

**VAN BUREN COMMUNITY MENTAL HEALTH AUTHORITY  
POLICIES & PROCEDURES**

**Title:** Compliance Monitoring and Auditing  
**Originated:** 02/09/10  
**Revised:** 03/08/11, 10/09/18

**Number:** I.06.04  
**Approved By:** Executive Team

**PURPOSE:**

The purpose of this policy is to articulate Van Buren Community Mental Health's (VBCMh) commitment to comply with applicable legislative and regulatory standards as relevant to the accomplishment of its mission.

**POLICY:**

VBCMh's Corporate Compliance Officer (CCO) is responsible for monitoring compliance activities and operations. The CCO must then report any determinations to the Compliance Committee and VBCMh's CEO. The CCO will identify, interpret and determine standards of compliance through internal and external audits.

**PROCEDURES:**

**Monitoring:** VBCMh believes that a thorough and ongoing evaluation of the various aspects of VBCMh's Compliance Plan is crucial to its success. In order to evaluate the effectiveness of the Plan, VBCMh will employ a variety of monitoring and auditing techniques, including but not limited to, the following:

- ◆ Periodic interviews with VBCMh personnel regarding their perceived levels of compliance within their departments or areas of responsibilities;
- ◆ Information gained from written reports and assessment tools developed to track all areas of compliance;
- ◆ Annual contract monitoring of performance of its contracted providers;
- ◆ Audits designed and performed by internal and/or external auditors utilizing specific compliance guidelines;
- ◆ Investigations of alleged noncompliance reports;
- ◆ Exit interviews with departing VBCMh employees; and
- ◆ Annual audit of "Staff/Client Access Tracking" report, per staff member

Information obtained through monitoring and auditing efforts will be retained in written form and provided to the VBCMh Compliance Committee.

VBCMh's CCO will evaluate, no less than biannually, the effectiveness of the Code of Conduct and other Compliance policies and procedures. The results of all monitoring and audit evaluations will be presented to the Compliance Committee for interpretation and determination of recommended amendment(s) and/or remediation/disciplinary actions. If modifications and/or remediation action is determined, VBCMh's CCO and the Compliance Committee are required to perform ongoing monitoring of the issue for compliance.