

Corporate Compliance Program - Structure and Purpose

MH Policy and Procedure

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General Description

Purpose: To define the purpose, structure, empowerment and responsibilities of the Corporate Compliance/Organizational Ethics Program at Meridian Health.

Scope: All Meridian-affiliated facilities, including but not limited to, hospitals, ambulatory surgery centers, outpatient imaging centers, home health agencies, long term care facilities, physician practices, service centers, imaging services, durable medical equipment/medical supply providers, and all Corporate and affiliated Departments.

Policy: The Corporate Compliance Program (CCP) was developed to provide consistent and accurate communication of corporate policies and procedures in the areas of compliance with federal and state laws, regulations and Meridian's Code of Conduct (Code). The CCP is intended to guide, direct and support each team member in undertaking responsibility for and support of an environment of compliance.

High standards of ethical conduct will be maintained in all practices including, but not limited to: patient care, admission, transfer, discharge, billing, marketing, and relationships with other healthcare providers, educational institutions, payers, contractors and vendors.

Elements of the program include setting standards (the Code and Policies and Procedures), communicating standards, education, providing a mechanism for reporting possible violations of Meridian's internal policies or external laws or regulations, monitoring and auditing to identify and address any potential instances of fraud or abuse of governmental health insurance programs, and maintaining an organizational structure that supports the furtherance of the program. These elements are detailed below.

Providing direction, guidance, and oversight of the CCP is the Compliance and Audit Committee of the Board of Trustees as designated by the Meridian Board and the Compliance Operations Group consisting of senior management. The Director of Corporate Compliance serves as the Compliance Officer for the organization. The Corporate Compliance/Internal Audit/Privacy (CCIAP) department is responsible for the day-to-day direction and implementation of the CCP. The CCIAP develops resources such as policies and procedures, training

programs, and communication tools including operating the ComplyLine (hotline), and conducts at least annual program assessments with such guides as the OIG annual workplan and supplemental compliance guidance.

Annual workplans are developed in accordance with and approved by the Compliance & Audit Committee of the Board of Trustees to insure focused monitoring of subject patient care services to detect potential issues of fraudulent or abusive coding or billing practices. The CCIAP department serves as a resource to team members regarding Meridian policies, procedures and regulatory matters.

REFERENCES:

Meridian Health Corporate Compliance Program: MHS-Admin-01-1006
42 U.S.C. §1320a-7b; 42 U.S.C. §1001.952(a)-(a); 42 U.S.C. §1395 nn; 66 Fed. Reg. 856, 961-962 (January 4, 2001); 69 Fed. Reg. 16054 (March 26, 2004)
Meridian Health Code of Conduct, Latest Revision: January 2008

Responsibility: Meridian Health Compliance Operations Group
Corporate Compliance Officer
Director of Internal Audit; Corporate Director of Data Security and Privacy

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Requirements

Approvals: Meridian Compliance Operations Group approved November 2006

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Authorization History

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