
Series:	Operating Procedures	COA: RPM 1 & 2 CFOP: 175-04
Procedure Name:	Compliance Program	
Procedure Number:	OP1112	
Review Date:	11/26/19, 4/17/24, 09/24/2025	
Revision #/Date:	07/03/18 (2) 12/5/19, 05/28/25	
Effective Date:	06/13/17	
Applicable to:	Family Partnerships of Central Florida (FPOCF) Staff	

PURPOSE: The purpose of this procedure is to establish the method by which Family Partnerships of Central Florida (FPOCF) implements compliance efforts that establish a culture that promotes prevention, detection and resolution of instances of conduct that do not conform to Federal and State law, and Federal, State and private payor health care program requirements, as well as the organization's ethical and business policies.

PROCEDURE:

FPOCF has developed a comprehensive Compliance Program, which includes the following components to address all compliance-related activities and functions:

1. Fraud, Waste and Abuse Prevention, Reporting and Training
2. Privacy and Security Practices, including requirements for HIPAA training and completion of an Annual Risk Assessment
3. Compliance Program Training
4. Code of Conduct

Scope

This operating procedure applies to Family Partnerships of Central Florida and its subcontracted agencies who are responsible for children who are enrolled in the Child Welfare Specialty Plan. If any of the responsibilities outlined in this procedure are contracted with an individual or other entity, the contracted provider must ensure compliance with this procedure, and the terms should be incorporated into the contract.

Key Terms

Child Welfare Specialty Plan Enrollee—a child who is Medicaid eligible and is enrolled in the Sunshine Health, Child Welfare Specialty Plan, or the Sunshine Health Managed Medical Assistance Plan (MMA), due to an active status in the child welfare system of care. This includes children who have an open child welfare case, those who have been adopted from dependency, and those who are receiving extended foster care or independent living services.

Community Based Care Lead Agency—an “eligible lead community-based provider” as defined in Section 409.1671(1)(e), F.S.

Standards

In accordance with Sunshine Health requirements, and as part of an effective compliance process, FPOCF has developed a comprehensive Compliance Program.

1. As part of its commitment to Compliance, FPOCF has developed a formal plan for compliance that includes:
 - A. Establishment of a Compliance Committee to oversee conformance by the Company and its employees with legal, regulatory, and contractual requirements related to its Compliance Program (Please refer to the Compliance Committee Charter)
 - B. The development and distribution of written standards of conduct, as well as written policies and procedures, which promote commitment to compliance (Please refer to the FPOCF Code of Conduct and Disciplinary Standards)
 - C. The development and implementation of regular, effective education and training programs
 - D. The maintenance of a process, to receive complaints, and the adoption of procedures to protect the anonymity of the complainant and to protect whistleblowers from retaliation (Please refer to procedure 401, Critical Incident, Quality of Care Issues and Operational Concerns, and procedure 402, Fraud, Waste & Abuse Prevention, Reporting and Training (Anti-Fraud Plan))
 - E. The development of a system to respond to allegations of improper/illegal activities and the enforcement of appropriate disciplinary action against employees who have violated internal compliance policies, applicable statutes, regulations or Federal health care program requirements (Please refer to the FPOCF Code of Conduct and Disciplinary Standards)
 - F. The use of audits and/or other evaluation techniques to monitor compliance and assist in the reduction of identified problem areas
 - G. An Annual Risk Assessment, including but not limited to:
 - Review of operational goals and objectives to ensure quality services and to meet performance measures
 - Compliance with Fraud, Waste and Abuse procedures and assessment of FWA Program Effectiveness
 - Monitoring and oversight of subcontractors and adherence to contract requirements, performance standards and HEDIS measures
 - HIPAA compliance and adherence to Privacy and Security Practices
 - Review of practices related to Incident Reporting
 - Subcontractor hiring practices and enforcement of disciplinary measures
 - H. Annual Contract Compliance Attestation by Subcontractors to ensure compliance with:
 - Privacy and Security Practices
 - Employee Orientation and Training
 - I. Effective communication regarding:
 - Performance and issues with non-compliance
 - Program/plan updates
 - Policy and procedure development and revision
 - Quality of Care issues
2. The Sunshine Health Compliance Program is comprised of the following components, which are utilized to ensure contract compliance:
 - A. Requirement that an annual Contract Compliance Attestation is completed by FPOCF
 - B. Adherence to the Sunshine Health Compliance Audit Work Plan goals and objectives:

Audits of systems and process metrics against current Vendor Agreement requirements
Audit policies and procedures against Vendor Agreement requirements
1. Audit current training processes and frequency
2. Audit FWA annual training certification process
3. Audit monitoring process/tools for FDR subcontractors
4. Audit monitoring results compilation, corrective action plans and reporting process
5. Audit enrollment processes for improvements for Express Enrollment initiative
6. Audit processes to identify increase opportunities

C. Annual Compliance Monitoring: Sunshine Health conducts annual monitoring of FPOCF's compliance with the Services Agreement between FPOCF and Sunshine Health. FPOCF's required to sign an annual contract attestation, attesting to compliance with both Compliance Program requirements and compliance Operational Program requirements. This attestation is reviewed by the Contract Compliance Manager for verification and documentation supporting all the attested items is made to FPOCF and Sunshine Health upon request. This Attestation includes:

1. Compliance Program Requirements:

- Privacy and Security Practices-identification of a HIPAA Compliance Officer who is responsible for:
 - a. Developing and implementing Privacy and Security Policies and Procedures, including the process and tracking methods for data breaches and PHI disclosures
 - b. Distributing and posting of the Notice of Privacy Practices
 - c. Conducting an Annual HIPAA Security Audit (audit results will be forwarded to the Sunshine Health upon request)
- Providing Notification to and upon request to the Sunshine Health Compliance Department regarding:
 - a. Potential data breaches and inadvertent disclosures of personal health information (PHI), including documentation and tracking of each instance
 - b. Critical/Adverse Incidents in accordance with FPOCF policies and procedures for Incident Reporting
- FPOCF Behavioral Health Care and Nurse Coordinator Employee Orientation and Training
 - a. New Employee Orientation (within thirty (30) days of hire)
 - b. Annual Training
 - 1) Acknowledgement of Receipt of FPOCF policies and procedures (orientation only)
 - 2) HIPAA Privacy and Security Training/Certification (Orientation and Annually thereafter)
 - 3) Security and Information Training/Certification (Orientation and Annually thereafter)
 - 4) Fraud, Waste and Abuse Training/Certification (Orientation and Annually thereafter)

- D. FPOCF has developed effective lines of communication with Sunshine Health and CBC Lead Agencies for all compliance issues. The lines of communication consist of:
- Recurring meetings with all levels of leadership where compliance issues are discussed.
 - Regular meetings with CBC Lead Agency staff to discuss program benefits, procedures/processes and compliance issues.
 - Implementation of a process for distribution and tracking of policies, procedures and program updates (Please refer to the Policy and Procedure Status and Communication Tracking Form)
3. FPOCF has developed policies and procedures that are reviewed on a regular basis. The procedures are posted on the FPOCF website (www.FPOCF.com).
4. Annual training is provided to all FPOCF staff and subcontractors who may communicate with members. Compliance Program Training included, but is not limited to, the following areas:
- Code of Conduct and Discipline Standards
 - Privacy and Security Practices
 - Fraud, Waste and Abuse Reporting
 - Member Complaints and Grievances
 - Potential Quality of Care Incidents (PQI)

BY DIRECTION OF THE PRESIDENT AND
CHIEF EXECUTIVE OFFICER:



PHILIP J. SCARPELLI
President and Chief Executive Officer
Family Partnerships of Central Florida

APPROVAL DATE: 10/31/2025