



## Policy 5.04: Compliance and Risk Management Program

<b>Status:</b> ADOPTED	<b>Original Adopted Date:</b> 03/21/2017
<b>Last Revised Date:</b> 08/18/2020	<b>Last Reviewed Date:</b> 07/01/2022

### Policy:

It is the policy of Bridge Health to establish and publish the official policy regarding the organization's Compliance and Risk Management Program.

Bridge Health is dedicated to the delivery of services to those with Behavioral, Addictive Disease, and Developmental Disabilities. Services are provided in an environment characterized by strict conformance with the highest standards of accountability for administration, clinical, business, marketing and financial management. Bridge Health's leadership is fully committed to the need to prevent and detect waste, fraud, abuse and other wrong doing. The Compliance and Risk Management Program conducts ongoing monitoring and conformance with all legal and regulatory requirements. Further, the organization is committed to the establishment and implementation of a program that emphasizes (1) prevention of wrongdoing — whether intentional or unintentional, (2) immediate reporting and investigation of questionable activities and practices without consequences to the reporting party and (3) timely correction of any situation which puts the organization, its leadership or staff, funding sources or Individuals at risk. The program ensures that Bridge Health complies with local health, fire, and safety regulations and implements an effective accident prevention and loss control plan.

The Compliance and Risk Management Program is responsible for assessing the effectiveness of all programs established to enhance safety at Bridge Health. The Program includes policies and procedures that relate to safety and risk management within the agency, as well as ongoing reviews of various safety-related issues through routine monthly meetings. Reports of adverse incidents and individual deaths are also presented to the Leadership Team and to the Board of Directors on an ongoing basis.

### Procedure:

By formal resolution, the Board of Directors has delegated overall responsibility for the Compliance and Risk Management Program to the Chief Executive Officer (CEO). The CEO will formally designate a Corporate Compliance Officer, monitor the organization's program, and provide periodic and regular reports to the Board of Directors.

The Corporate Compliance Officer (CCO) shall (1) chair the Risk Management Committee and serve as the organization's primary point of contact for all corporate compliance issues, including scheduling meetings, reporting on team activities, and making recommendations to the CEO as required; (2) develop, implement and monitor — on a regular and consistent basis — the organization's Corporate Compliance Plan, Risk Management Plan, and Risk Assessment Matrix including all internal and external monitoring, auditing, investigative and reporting processes, procedures and systems; and (3) prepare, submit and present periodic reports to the CEO and/or the Board of Directors as may be required to provide clear communication to the organization's leadership for oversight.

The CCO shall submit a report to the Risk Management committee. Reports will include at a minimum: (1) a summary of allegations, investigations and/or complaints processed in the preceding month in conjunction with

the corporate compliance program, (2) a complete description of all corrective action(s) taken, and (3) any recommendations for changes to the organization's policies and/or procedures.

In the performance of his/her duties, the CCO shall have direct and unimpeded access to the CEO, Board of Directors, and the organization's accounting firm and/or legal counsel for matters pertaining to corporate compliance. The role of the compliance officer is advisory, however, and is not directly linked in supervision to direct care staff. Disciplinary actions shall be monitored and handled through the direct supervisor, Human Resources, and the CEO. The CCO shall help coordinate reviews by competent persons external to the organization. Such reviews will be conducted as a way to ensure ongoing conformance with billing, accounting, and collection regulations imposed by the federal government and other "third party" funding sources. More critically, these reviews will augment the organization's annual audit of its accounting system and provide an additional, internal measure to ensure conformance with billing and coding policies and practice that will withstand the scrutiny of any regulatory audit or examination. The CCO shall maintain the agency risk management plan. Additionally a Risk Register that will categorize the risks to the agency identified as high, moderate, and low. This plan will be updated at a minimum yearly to monitor regular and periodic review of all risk areas.

The Risk Management Committee shall formally evaluate the effectiveness of the Risk Management Plan annually and report its findings to the Quality Management Council for the Bridge Health Annual Management Report. The functions of the Risk Management Committee are as follows:

1. Develop, monitor, and evaluate safety programs to ensure that the organization meets all regulatory and accrediting rules and standards.
2. Review all adverse incident reports.
3. Maintain a panel to review all motor vehicle accidents aimed at establishing whether the incident was preventable by the Bridge Health driver.
4. Ensure that corrective actions are taken, as appropriate, for any identified safety/risk management issue and that documentation of the quality improvement process is maintained.
5. Develop and maintain all safety, disaster, and emergency policies and procedures.
6. Monitor, through the on-site Safety Officer, all fire and emergency drills.
7. Ensure that periodic testing of emergency equipment occurs.
8. Review and approve any department or program-specific safety policies and procedures.
9. Oversee infection control policies, procedures, and activities.
10. Perform an ongoing, regular review of the safety program's effectiveness.
11. Set annual, agency-wide goals for safety and develop a plan to meet those goals.
12. Provide consultation to the Human Resources Department on aspects of safety and risk management training for new employees.

Bridge Health partners with the Georgia Department of Administrative Services (DOAS), the insurance provider for Bridge Health, in a joint effort to establish and maintain an effective Accident Prevention and Loss Control Plan with the goal of reducing risks and loss exposures imposed by the operations of Bridge Health. This partnership provides Bridge Health a Comprehensive Risk Survey by DOAS on request, enrollment in "Report My Driving Program" at no cost, and access to the DOAS Risk Management Services' free loss control training library. Bridge Health identifies and manages risk through insurance purchased from the State of Georgia's

Insurance Program. Insurance coverage includes General Liability, Workers Comp, Property, Business Interruption and Fidelity Insurance.

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Approved  
Heather Roesner, CEO

A handwritten signature in blue ink, appearing to read "Heather Roesner", is positioned below the typed name.