



Section 7.9 **Corporate Compliance**

7.9.1	Introduction
7.9.2	Terms
7.9.3	Procedures
7.9.4	References
7.9.5	PM Forms
7.9.5	PM Attachments

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).



PROVIDER MANUAL

- 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:
 - 1. Online form: <http://www.azahcccs.gov/fraud/reporting/reporting.aspx>
 - 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](#)



[42 CFR §438.608](#)

[ARS §36-2918.01](#)

[AHCCCS/ADHS Contract](#)

[ADHS/RBHA Contracts](#)

[ADHS/TRBHA IGAs](#)

[AHCCCS Contractor Operations Manual, Chapter 100](#)

7.9.5 PM Forms

None

7.9.6 PM Attachments

None

Signature on file

07/15/14

Mary Jo Gregory

Date

President and Chief Executive Officer

Reference [ADHS/DBHS Policy 1502](#)