POLICIES AND PROCEDURE MANUAL

Chapter:	**Compliance**		
Section:	**Compliance and Program Integrity**		
Policy: ☒ **Procedure:** ☐ **Page:** 1 of 3	**Review Cycle:** Biennial **Author:** Chief Compliance & Quality Officer	**Adopted Date: 11.2013** **Review Date:** 11.10.2026	**Related Policies:** Compliance Reporting & Investigations Compliance Line External Quality Review

Purpose

To ensure that Mid-State Health Network (MSHN) conducts all aspects of service delivery and administration with integrity, in conformance with the highest standards of accountability and applicable laws, while utilizing sound business practices, through the development of and adherence to its Corporate Compliance Plan (CCP), guaranteeing the highest standards of excellence.

Policy

A. Corporate Compliance:

- MSHN shall establish, implement and maintain a region-wide Corporate Compliance Plan that is in accordance with federal and state statutes, laws and regulations. MSHN will furthermore adhere to regulations required by the Attorney General's Office, Office of Inspector General, Centers for Medicaid and Medicare, and relevant accrediting bodies.
- The MSHN Corporate Compliance Plan provides the framework for MSHN to comply with applicable laws, regulations and program requirements, minimize organizational risk, maintain internal controls and encourage the highest level of ethical and legal behavior.
- MSHN, and the CMHSP Participants and the SUD Provider Network, shall have policies and procedures necessary to comply with the MSHN CCP and shall ensure effective processes for identifying and reporting suspected fraud, abuse and waste, and timely response to detected offenses with appropriate corrective action.
- MSHN, and the CMHSP Participants and the SUD Provider Network, shall each identify a Corporate Compliance Officer who is responsible for developing and implementing policies, procedures, and practices designed to ensure compliance with the requirements of the contract and MSHN's Corporate Compliance Plan.
- MSHN, and the CMHSP Participants and the SUD Provider Network, shall have a compliance committee at the senior management level charged with overseeing the agencies compliance program.
- MSHN, and the CMHSP Participants and the SUD Provider Network, shall provide staff and board member training in compliance with the CCP and will maintain records of staff attendance. Trainings shall include but are not limited to: Federal False Claims Act, Michigan False Claims Act and Whistleblowers Protection Act.
- MSHN, and the CMHSP Participants and the SUD Provider Network, shall require all Board members, employees and contractors to comply with corporate compliance requirements including any necessary reporting to other agencies.

- MSHN, and the CMHSP Participants and the SUD Provider Network, shall review the compliance activities at least annually.
- The CMHSP Participants and the SUD Provider Network will participate in the annual review of the MSHN CCP and provide recommendations for revisions as needed.
- MSHN leadership will promote compliance among employees through the following:
    - Reviewing and approving MSHN's Compliance Plan, policies and procedures
    - Dedicating sufficient resources to provide monitoring and oversight of compliance related activities
    - Empowering the Compliance Officer with the authority to carry out duties and responsibilities defined as part of the compliance program
    - Modeling ethical behavior
    - Establishing clear and accessible lines of communication that promotes reporting of suspected compliance matters
    - Promoting ongoing training
    - Ensuring an environment of accountability and consistency in areas of corrective action

B. Ethical Standards/Program Integrity

- All services within MSHN shall be provided with commitment to appropriate business, professional and community standards for ethical behavior.
- MSHN shall develop and maintain Standards of Conduct applicable to all MSHN staff and MSHN Board Members.
- MSHN shall conduct business with integrity and not engage in inappropriate use ofpublic resources.
- MSHN shall ensure that services are provided in a manner that maximizes benefit to consumers while avoiding risk of physical, emotional, social, spiritual,psychological or financial harm.
- All MSHN staff and MSHN Board Members shall conduct themselves in such a way as to avoid situations where prejudice, bias, or opportunity for personal or familial gain, could influence, or have the appearance of influencing, professional decisions.
- The CMHSP Participants and the SUD Provider Network shall have standards of conduct that articulate organization's commitment to comply with all applicable requirements and standards under the contract, and all applicable Federal and State requirements.

Applies to:

☒ All Mid-State Health Network Staff and Board Members
☐ Selected MSHN Staff, as follows:
☒ MSHN's CMHSP Participants: ☐ Policy Only ☒ Policy and Procedure
☒ Other: Sub-contract Providers

Definitions/Acronyms:

CCP: Corporate Compliance Plan
CMHSP: Community Mental Health Service Program
MDHHS: Michigan Department of Health and Human Services
MSHN: Mid-State Health Network
PIHP: Prepaid Inpatient Health Plan
SUD: Substance Use Disorder

Related Materials:

Mid-State Health Network Corporate Compliance Plan

References/Legal Authority:

1. Department of Health and Human Services, Office of Inspector General, Publicationof the OIG Compliance Program Guidance for Hospitals.
2. Michigan False Claims Act (Act 72 of 1997)
3. Michigan Whistleblowers Protection Act (Act 469 of 1980)
4. Deficit Reduction Act of 2005
5. State of Michigan/PIHP Contract: Schedule A: Statement of Work Contract Activities: R. Program Integrity
6. Code of Federal Regulations, Section 42: 438.608 – Program Integrity Requirements

Change Log:

Date of Change	Description of Change	Responsible Party
11.2013	New Policy	Chief Compliance Officer
11.2014	Annual Review	Chief Compliance Officer
11.2015	Annual Review & Updates	Director of Compliance, Customer Services & Quality
08.2016	Annual Review	Director of Compliance, Customer Services & Quality
08.2017	Annual Review	Director of Compliance, Customer Services & Quality
08.2018	Annual Review	Director of Compliance, Customer Services & Quality
09.2019	Annual Review	Director of Compliance, Customer Service, & Quality
08.2021	Bi-Annual Review; Updated references; added language consistent with 42 CFR	Chief Compliance and Quality Officer
08.2023	Biennial Review; Added reference to compliance with MSHNs Compliance Plan	Chief Compliance and Quality Officer
05.2026	Added language for leadership promoting compliance – required by OIG	Chief Compliance and Quality Officer