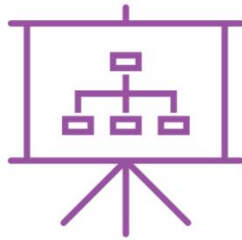


Community Based Care

Integrated Health

Compliance Program

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CBCIH Compliance Program

CBCIH Compliance Committee

- Oversees the CBCIH Compliance Program to ensure that standards are enforced with disciplinary guidelines, and within a code of conduct, which are made known to everyone involved in coordination activities on behalf of the CWSP.

Compliance Plan Components

- *Written policies and procedures*
- *Education and Training*
- *Process for Complaints and Grievances*
- *Code of Conduct*
- *Monitoring*
- *Assessment of Risk(s)*
- *Effective Communication*

CBCIH Compliance Activities

Contract Compliance Attestation

Annual CBC Lead Agency Compliance Audit

Quarterly Performance Monitoring

Training Initiatives and Activities

Communication

- *Annual Statewide Meetings*
- *Operational Meetings*
- *Care Coordinator Meetings*
- *Post-Adoption Specialists Meetings*
- *Healthcare Performance Meetings*
- *Vendor Compliance Meetings*

CBCIH Compliance Committee Meetings

Reporting Requirements

CBC Lead Agencies should report concerns to the Community Based Care Integrated Health, CBCIH Director of Quality and Compliance/HIPAA Privacy Officer, and, upon request, to the Sunshine Health Compliance Department.

1. Potential data breaches and inadvertent disclosures of personal health information (PHI)

Including documentation and tracking of each instance, as well as other HIPAA Privacy concerns

2. Potential Quality of Care Incidents (PQI), Adverse/Critical Incidents

In accordance with CBCIH policies and procedures for Incident Reporting, via the Integrate[®] Notify application

3. Potential Fraud, Waste and Abuse

Report compliance issues to CBCIH Director of Quality and Compliance/HIPAA Privacy Officer via the Compliance Hotline at 1-321-207-8330. You may also report via email to compliance@cbcih.com.

Privacy and Security Practices

Purpose:

- Ensure that CBCIH and the CBC Lead Agencies comply with laws and regulations concerning privacy and the protection of information
- Protect the rights and privacy of children and families in the process of gathering and disseminating information

All information regarding enrolled members and their families (past, present and future children and/or their relatives) is considered to be confidential and is covered CBCIH's Compliance Policy.

Each CBC Lead Agency should adhere to their individual organization's Privacy and Security policies and procedures related to HIPAA.

CBC Lead Agencies are considered "downstream" entities from Sunshine as the main contractor for Medicaid/Medicare, and as a downstream vendor, certain additional requirements are applicable, as indicated within the Florida Managed Medical Assistance Program Services Agreement.

Annual HIPAA and Security Awareness Training is required.

Potential Quality of Care Incidents (PQI)

- **PQI** is any alleged act or behavior that may be detrimental to the quality or safety of patient care; is not compliant with evidence-based standard practices of care; or that signals a potential adverse, critical or sentinel event.
- **Critical/Adverse Incidents** involve the injury of a member occurring during the delivery of a service that Sunshine Health covers, including incidents occurring in the following reimbursable facilities, programs, or services:
 - Statewide Inpatient Psychiatric Programs (SIPP)
 - Specialized Therapeutic Group Homes (STGC)
 - Specialized Therapeutic Foster Care (STFC)
 - Medical Foster Care (MFC)
 - Inpatient Hospitalization (IP)
 - Outpatient Treatment Services (OP)
 - Substance Abuse Treatment Services (SA)
- **Sentinel Events** are Critical Incidents required to be reported for all CWSP enrollees, and include: Enrollee Injury, Enrollee Elopement, Medication Error, Hospital-acquired Disease
- CBCIH requires that Community Based Care Lead Agencies have procedures and processes related to submission of PQI for CWSP enrollees. Reports should be submitted to CBCIH for review electronically, utilizing the CBC Lead Agency's internal reporting mechanism and format.
- The CBC shall report all PQIs and Critical/Adverse Incidents in accordance with, and as defined by, SH and CBCIH policies and procedures, via the CBCIH designated process immediately, but no later than within 8 hours of becoming aware of the incident.
- Within eight (8) hours of receipt of a PQI Report, CBCIH submits the PQI report via the Integrate[®] Notify Application.

Fraud, Waste and Abuse Reporting

- **Potential Fraud, Waste or Abuse** may be reported to CBCIH Director of Quality and Compliance/HIPAA Privacy Officer at 1-321-207-8330. You may also report via email to compliance@cbcih.com.
- Once you make a report to CBCIH, you may additionally report suspected fraud, waste, abuse, or neglect in the Medicaid Child Welfare Specialty Plan in one of the following avenues:
 - Sunshine Health Corporate Compliance: 1-866-685-8664
 - Sunshine Health Compliance Officer: 1-866-796-0530
 - Sunshine Compliance email: compliancefl@centene.com
 - AHCA Consumer Complaint Hotline: 1-888-419-3456
 - Florida Attorney General's Office: 1-866-966-7226
 - Florida Medicaid Program Integrity Office: 1-850-412-4600

Annual Fraud, Waste, and Abuse Training is required.

Member Complaints and Grievances

- Complaint—A complaint is any oral or written expression of dissatisfaction by a member submitted to the Health Plan or to a state agency (e.g., AHCA). It must be resolved by Sunshine Health within **one business day** following receipt or it must be managed as a grievance.
- Grievance—A grievance is an expression of dissatisfaction about any matter other than an adverse decision to a prior authorization request.

Sunshine Health does not delegate member complaints or grievances to CBCIH; however, CBCIH and the CBC Lead Agencies are required to notify the Health Plan if a member voices a complaint, grievance or appeal and are responsible for responding to the Health Plan, upon request.

Upon a CBC Lead Agency's learning of a potential issue, please report the complaint to CBCIH immediately. The information will be communicated to Sunshine Health via the Integrate[®] Notify Application, and Sunshine Health will address the issue and follow the AHCA process. CBCIH staff will be available for consultation to review and/or participate in the MDT or case staffing process, for enrollees who may be impacted or involved.

Code of Conduct and Disciplinary Standards

- Maintain a posture of positive motivation with employees and sub-contractors
- Treat all employees and sub-contractors fairly, consistently and equally
- Administer corrective action, where necessary, on a consistent basis.

Each CBC Lead Agency should adhere to their individual organization's Code of Conduct and subsequent policies and procedures related to disciplinary actions. CBC Lead Agencies are considered "downstream" entities from Sunshine as the main contractor for Medicaid/Medicare, and as a downstream vendor, certain additional requirements are applicable, as indicated within the Florida Managed Medical Assistance Program Services Agreement and in accordance within the CBC Lead Agency Annual Contract Compliance Attestation.

Code of Conduct and Disciplinary Standards (continued)

CBCIH and our Lead Agency sub-contractors should conduct themselves in a manner that is consistent with the NAHQ Code of Ethics which includes, but is not limited to, the following:

- *Practicing with honesty, integrity, and accountability*
- *Seeking the trust and confidence of all consumers and stakeholders*
- *Respecting all laws and avoiding involvement in any false, fraudulent, or deceptive activity*
- *Promoting the right of privacy for all individuals and protecting the maintenance of confidential information to the fullest extent permitted by law*
- *Using expertise to inform employers or clients of possible positive and negative outcomes of decisions in an effort to facilitate informed decision making*
- *Giving credit for the work of others to whom it is due*
- *Aiding the professional development and advancement of colleagues*

CBCIH Compliance Department Overview

Reporting of Compliance Issues

Report compliance issues to CBCIH Director of Quality and Compliance/HIPAA Privacy Officer via the Compliance Hotline at 1-321-207-8330. You may also report via email to compliance@cbcih.com.

CBCIH Director of Quality and Compliance/HIPAA Privacy Officer:
Shivana Gentry

HIPAA Security Officer:
Chad Collins

CBC
Attestation

CBCIH
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