

SBHO Compliance Plan Checklist FY 2018-2019

Compliance Activity	Network Contractor or Subcontractor	Monitoring Mechanism
Duty to Notify Regarding Legal Status		
Disbarment (OIG) <i>Included in annual Administrative Review</i>	KMHS	Annual Admin. Reviews and Monthly Attestation
	JMHS	Annual Admin. Reviews and Monthly Attestation
	RMH	Admin. Review, as indicated
	WEOS	Annual Admin. Reviews and Monthly Attestation
	PCMHC	Annual Admin. Reviews and Monthly Attestation
	CommCare	Annual Sub delegation Reviews (URAC accredited, annual URAC review) and Monthly Attestation
	True Star	Annual Admin. Reviews and Monthly Attestation
	Cedar Grove	Annual Admin. Reviews and Monthly Attestation
	Olympic Personal Growth	Annual Admin. Reviews and Monthly Attestation
	Reflections	Annual Admin. Reviews and Monthly Attestation
	Specialty Services	Annual Admin. Reviews and Monthly Attestation
	Beacon of Hope	Annual Admin. Reviews and Monthly Attestation
	Agape Unlimited	Annual Admin. Reviews and Monthly Attestation
	Cascadia-Bountiful Life	Annual Admin. Reviews and Monthly Attestation
	Kitsap Recovery Services	Annual Admin. Reviews and Monthly Attestation
West Sound Treatment Center	Annual Admin. Reviews and Monthly Attestation	
Status of License <i>Included in annual Administrative Review</i>	KMHS	Annual Admin. Reviews
	JMHS	Annual Admin. Reviews
	RMH	Admin. Review, as indicated
	WEOS	Annual Admin. Reviews
	PCMHC	Annual Admin. Reviews

Compliance Activity	Network Contractor or Subcontractor	Monitoring Mechanism
	CommCare	Annual Subdelegation Reviews (URAC accredited, annual URAC review)
	True Star	Annual Admin. Reviews and Monthly Attestation
	Cedar Grove	Annual Admin. Reviews and Monthly Attestation
	Olympic Personal Growth	Annual Admin. Reviews and Monthly Attestation
	Reflections	Annual Admin. Reviews and Monthly Attestation
	Specialty Services	Annual Admin. Reviews and Monthly Attestation
	Beacon of Hope	Annual Admin. Reviews and Monthly Attestation
	Agape Unlimited	Annual Admin. Reviews and Monthly Attestation
	Cascadia-Bountiful Life	Annual Admin. Reviews and Monthly Attestation
	Kitsap Recovery Services	Annual Admin. Reviews and Monthly Attestation
	West Sound Treatment Center	Annual Admin. Reviews and Monthly Attestation
	Confidentiality	
SBHO Oath of Confidentiality Training & Statement Signed	SBHO Staff: current staff	Review SBHO files annually
	SBHO Staff: <i>new hires</i>	Within 30 days of hire
	Advisory Board: current members	Review SBHO files annually
	Advisory Board: <i>new members</i>	Within 30 days of member appointment
	QRT: current members	Review SBHO files annually
	QRT: <i>new members</i>	Within 30 days of member appointment
	Ombuds: current staff	Review files annually
	Ombuds: <i>new staff</i>	Within 30 days of hire

Compliance Activity	Network Contractor or Subcontractor	Monitoring Mechanism
SBHO HIPAA Training	SBHO Staff: Current staff	Quarterly Fliers/Newsletters
	SBHO Staff: <i>new hires</i>	Within 30 days of hire
Network Agency HIPAA Training <i>Included in annual SBHO Administrative Review</i>	PCMHC	Annual Admin. Reviews
	KMHS	Annual Admin. Reviews
	JMHS	Annual Admin. Reviews
	RMH	Admin. Review, as indicated
	WEOS	Annual Admin. Reviews
	CommCare	Annual Subdelegation Reviews (URAC accredited, annual URAC review)
	True Star	Annual Admin. Reviews
	Cedar Grove	Annual Admin. Reviews
	Olympic Personal Growth	Annual Admin. Reviews
	Reflections	Annual Admin. Reviews
	Specialty Services	Annual Admin. Reviews
	Beacon of Hope	Annual Admin. Reviews
	Agape Unlimited	Annual Admin. Reviews
	Cascadia-Bountiful Life	Annual Admin. Reviews
	Kitsap Recovery Services	Annual Admin. Reviews
West Sound Treatment Center	Annual Admin. Reviews	
Investigate HIPAA Complaint & Reporting Procedures <i>Review Agency Procedures/Trends</i>	QUIC	Per incident, monthly meetings
	UM Committee	Per incident, monthly meetings
	Network Contractors	Annual Admin. Reviews
	Network Subdelegation	Annual Reviews
	Board Members	Per incident, monthly meetings
Internal (SBHO) HIPAA Security Reminder	SBHO Staff	Quarterly
	QUIC	Quarterly
	UM Committee	Quarterly
Business Associate Agreements	KMHS	Verified completed: 4/1/2016
	JMHS	Verified completed: 4/1/2016
	RMH	Verified completed: 4/1/2016
	WEOS	Verified completed: 4/1/2016
	PCMHC	Verified completed: 4/1/2016
	Ombuds	Verified completed: 4/1/2016

	Tribes	Verified completed: 6/15/06
	CommCare	Verified completed: 4/1/2016
	True Star	Verified completed: 4/1/2016
	Cedar Grove	Verified completed: 4/1/2016
	Olympic Personal Growth	Verified completed: 4/1/2016
	Reflections	Verified completed: 4/1/2016
	Specialty Services	Verified completed: 4/1/2016
	Beacon of Hope	Verified completed: 4/1/2016
	Agape Unlimited	Verified completed: 4/1/2016
	Cascadia-Bountiful Life	Verified completed: 4/1/2016
	Kitsap Recovery Services	Verified completed: 4/1/2016
	West Sound Treatment Center	Verified completed: 4/1/2016
Medicaid Fraud and Abuse Contractor/Subcontractor Business Records		
Review of Reported Incidents to SBHO Corporate Compliance Officer	UMC & Clinical Directors Committee	Once per year to review trends (RSN to statewide and historical) Reviewed: Spring 2018
SBHO Administrative Review	KMHS	Annual Admin. Reviews
	JMHS	Annual Admin. Reviews
	RMH	Admin. Review, as indicated
	WEOS	Annual Admin. Reviews
	PCMHC	Annual Admin. Reviews
	True Star	Annual Admin. Reviews
	Cedar Grove	Annual Admin. Reviews
	Olympic Personal Growth	Annual Admin. Reviews
	Reflections	Annual Admin. Reviews
	Specialty Services	Annual Admin. Reviews
	Beacon of Hope	Annual Admin. Reviews
	Agape Unlimited	Annual Admin. Reviews
	Cascadia-Bountiful Life	Annual Admin. Reviews
	Kitsap Recovery Services	Annual Admin. Reviews
West Sound Treatment Center	Annual Admin. Reviews	
Compliance Activity	Network Contractor or Subcontractor	Monitoring Mechanism
	KMHS	Quarterly, as required by contract

Provider R&E Reports	JMHS	Quarterly, as required by contract
	WEOS	Quarterly, as required by contract
	PCMHC	Quarterly, as required by contract
Clinical Chart Reviews <i>Including Data Integrity/ Verifying Encounters</i>	KMHS	Annual Reviews
	JMHS	Annual Reviews
	WEOS	Annual Reviews
	PCMHC	Annual Reviews
	RMH	100% chart review, accompanies Admin Review
	True Star	Annual Reviews
	Cedar Grove	Annual Reviews
	Olympic Personal Growth	Annual Reviews
	Reflections	Annual Reviews
	Specialty Services	Annual Reviews
	Beacon of Hope	Annual Reviews
	Agape Unlimited	Annual Reviews
	Cascadia-Bountiful Life	Annual Reviews
	Kitsap Recovery Services	Annual Reviews
	West Sound Treatment Center	Annual Reviews
Federal Block Grant Fiscal Review	KMHS	Annual Fiscal Review and quarterly deliverable reports
	JMHS	Annual Fiscal Review and quarterly deliverable reports
	WEOS	Annual Fiscal Review and quarterly deliverable reports
	PCMHC	Annual Fiscal Review and quarterly deliverable reports
	Dispute Resolution Center (Ombuds)	Monthly Activity Reports, Annual Admin. Review , and quarterly deliverable reports
	North Olympic Healthcare Network	Annual Fiscal Review and quarterly deliverable reports
	Olympic Personal Growth	Annual Fiscal Review and quarterly deliverable reports
	West Sound Treatment Center	Annual Fiscal Review and quarterly deliverable reports
	Agape Counseling	Annual Fiscal Review and quarterly deliverable reports
	Beacon of Hope	Annual Fiscal Review and quarterly deliverable reports
	Reflections Counseling	Annual Fiscal Review and quarterly deliverable reports

	Lutheran Community Services N.W.	Annual Fiscal Review and quarterly deliverable reports
Review Provider Annual Financial Audits	KMHS	Annual Fiscal Review
	JMHS	Annual Fiscal Review
	WEOS	Annual Fiscal Review
	PCMHC	Annual Fiscal Review
	True Star	Annual Fiscal Review
	Cedar Grove	Annual Fiscal Review
	Olympic Personal Growth	Annual Fiscal Review
	Reflections	Annual Fiscal Review
	Specialty Services	Annual Fiscal Review
	Beacon of Hope	Annual Fiscal Review
	Agape Unlimited	Annual Fiscal Review
	Cascadia-Bountiful Life	Annual Fiscal Review
	Kitsap Recovery Services	Annual Fiscal Review
	West Sound Treatment Center	Annual Fiscal Review
Provider Performance Reports	KMHS	Quarterly
	JMHS	Quarterly
	WEOS	Quarterly
	PCMHC	Quarterly
	RMH	when applicable
	True Star	Quarterly
	Cedar Grove	Quarterly
	Olympic Personal Growth	Quarterly
	Reflections	Quarterly
	Specialty Services	Quarterly
	Beacon of Hope	Quarterly
	Agape Unlimited	Quarterly
	Cascadia-Bountiful Life	Quarterly
	Kitsap Recovery Services	Quarterly
West Sound Treatment Center	Quarterly	
SBHO Review of Compliance Plan		
SBHO Corporate Compliance Officer		Reviewed: 5/2018
SBHO Quality Improvement Committee		Reviewed: 11/09, 11/2011, 7/2013
SBHO Compliance Committee		Reviewed: 11/2012, 11/2013, 12/2014,8/2017
SBHO Review of Compliance Charter		

SBHO Compliance Committee	Finalized: 4/2013 Reviewed: 9/2014, 4/2015	
SBHO Code of Conduct		
Code of Conduct Attestation	KMHS	Annual Admin. Reviews and Monthly Attestation
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Kitsap Recovery Services	Annual Admin. Reviews and Monthly Attestation	
Internal (SBHO) Code Of Conduct	SBHO Staff: current staff	Review SBHO files annually
	SBHO Staff: <i>new hires</i>	Within 30 days of hire
	Advisory Board: current members	Review SBHO files annually
	Advisory Board: <i>new members</i>	Within 30 days of member appointment
	QRT: current members	Review SBHO files annually

	QRT: <i>new members</i>	Within 30 days of member appointment
	Ombuds: current staff	Review files annually
	Ombuds: <i>new staff</i>	Within 30 days of hire