



City and County of San Francisco
London N Breed, Mayor

San Francisco Department of Public Health

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*Policy & Procedure Detail**

Policy & Procedure Title: Compliance Policy – Operation of a Compliance Program (COM6)	
Category: Compliance	
Effective Date: April 6, 2007	Last Reissue/Revision Date: November 16, 2022
DPH Unit of Origin: Compliance	
Policy Contact - Employee Name and Title; and/or DPH Division: Office of Compliance and Privacy Affairs	
Contact Phone Number(s): 855-729-6040	
Distribution: DPH-wide <input checked="" type="checkbox"/>	If not DPH-wide, other distribution:

**All sections in table required. Updated as of 11/16/2022*

1. Purpose of Policy

It is the policy of the San Francisco Department of Public Health (DPH) to maintain and operate a Compliance Program in accordance with Federal and State regulations and guidance (including the Federal Sentencing Guidelines) to address the increasing complexity of properly and accurately documenting, coding and billing for health care services. This policy applies to all DPH workforce members including employees, contracted staff, medical staff, interns, volunteers and other individuals representing or working at DPH. These individuals are collectively referred to as DPH staff in this document.

A. DPH Compliance Program Mission and Goals

The mission of the DPH Compliance Program is to ensure integrity in DPH clinical and business activities. This mission is carried out through a Compliance Office that is dedicated to the following goals:

1. To promote an understanding of and compliance with Medicare, Medi-Cal, and other applicable federal and state laws and regulations;
2. To use education and training to improve compliance with documentation, coding, billing and reimbursement rules and regulations; and
3. To work with providers, managers, and other members of the DPH workforce to integrate compliance into the daily operations of DPH.

The mission of the San Francisco Department of Public Health is to protect and promote the health of all San Franciscans.

We shall ~ Assess and research the health of the community ~ Develop and enforce health policy ~ Prevent disease and injury ~
~ Educate the public and train health care providers ~ Provide quality, comprehensive, culturally-proficient health services ~ Ensure equal access to all ~

2. Procedures

Compliance Program

DPH is committed to fully complying with all applicable federal and state statutes and regulations and demonstrating high ethical standards in everything we do. The Office of Compliance and Privacy Affairs (OCPA) oversees a program designed to prevent, detect, deter, and correct healthcare fraud, abuse and waste.

The basic elements of the DPH Compliance Program are as follows:

1. The commitment of leadership and the allocation of resources to staff the OCPA.
2. Development and maintenance of a Compliance Program, including a Code of Conduct, written policies and procedures, a coding compliance plan, and an annual risk assessment and work plan.
3. Providing an annual training tool for DPH staff regarding compliance matters, including the state and federal False Claims Act.
4. Making lines of communication available for DPH staff to report all known or suspected improper activities, with the option of remaining anonymous. This includes a confidential Compliance and Privacy Hotline at 855-729-6040. DPH has a strict non-retaliation policy for anyone who reports compliance violations.
5. Promptly investigating reports of violations of the DPH Compliance Program, Code of Conduct, DPH's policies, or federal or state laws and regulations related to billing for health care services.
6. Recommending appropriate discipline or taking corrective action for the failure of any DPH staff member to comply with the DPH Compliance Program, DPH Code of Conduct or its policies, or for violating any federal or state laws and regulations related to health care services, up to and including dismissal.
7. Identifying and auditing potential risk areas as appropriate.