

Our Lady of Lourdes Health Care Services, Inc. and Affiliates
Administrative and General Policy

POLICY NUMBER: AS0042CCP
NURSING CODE: _____
PAGE NUMBER: 1 of 4

TITLE: Corporate Compliance Sub-Committee - Fiscal Affairs

ACCOUNTABILITY:

President and Chief Executive Officer

OBJECTIVES:

RELATION TO MISSION:

Our Lady of Lourdes, a Catholic Health System – a member of Catholic Health East – dedicated to its Franciscan Tradition of serving all, will demonstrate the value of **Integrity** by fostering an ethical and moral environment where the behavior of associates is positively impacted by adherence to the Corporate Compliance Sub-Committee – Fiscal Affairs policy.

RELATION TO OPERATION:

The Corporate Compliance Sub-Committee – Fiscal Affairs purpose is to provide Our Lady of Lourdes Health Care Services, Inc. and Affiliates (OLLHCS, Inc.) associates, agents and independent contractors guidance in carrying out our daily activities within appropriate ethical and legal standards.

I. POLICY

- A) OLLHCS, Inc. is dedicated to comply with all applicable legal requirements while conducting its business operations. It is the expectation that all associates, agents and independent contractors comply with all such requirements.
- B) The benefits of a compliance program are:
 - 1) Prevention and detection of any criminal, fraudulent, unethical and improper conduct by associates, caregivers, and agents
 - 2) Demonstrate to associates and the community at large OLLHCS, Inc.'s strong commitment to honest and responsible provider and corporate conduct
 - 3) Improve the quality, efficiency, and consistency of patient care

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- 4) Create a centralized source for distributing information on health care statutes, regulations, and other program directives related to fraud and abuse and related issues.
- 5) Formulate a methodology that encourages associates to report potential problems
- 6) Develop procedures that allow the prompt, thorough investigation of alleged misconduct by OLLHCS, Inc. officers, managers, associates, independent contractors, and consultants.
- 7) Initiate immediate, appropriate, and decisive corrective action
- 8) Minimize, through early detection and reporting, the loss to the government as well as private health care from false claims, and thereby reduce OLLHCS, Inc.'s exposure to civil damages and penalties, criminal sanctions, and administrative remedies, such as program exclusion
- 9) Enhance the structure of OLLHCS, Inc. operations.

C) The Compliance Program is not limited to Medicare issues but encompasses other legal requirements such as employment laws, hazardous waste, antitrust issues, and patient rights. Each associate is accountable to ensure that all requirements are met in all operational/organizational functions.

II. Corporate Compliance Sub-Committee – Fiscal Affairs:

A Corporate Compliance Sub-Committee – Fiscal Affairs (hereinafter referred to as the Committee) shall be appointed by Administration to oversee compliance with standards and procedures. This Committee has substantial influence over OLLHCS, Inc. and its policy making process, in order to minimize the risk of establishing any policy, procedure or process which is contrary to the intent of this policy.

A) Authority of the Committee:

- 1) The Committee operates autonomously, and is immune from punitive action that might be taken by Management or the Board of Trustees, when acting within the scope of its designated responsibilities under this policy. It is intended that the members of the Committee will feel free to take any action necessary to ensure OLLHCS, Inc. and its associates/agents comply with this policy and the spirit/letter of the law.

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- 2) Once per quarter, the chairperson of the Committee will report to the Corporate Compliance Sub-Committee all Fiscal Affairs Compliance statistics for the prior quarter, while maintaining the confidentiality of affected associates.
- 3) Once per quarter, the Committee will forward the quarterly report to the Corporate Compliance Sub-Committee.

B) Structure/Functions of the Corporate Compliance Sub-Committee – Fiscal Affairs:

- 1) **Membership:** The Committee shall consist of at least the following individuals:
 - (a) Senior Vice President Fiscal Affairs
 - (b) Assistant Vice President Fiscal Affairs
 - (c) Director of Compliance and Privacy Officer
 - (d) Director of Revenue Management and Compliance
 - (e) Director of Business Office
 - (f) Director of General Accounting
 - (g) Manager - Reimbursement
 - (h) Director(s) of Admissions
 - (i) Director of Medical Records
 - (j) LMA/HMSO Representative
 - (k) Osborn / HMSO representative
 - (l) CHAN Auditor

C) Primary Duties of the Committee:

- 1) To manage the training of all affected associates in the key elements of the compliance policies and procedures as they relate to the Fiscal Affairs function.
- 2) To identify areas of concern within OLLHCS, Inc., and suggest policies and procedures (or other actions) to address those concerns;
- 3) To respond to incidents of apparent wrongdoing;
- 4) To review, at the request of Administration, any allegations made against any associate or agent of OLLHCS, Inc. under this policy. Such review is not a requirement prior to disciplinary action being taken, and the Committee's review, if any, is merely advisory in nature.
- 5) The Committee will review all fraud alerts issued by the Department of Health and Human Services' - Office of Inspector General (OIG.) When conduct applicable to

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Fiscal Affairs is criticized in a Fraud Alert, it shall be the policy to cease such actions immediately, identifying a non-offensive alternative when possible.

- 6) Periodic testing of compliance is a required component of any Compliance Plan. This committee will determine how much monitoring is necessary, based on the perceived risk within OLLHCS, Inc.
- 7) The committee will review the OIG Work Plan each year and make recommendations based upon that review.

D) Reporting of the Committee:

- 1) The Committee will prepare a report, at least quarterly, to the Corporate Compliance Sub-Committee (Management Council) which may include a summary of compliance efforts, results of new initiatives, and proposed changes to the compliance programs that would enhance the compliance efforts and annual plans for the program for the up-coming year

APPROVED BY: _____
Alexander J. Hatala, President and Chief Executive Officer

ORIGINAL & REVISION DATES 12/23/03, 12/31/06

NEW EFFECTIVE DATE: 12/31/09

REQUIRES REAUTHORIZATION IN: 12/31/12

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