



# North Sound BH-ASO Annual Compliance Report

## 2020

Program Integrity

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NORTH SOUND BEHAVIORAL HEALTH  
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# North Sound Annual Compliance Report

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## Table of Contents

Executive Summary.....	3
Data and Analysis.....	3
Compliance Training.....	3
Compliance Cases.....	4
Compliance Case Trend.....	4
Compliance Case Reported By.....	5
Compliance Case Reason.....	6
Compliance Hotline and Email Use.....	6
2020 Program Updates.....	7
Policies, Procedures, and Standards of Conduct.....	7
Compliance Officer and Compliance Committee.....	7
Compliance Training and Education.....	7
Effective Lines of Communication.....	7
Monitoring and Auditing.....	8
Discipline Guidelines.....	8
Investigation Process.....	8

# North Sound Annual Compliance Report

## 2020

### Executive Summary

The North Sound BH-ASO Program Integrity Plan serves as the guiding document for all compliance and program integrity activities overseen by the North Sound BH-ASO Compliance Officer. The Compliance Officer is responsible for ensuring that each activity outlined in the plan is carried out in an efficient and effective manner. The Program Integrity Plan outlines the seven (7) elements of an effective compliance program and how North Sound BH-ASO operationalizes achieving each element. These seven elements are not only a standard at North Sound BH-ASO but are also required for each North Sound BH-ASO contractor. The seven elements are:

1. The program must implement policies, procedures, and standards of conduct.
2. The program must have a designated compliance officer and compliance committee.
3. The program must provide compliance training and education to staff and subcontractors.
4. The program must provide effective lines of communication for reporting compliance issues.
5. The program must continually monitor risk through an effective monitoring and auditing plan.
6. The program must develop and publicize discipline guidelines.
7. The program must have a process to detect, track, and respond to potential compliance offenses.

North Sound BH-ASO's Program Integrity program prides itself on having a transparent process whereby issues of concern can be brought to the attention of the Compliance Officer and dealt with according to the processes outlined in policy and the Program Integrity Plan.

2020 represented the first full calendar year in which North Sound BH-ASO operated as an administrative services organization. This change has led to a substantial decrease in network oversight for the organization. All concerns regarding Medicaid funded services are to be sent to the Managed Care Organization (MCO) responsible for providing the funding. The responsibilities of North Sound BH-ASO are outlined in contract with the Health Care Authority (HCA) and represent the updated responsibilities of an ASO in an integrated system.

### Data and Analysis

#### Compliance Training

North Sound BH-ASO requires all staff, providers, and Board of Directors members to participate in annual compliance training. This training goes through the basic elements of a compliance program and the laws associated with fraud, waste, and abuse and HIPAA regulations.

#### 2020 Compliance Training

	North Sound BH-ASO Staff	Provider Agencies	North Sound BH-ASO BOD
Number to be Trained	22	14	25
Number Trained	22	12	18
Percentage Trained	100%	86%	72%

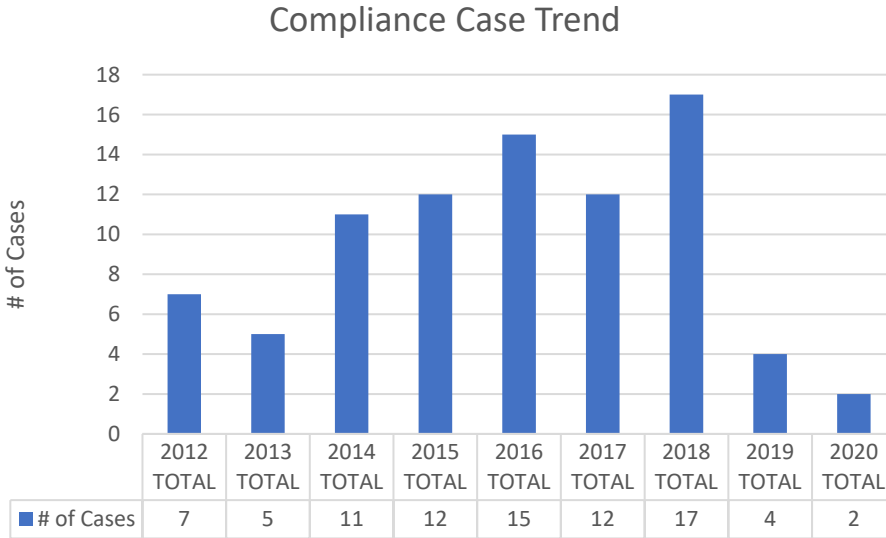
The expectation for conducting compliance training is 100% compliance annually. North Sound BH-ASO staff are at 100% compliance and will therefore need no action to be taken. Since provider agencies are at 86% compliance North Sound BH-ASO will need to implement corrective action with those agencies that did not provide training for 2020 as a condition of their contract. The remaining seven (7) members of the North Sound BH-ASO BOD will need to receive training as soon as possible to ensure compliance.

# North Sound Annual Compliance Report 2020

## Compliance Cases

North Sound BH-ASO has a database process that has been tracking compliance concerns since 2012. This allows us to track trends and conduct individual case analysis on previous issues if necessary. There are multiple data points that allows the Compliance Officer to identify opportunities for training and steps in the process that may need updating.

## Compliance Case Trend

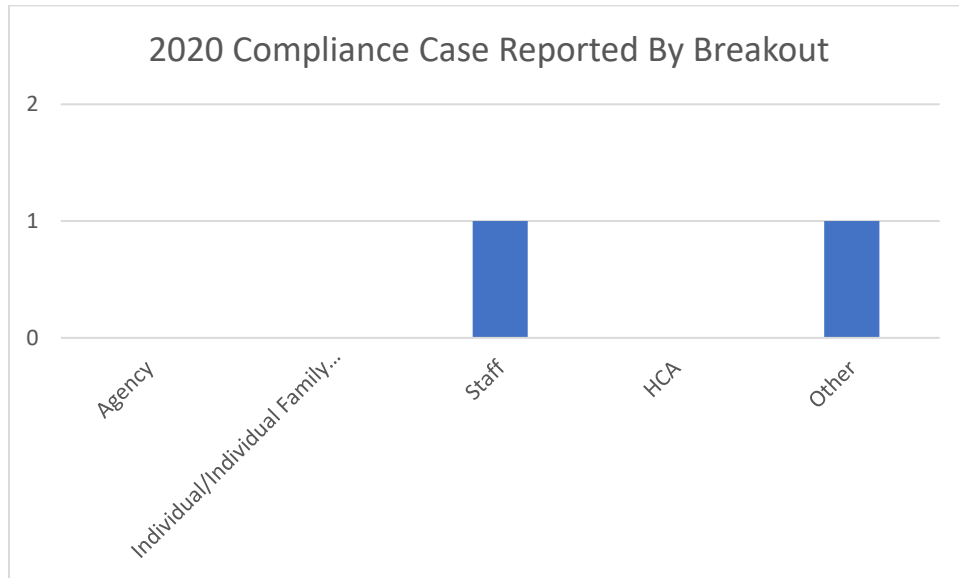


The graph above shows the compliance case trend from 2012 through 2020. In the last two (2) years there has been a significant decrease in the number of cases reported or investigated by the North Sound BH-ASO Compliance Officer. The change in reporting mirrors the shift to integrated managed care in July 2019. When this change occurred the level of oversight for behavioral health services provided in the region shifted to the Managed Care Organizations (MCOs). North Sound BH-ASO does not provide oversight for Medicaid funding and does not receive the number of reports for potential compliance concerns as it had in previous years.

# North Sound Annual Compliance Report

## 2020

### Compliance Case Reported By

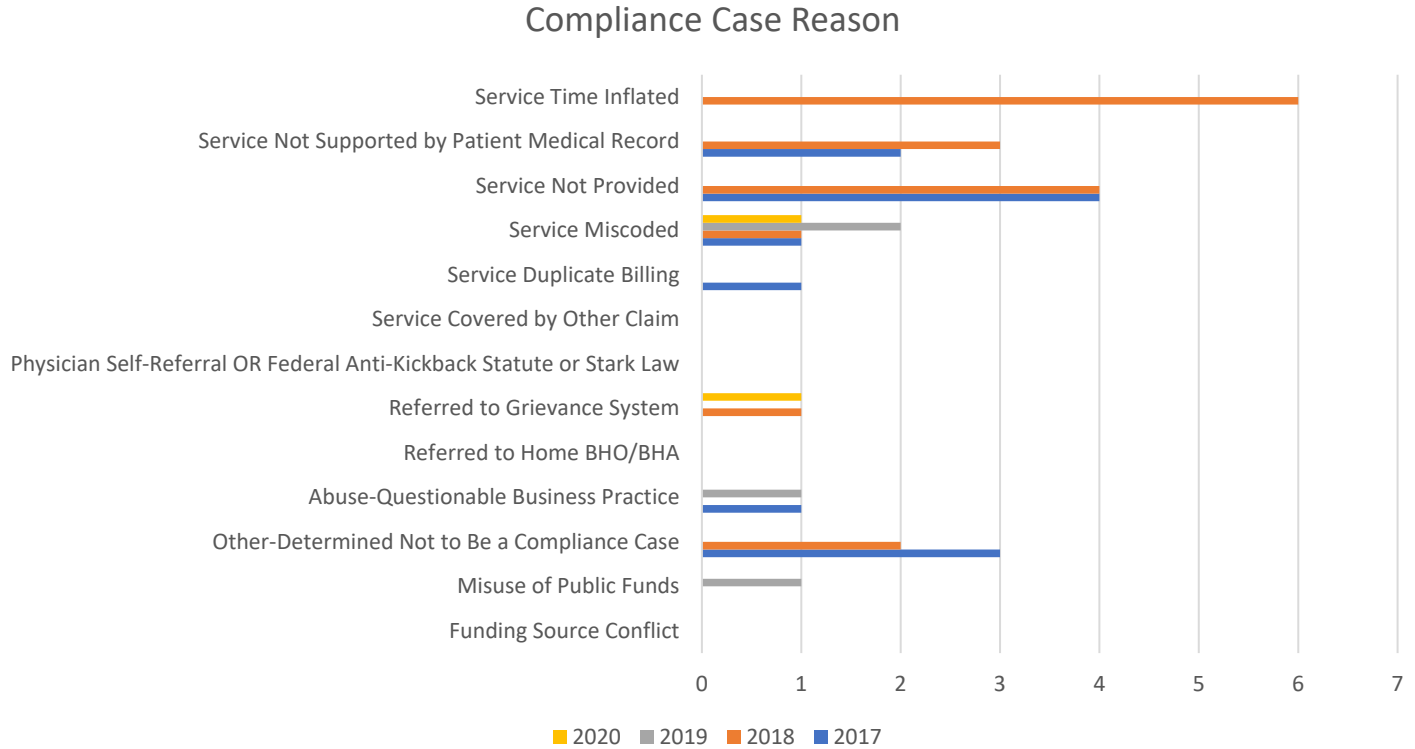


North Sound BH-ASO received two (2) reported compliance concerns in 2020. Of those concerns one (1) was reported by a staff member and one (1) was reported by an ex-employee of one of our provider agencies. Staff reporting has been the primary reporting source for the past four (4) years. As staff conduct reviews and provide oversight monitoring for their programs, they may uncover concerns that are brought to the Compliance Officer.

Due to the low number of case reports by agency staff or Individual/Family Members we have identified a potential opportunity to build further program awareness.

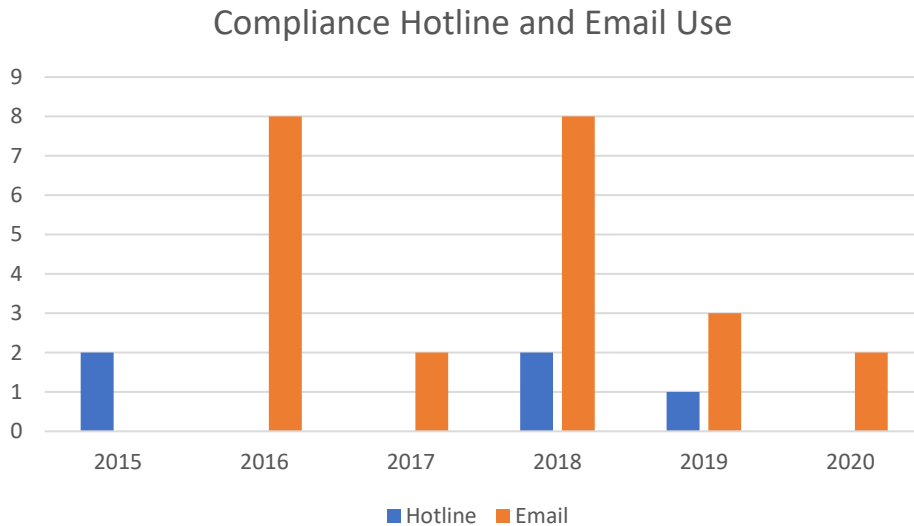
# North Sound Annual Compliance Report 2020

## Compliance Case Reason



The graph above outlines the compliance case reasons for the past four (4) years. In 2020 there was one (1) case that was reported as services being miscoded and there was one (1) case that was identified as an issue that belonged in the grievance system. Traditionally most cases reported have to do with service intensity and service provision. These were typical reasoning codes during the time of the BHO as Medicaid had strict guidelines on accurate billing and coding.

## Compliance Hotline and Email Use



# North Sound Annual Compliance Report

## 2020

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The graph above outlines how reports are made to the Compliance Officer. The Compliance Program advertises two (2) main reporting streams for individuals, providers, and staff to use to report compliance concerns. The Compliance Hotline and Compliance Officer Email are the two (2) main avenues for reporting compliance concerns. The Compliance Officer will also receive concerns in person, through fax, or through written mail. Half of the cases reported in 2020 were reported through the Compliance Officer Email. Having the ability to report through multiple mediums allows for an open-door approach to receiving compliance concerns.

## 2020 Program Updates

### Policies, Procedures, and Standards of Conduct

North Sound BH-ASO went through 3 iterations of policy changes during 2020 due to the changes outlined in the North Sound BH-ASO contract with HCA. These changes were made to *Policy 2001.00 Program Integrity* and were reflective of the ever-changing structure and process for reporting potential compliance issues to HCA. North Sound BH-ASO implemented *Policy 2002.00 Non-Retaliation* that describes the process used to ensure no individual is retaliated against should they report any concerns or issues regarding compliance.

North Sound BH-ASO will review and update, as necessary, the North Sound BH-ASO Program Integrity Plan and standards of conduct in 2021.

### Compliance Officer and Compliance Committee

In 2020 there was no change to either the North Sound BH-ASO Compliance Officer or Compliance Committee. The North Sound BH-ASO Compliance Officer became Certified in Healthcare Compliance (CHC) certified in 2020 to represent a significant step in ensuring an effective Program Integrity program is in place. The North Sound BH-ASO Internal Quality Management Committee (IQMC) continues to serve as the Ethics and Compliance Committee for the organization.

### Compliance Training and Education

North Sound BH-ASO is responsible for conducting annual compliance training to all staff and Board of Directors members to ensure they are up to date as to their role in reporting potential violations and how to identify issues of concern. There is an expectation to have 100% participation in the training annually. During 2020 it was difficult to get 100% participation by Board of Directors members due to competing priorities. North Sound BH-ASO will work with those members that did not complete the training to provide an alternative method in Quarter 1, 2021.

North Sound BH-ASO provider agencies are required to submit an annual attestation stating they conducted compliance training with all of their staff. They are also required to keep records of the training in case an audit was to occur. Those agencies that did not submit the attestation will be placed in corrective action for non-compliance in Quarter 1, 2021.

### Effective Lines of Communication

North Sound BH-ASO continues to have an open-door policy when it comes to reporting issues of concern for compliance. The North Sound BH-ASO Compliance Officer is available by phone, email, in person, or anonymous hotline. In 2020 there was one (1) case reported through the Compliance email and one (1) case reported in person. Due to the low number of cases, it is difficult to determine if the multiple mediums for reporting is effective. North Sound BH-ASO continuously promotes the use of the Compliance Hotline and email through the monthly provider bulletin. In 2021 the Compliance Officer will determine if further marketing of reporting methods is necessary.

# North Sound Annual Compliance Report

## 2020

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### Monitoring and Auditing

During 2020 North Sound BH-ASO conducted a Program Integrity Audit on its three (3) contracted crisis providers. This included a review of their Compliance Program policies and procedures, a review of their monthly conducting of exclusionary checks, a review of their training documents, and a review of adherence to the seven (7) elements of an effective compliance program. These reviews required a submission of documents and a review of personnel files.

All three (3) agencies required remedial action and developed corrective action plans in response to the audit score sheet provided to them. After a review of each agency's corrective action plan, they were all determined to be 100% compliant with the elements listed in the audit. North Sound BH-ASO will continue to monitor the agencies annually.

North Sound BH-ASO also conducts monthly exclusionary checks on all staff members, contractors, and vendors to ensure they are eligible to participate in the receipt of Federal and State funds. Throughout 2020 North Sound BH-ASO identified several potential matches but verified each individual to not be a match using personal identifiable information. North Sound BH-ASO providers are required to conduct monthly exclusionary checks on all of their employees and submit an attestation to the North Sound BH-ASO Compliance Officer. Any provider that does not submit their attestation for three (3) consecutive months is placed in remedial action.

North Sound BH-ASO will be conducting an updated risk assessment in 2021 to ensure we are adapting to newly identified threats. New consideration must be given for the change in funding due to the integration and the risk of working remotely due to the COVID-19 pandemic.

### Discipline Guidelines

North Sound BH-ASO has not updated its discipline guidelines regarding Program Integrity. All enforcement and discipline guidelines can be found in the North Sound BH-ASO Program Integrity Plan.

### Investigation Process

The investigation process is outlined in the Program Integrity plan and Policy 2001.00. These processes delineate the role of the North Sound BH-ASO Compliance Officer, Ethics and Compliance Committee, and HCA. The process in 2020 has not changed from previous years. The overall process will continue to be reviewed as updates come through North Sound BH-ASO contracts with HCA.