



POLICY TYPE:

Corporate

Divisional

EFFECTIVE DATE:

May 12, 2014

INITIAL APPROVAL DATE:

May 12, 2014

NEXT REVIEW DATE:

May 2017

POLICY NUMBER:

5524

REVISION APPROVAL DATE: 5/14, 11/14, 4/15, 4.16

APPLIES TO PRODUCT TYPE:

Medi-Cal CMC

PAGE:

1 of 3

POLICY APPLIES TO:

All Divisions and Departments

CLASSIFICATION SERIES:

Compliance

SUBJECT:

Compliance Issues Oversight Policy and Procedures

Policy:

In order to effectively track issues that come to the attention of Compliance, the Compliance Issues Log was created. This log houses all information concerning the issue summary, the business areas affected, the member impact and the resolution. This information will be gathered by the Compliance Managers and populated using an Issues Tracking Tool. This log will be used to alert the Operations Committee of issues that arise regarding products and services. Regular updates are required to ensure that issues are resolved quickly and completely.

This policy applies to the activities of the Compliance staff. It is the responsibility of all Compliance staff to report issues identified on the Compliance Issues Log. The process for the business area to report issues to the applicable Compliance Manager is not covered by this policy.

Definitions:

Issue - Any problem, concern or notice affecting the compliance with regulations of a product, service or function.

Issue Oversight Manager - The Compliance Manager who has been tasked with maintaining and populating the Compliance Issues Log.

Compliance Manager - This term is used to describe any member of Compliance. This includes Compliance Managers, and Compliance Policy Analysts.

Procedure:

Action	Process Steps	Responsible Party
I. Issue is received by Compliance	<p>A. Compliance identifies issues through several means:</p> <ul style="list-style-type: none"> ● Routine monitoring and auditing by Compliance Managers or Audit Team; ● Internal monitoring or audits conducted by the business area and reported to Compliance; or ● Reported to CHG by customers, CMS or other third parties. <p>B. Issues that are discovered by Compliance Managers must also be reported to the Compliance Officer.</p>	Compliance Managers
2. Issued Summarized	<p>A. Upon notification of an issue, the Compliance Manager or Compliance Officer must summarize the issue, providing details regarding the issue, corrective actions and solutions.</p> <p>B. Summary of the issue must be sent electronically to the Issue Oversight Manager.</p>	Compliance Manager
3. Issue Entered into log	The Issue Oversight Manager enters the issue into the Compliance Issues Log	Issue Oversight Manager



Action	Process Steps	Responsible Party
4. Issues Tracking Tool is Completed	A. Compliance Manager completes all required information on Issue Tracking Tool. The tool should be completed within two business days. B. Completed Issue Tracking Tool must be sent electronically to the Issue Oversight Manager.	Compliance Manager
5. Maintaining of the Issues Tracking Tool	Completed Issues Tracking Tool will be stored electronically on the Compliance network shared drive.	Issues Oversight Manager
6. Issue is Updated in Log	When the Issue Tracking Tool is received, the information originally entered into the Compliance Issues Log will be updated.	Issue Oversight Manager
7. Issue is Reported to Senior Management (and CMS if necessary)	Issue Oversight Manager must populate Sanctions Remediation Log with issue details provided in the Issues Tracking Tool.	Compliance Officer
8. Reporting to CMS	Compliance Officer to discuss new issues with senior management and determine if issue warrants reporting to CMS. The issue is reported to CMS, date of communication will be noted on both the Compliance Issues Log.	Compliance Officer
9. Tracking of Reporting to CMS	If the issue is reported to CMS, Issue Oversight Manager will update information in Compliance Issues Log indicating date of reporting.	Issue Oversight Manager
10. Weekly Reminder	Issue Oversight Manager will set up weekly reminder on calendar of Compliance Manager with oversight over the issue. Reminder will notify Compliance Manager of the need to update the Compliance Issues	Issue Oversight Manager
11. Issue Follow Up	Compliance Managers, who have oversight over the area where the issue occurred, must provide regular updates on the status of the issue to the Issue Oversight Manager.	Compliance Managers
12. Issue Closure	Once the issue is considered to be closed, the Issues Oversight Manager will indicate such on both the Compliance Issues log.	Issue Oversight Manager



Exhibits:

Exhibit 1 - Issues Tracking Tool

Access Privileges: All _____

Regulatory:

NCQA:

Attachments: None

Policy Status: Signed (Signature on File) Active Draft Policy in Development

Approved By: Signature: _____

Department Head: Chief Compliance & Regulatory Affairs Officer

Date: _____

Signature: _____

Division Chief : Chief Executive Officer

Date: _____