

## **Division of Public Health Administrative Manual**

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<b>Chapter:</b>	<b>Risk Management</b>
<b>Title:</b>	<b>Risk Management Program</b>
<b>Current Effective Date:</b>	<b>8/1/17</b>
<b>Revision History:</b>	<b>1</b>
<b>Original Effective Date:</b>	<b>4/29/08</b>

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### **PURPOSE**

The Division of Public Health (DPH) Risk Management Program (RMP) establishes the appropriate policies, procedures and validations to identify and address real and potential risks affecting the operation of the division.

### **POLICY**

The scope of the DPH RMP covers audit, monitoring, internal control, policy compliance, conflict of interest, and other areas that may represent threats to the successful operation of the division. Under the RMP, DPH publishes separate policies and procedures for audits, subrecipient monitoring, internal controls, conflict of interest, Medicaid False Claims Act compliance, and other areas as necessary. The program ensures that risks in DPH are identified and addressed, employee training is provided as needed, and DPH develops risk assessment capacity. The RMP ensures good communication throughout the division in identifying and managing risks.

### **ROLES AND RESPONSIBILITIES**

1. DPH employees are responsible for following the Code of Ethics and Conflict of Interest, and other related policies as appropriate to their job function.
2. Supervisors in DPH ensure employee training and compliance with policies and procedures.
3. The DPH Lead Monitor is responsible for ensuring plan updates, conducting staff training and oversight of DPH Subrecipient Monitoring activities.
4. The Compliance Manager provides training and monitoring for Medicaid False Claims Act compliance in DPH.
5. The Chief Budget Officer ensures appropriate policies, procedures and training sessions are available to ensure sound internal controls and to minimize the impact of risks on the division.
6. DPH adheres to the general policies regarding acquisition, maintenance, and disposal of fixed assets as outlined by the Office of the State Controller (OSC) in the North Carolina Accounting System (NCAS) State Information Guide (SIG), and the Administrative Policies and Procedures Manual to ensure that physical assets are protected.

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7. DPH adheres to the insurance procedures prescribed by the NC Department of Insurance (DOI) and as stewarded by DOI's Office of the State Fire Marshal. For additional information please see the North Carolina Department of Insurance State Property Fire Insurance Fund General Property Coverage Policy.
8. The Director, Legal and Regulatory Affairs works with DPH management, programs, and Office of the Attorney General's to ensure that the Division complies with federal and state statutory and regulatory requirements.
9. The DPH Privacy and Security Official and the DPH Compliance Manager ensure that all staff that receive privacy and security data follow appropriate safeguards, and follow all federal, state, and department standards to protect all to ensure the confidentiality, availability, and integrity of data in their possession.
10. The Business Continuity Coordinator ensures than all programs have a continuity plan to continue critical operations to normal business operations.
11. The Business Continuity Coordinator ensures that all division is backed up regularly and stored offsite and that critical application have a disaster recovery plan that tested regularly.
12. DPH adheres to federal, state, and department security requirements.

### PROCEDURE

The RMP is made up of several components. Each employee is expected to be familiar with the components of the DPH RMP, and to adhere to its concepts and practices. The components of the program are described below.

**Conflict of Interest/Code of Ethics** requirements are established in departmental and division level policies at the following links. These apply to all DPH personnel.

[DHHS \(Department of Health & Human Services\) Conflict of Interest Policy and Form DPH Code of Ethics](#)

**Medicaid False Claims Act Compliance** requirements apply to all personnel assigned to Early Intervention, Children's Special Health Services and State Laboratory in the Division of Public Health.

[DPH Medicaid False Claims Act Policy and Procedure Form ó Employee Notification](#)

### Subrecipient Monitoring

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[DHHS Monitoring of Programs](#)

[DPH Subrecipient Monitoring Plan \(Choose Monitoring and Compliance link\)](#)

**DOCUMENT HISTORY**

4/29/2008: Initial approval of procedure

8/1/2017: Revision 1