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Contract for Health Care in Jails Shows Compliance Adaptability, a GCPG Recommendation From OIG

By Nina Youngstrom

When Harris Health System in Texas got a contract to provide health care services at Harris County jails, it introduced challenges in both health care delivery and compliance. All of a sudden, compliance had to consider risks related to 10,000 inmates and the physicians, nurses, pharmacists and psychiatrists who would serve them.

It was a live-action version of one of the nine “primary responsibilities” of compliance officers cited in the HHS Office of Inspector General’s new *General Compliance Program Guidance*, said Carolynn Jones, chief compliance and risk officer at Harris Health System.^[1] Specifically, OIG said compliance officers are responsible for “revising the compliance program periodically in light of changes in the needs of the organization, applicable law, and policies and procedures of third-party payors.”

That perhaps is an understatement when it came to the contract with the Harris County Sheriff’s Office. Harris Health System agreed to provide health care services to inmates, who are screened at intake, entitled to health care on demand and treated for chronic conditions, Jones said. “It was almost as if we opened a new hospital.” Because of the volume of services, Harris Health hired more employees and added some of the sheriff’s employees who had been providing care. “The expansion of the workforce creates some risk,” Jones explained. “They were educated on our compliance program, and we hung up hotline posters in their breakroom.”

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