San Francisco Department of Public Health

*Policy & Procedure Detail**

Policy & Procedure Title: COM.6 Operation of a Compliance Program	
Category: Compliance	
Effective Date: April 6, 2007	**Last Reissue/Revision Date:** 3/2/2026
DPH Unit of Origin: Compliance	
Policy Contact - Employee Name and Title; and/or DPH Division: Garrett Chatfield, Chief Integrity Officer and Director, Office of Compliance and Privacy Affairs (OCPA)	
Contact Phone Number(s): 855-729-6040	
Distribution: DPH-wide ☒	**If not DPH-wide, other distribution:**

All sections in table required.

I. **Purpose of and Scope:**

A. **Purpose:** The purpose of this policy is for San Francisco Department of Public Health (DPH) to establish, 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.

B. **Scope:** This policy applies to all DPH workforce members. Workforce members include DPH employees, UCSF employees providing services for DPH, contracted staff, medical staff, interns, volunteers and other individuals representing or working at DPH.

II. **DPH Compliance Program Mission and Goals:**

A. **Mission:** The mission of the DPH Compliance Program is to ensure integrity in DPH clinical and business activities.

B. **Goals:** This mission is carried out through the Office of Compliance and Privacy Affairs (OCPA) 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.

III. **Compliance Program Structure:**

A. 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) oversee the compliance 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, and an annual risk assessment and work plan.

3. Providing an education and training program 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 compliance policies, and/or federal or state laws and regulations related to billing for health care services.

6. Recommending appropriate discipline or implementing 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.

Last Reviewed/Revised Date: 4/6/2007; 11/16/2022; 2/5/2025; 3/2/2026