

**PARTNERSHIP HEALTHPLAN OF CALIFORNIA
POLICY / PROCEDURE**

Policy/Procedure Number: CMP-01			Lead Department: Administration	
Policy/Procedure Title: Compliance Program			<input type="checkbox"/> External Policy <input checked="" type="checkbox"/> Internal Policy	
Original Date: 04/27/2006		Next Review Date: 08/18/2026		
		Last Review Date: 08/18/2025		
Applies to:	<input checked="" type="checkbox"/> Medi-Cal	<input type="checkbox"/> Healthy Kids	<input checked="" type="checkbox"/> Employees	
Reviewing Entities:	<input type="checkbox"/> IQI	<input type="checkbox"/> P & T	<input type="checkbox"/> QUAC	
	<input type="checkbox"/> OPERATIONS	<input type="checkbox"/> EXECUTIVE	<input type="checkbox"/> COMPLIANCE	<input type="checkbox"/> DEPARTMENT
Approving Entities:	<input type="checkbox"/> BOARD	<input checked="" type="checkbox"/> COMPLIANCE	<input type="checkbox"/> FINANCE	<input type="checkbox"/> PAC
	<input checked="" type="checkbox"/> CEO	<input type="checkbox"/> COO	<input type="checkbox"/> CREDENTIALING	<input type="checkbox"/> DEPT. DIRECTOR/OFFICER
Approval Signature: Sonja Bjork, CEO			Approval Date: 08/18/2025	

I. RELATED POLICIES:

N/A.

II. IMPACTED DEPTS.:

All.

III. DEFINITIONS:

N/A.

IV. ATTACHMENTS:

N/A.

V. PURPOSE:

To establish Partnership HealthPlan of California’s (Partnership) compliance standards and enforcement of employees, temporary personnel, volunteers, interns, health care providers, subcontractors, delegates, and/or a member of the Partnership Board of Commissioners compliance with ethical standards, compliance policies and guiding principles, contractual obligations, accreditation standards, and all applicable statutes, regulations, and rules pertaining to Partnership’s Medi-Cal line of business.

VI. POLICY / PROCEDURE:

A. Policy.

1. Compliance Program Governance, in compliance with DHCS Medi-Cal Contract 23-30236, Exhibit A, Attachment III, 1.3.1 (A):
 - a. Partnership shall establish a compliance program, including the development and maintenance of the compliance program structure and written compliance information and documentation to govern the program, which includes, at a minimum;
 - i. Compliance policies and procedures;
 - ii. Compliance plan, which details; program elements, code of conduct, compliance independence from operations, reporting structure, delegation oversight structure, and key policies and procedures.;
 - iii. Designation of a Compliance Officer;
 - iv. Compliance committee and, as appropriate, subcommittees;
 - v. Delegation Oversight and Reporting Plan;
 - vi. Compliance Oversight Committee comprised of Board members;
 - vii. Code of Conduct; and
 - viii. Open lines of communication between the compliance officer and employees;

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- ix. Effective systems for auditing and monitoring;
- x. System for responding to identified compliance issues, which includes submitting Corrective Action Plans when appropriate;
- xi. Well-publicized enforcement standards; and
- xii. Compliance training.
- b. Partnership shall review and, as needed, revise the written compliance program materials at least once annually and more frequently as changes occur in Partnership's needs and/or obligations, based on all applicable statutes, regulations, and rules pertaining to Partnership Medi-Cal line of business.
- c. Partnership's Compliance Committee and Board of Commissioners shall review and approve the Compliance Plan annually in accordance with the terms and conditions of this policy.
- d. To ensure awareness of and compliance with Partnership's compliance program, the Compliance Committee, chaired by the Compliance Officer, shall support:
 - i. Partnership's maintenance of a compliance program and implementation of compliance initiatives;
 - ii. Implementation and maintenance of related compliance program materials;
 - iii. Ongoing and open communication regarding compliance matters among management, those responsible for the internal compliance function, Partnership workforce, and the Commission; and
 - iv. Perform any other duties as directed by the Commission.
- 2. Participation in the Compliance Program
Regulatory Affairs & Compliance, with oversight and direction of the Compliance Officer or their designee, shall annually review and amend the Compliance Plan, compliance training, compliance policies, and the Code of Conduct, as appropriate, to maintain compliance with contractual obligations, all applicable accreditation requirements, statutes, regulations, and rules pertaining to PHC Medi-Cal line of business.

B. Procedure.

- 1. Regulatory Affairs and Compliance (RAC) Program Responsibilities
 - a. Regulatory Affairs & Compliance, with oversight and direction of the Compliance Officer or their designee, shall annually review and amend the Compliance Plan, compliance training, compliance policies, and the Code of Conduct, as appropriate, to maintain compliance with contractual obligations, all applicable accreditation requirements, statutes, regulations, and rules pertaining to PHC Medi-Cal line of business.
- 2. Compliance with the Program
 - a. In demonstration of commitment to understanding of and adherence with Partnership's compliance program and in addition to completing mandatory compliance training, Partnership's Board of Commissioners, employees, temporary personnel, and interns shall annually review and acknowledge understanding of Partnership's Compliance Plan and Code of Conduct.
 - b. RAC, in collaboration with Human Resources and/or the Clerk of the Board, shall assign and maintain a record of Partnership workforce and Commission members' Compliance Plan and Code of Conduct attestations at the time of hire or appointment, annually after that, and ad hoc as deemed necessary.

VII. REFERENCES:

- A. 20245 Compliance Plan
- B. DHCS Medi-Cal Contract 24-30236, Exhibit A, Attachment III, 1.3.1

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VIII. DISTRIBUTION:

- A. SharePoint
- B. Directors

IX. POSITION RESPONSIBLE FOR IMPLEMENTING PROCEDURE:

Compliance Officer

X. REVISION DATES:

Medi-Cal

03/02/2010, 12/06/2011, 12/04/12, 12/01/2015, 12/06/2016, 11/15/2017, 11/21/2019, 08/20/2020, 08/19/2021, 08/18/2022, 8/17/2023, 08/15/2024, 08/18/2025

PREVIOUSLY APPLIED TO:

Partnership Advantage:

CMP-01 – 06/2006 to 01/01/2015

Healthy Families:

CMP-01 – 10/1/2010 to 03/01/2013

Healthy Kids

CMP-01 – 04/27/2006 to 12/01/2016