Section 7.9  Corporate Compliance

7.9.1  Introduction
The purpose of this policy is to describe the Arizona Department of Health Services/Division of Behavioral Health Services (ADHS/DBHS) expectations of Tribal/Regional Behavioral Health Authorities (T/RBHAs) to prevent, deter, and detect fraud, waste and program abuse as well as the requirements of T/RBHAs and T/RBHA contracted providers, in reporting to the Arizona Health Care Cost Containment System (AHCCCS) Office of the Inspector General (OIG) and ADHS/DBHS Bureau of Corporate Compliance (BCC).

The ADHS/DBHS Bureau of Corporate Compliance Program incorporates the required elements listed in 42 CFR §438.608 including: a Corporate Compliance Plan; Corporate Compliance Officer; a Corporate Compliance Committee; effective training and education, communication, monitoring/auditing; and effective written policies and procedures.

7.9.2  Terms
Definitions for terms are located online at http://www.azdhs.gov/bhs/definitions/index.php or http://www.narbha.org/for-providers/provider-resources/provider-policy-manual/definitions. The following terms are referenced in this section:

Fraud
Program Abuse
Waste

7.9.3  Procedures
a. The essential functions, policies, procedures, and initiatives that define an effective, robust Corporate Compliance program are found in the ADHS/DBHS Bureau of Corporate Compliance (BCC) Operations and Procedures Manual.

b. T/RBHAs are responsible for adhering to the policies, procedures, and initiatives found in the ADHS/DBHS BCC Operations and Procedures Manual. T/RBHAs are also accountable for all deliverables (as applicable) related to Corporate Compliance and preventing, deterring, and detecting fraud, waste, and program abuse as outlined in the ADHS/DBHS RBHA Contracts and (Tribal Behavioral Health Authority)TRBHA Intergovernmental Agreements (IGAs).
c. Reporting of fraud, waste and program abuse - Title XIX / XXI Funds
   i. T/RBHAs are required to report all suspected fraud, waste and/or program abuse involving any Title XIX/XXI funds to the AHCCCS Office of the Inspector General (OIG) within ten (10) business days of discovery. The methods for reporting are listed below:
      2. Email: AHCCCSFraud@azahcccs.gov
      3. Phone: (602) 417-4193 or (602) 417-4045
      4. Fax: (602) 417-4102

   ii. A copy of the referral, along with any and all supporting documentation, shall also be provided to ADHS/DBHS Bureau of Corporate Compliance using one of the methods as outlined in d.iv.

d. Reporting of fraud, waste and program abuse - Non-Title XIX/XXI or Grant Funds
   i. T/RBHAs are required to report all other instances of suspected fraud, waste and program abuse involving all funding sources other than Title XIX/XXI to ADHS/DBHS/BCC directly within ten (10) business days of discovery.
   ii. Reports to ADHS/DBHS/BCC shall be completed in written format using the approved designated ADHS/DBHS/BCC reporting form: Suspected Fraud and Program Abuse Report Form.
   iii. When reporting fraud, waste or program abuse of Non-Title XIX/XXI funds or grant funds, the report shall be submitted in a format which identifies and separates the amount(s) by each appropriate fiscal year.
   iv. The reporting format should also identify the different funding streams for each dollar amount and whether it was a claim or an encounter. The form may be submitted directly via any of the following methods:
      1. Mail: Arizona Department of Health Services
         Division of Behavioral Health Services
         Bureau of Corporate Compliance
         150 North 18th Avenue, Suite 250
         Phoenix, AZ 85007
      2. Email: ReportFraud@azdhs.gov
      3. Phone: (602) 364-3758 or 1-866-569-4927
      4. Fax: (602) 364-3940

e. AHCCCS-OIG Communications
   i. T/RBHAs shall report to ADHS/DBHS BCC, within ten (10) days of notification, any and all contact made by AHCCCS-OIG in reference to any open/closed fraud, waste and program abuse case, a voluntary self-disclosure settlement and/or any other type of fraud, waste and program abuse activity involving official communications by AHCCCS-OIG.
   ii. ADHS/DBHS BCC shall be advised of the final disposition of any case and/or settlement agreement made between the contractor and/or provider and AHCCCS-OIG.

7.9.4 References
The following citations can serve as additional resources for this content area:
42 CFR Part 455
7.9.5 PM Forms
None

7.9.6 PM Attachments
None

Reference ADHS/DBHS Policy 1502

Signature on file 07/15/14
Mary Jo Gregory Date
President and Chief Executive Officer