23rd Street, Suite 310, Tacoma, WA 98405
 - 3.1.2. During community meetings
 - 3.1.3. Telephonically at 253-292-4195
 - 3.1.4. Via email see address on Optum Pierce BHO [website](#).
 - 3.1.5. Via fax, to 253-292-4219
 - 3.2. In writing to:
Compliance Officer
Optum Pierce BHO
3315 S. 23rd Street, Suite 310
Tacoma, WA 98405
 - 3.3. Optum maintains a 24-hour toll-free telephone hotline called the “Compliance Helpline,” through which incidents of suspected non-compliance or other misconduct can be reported. This hotline feeds into a voicemail box so that callers can remain anonymously or can leave a call back number to discuss the reported issue further. The number for the Compliance Helpline is 1-800-455-4521.
4. Optum Pierce BHO shall communicate with the DSHS designee and with Corporate Optum Behavioral Health Compliance staff as appropriate to discuss possible resolutions of reported non-compliance.

Related Policies, Procedures & Materials

- Optum Pierce Behavioral Health Organization policy:
 - *AD-01A Compliance: General Compliance Policy*
 - *AD-01B Compliance: Governance and Oversight*
 - *AD-01C Compliance: Communication and Reporting*
 - *AD-01E Compliance: Routine Auditing and Monitoring*
 - *AD-01F Compliance: Enforcement of Disciplinary Guidelines*
 - *AD-01G Compliance: System for Prompt Response to Compliance Issues*

Attachments

N/A

Approval History

- Policy created and effective: February 2018