



St. Luke's Hospital

Origination: 12/2016

Last Approved: 12/2016

Last Revised: 12/2016

Next Review: 12/2019

Owner: *Rebecca Stevenson: Risk Manager*

Policy Area: *ORG: Compliance*

Committee Approval:

Compliance Plan Summary

PURPOSE:

St. Luke's Hospital and its subsidiaries (St. Luke's) is committed to Corporate Compliance and ensuring that we maintain a system of reasonable controls to support an effective compliance plan, which aids us in operating within the federal and state regulatory requirements. This policy lists the primary components of that plan for St. Luke's.

SCOPE & RESPONSIBILITY:

St. Luke's will maintain a Compliance Plan that addresses the seven elements as identified in most of the plan guidance documents issued by the Office of Inspector General of the Department of Health & Human Services. These include:

PROCEDURE:

1. Designation of a Compliance Officer and Committee
 - a. The Compliance Officer is responsible for the operation of the plan and chairs the Compliance Committee meetings at least quarterly and reports to the Board at least annually.
 - b. The committee will consist of representatives from Senior Leadership and Medical Staff Leadership and the departments of Legal Services, Finance, HIS, Coordination of Care, Human Resources and Quality. Other individuals may be added as deemed appropriate.
2. Policies and Standards
 - a. Minimum standards regarding Standards of Conduct, Patient Charging, Billing, and Re-imburement, Contracting and Other Ventures.
 - b. Departmental adherence to minimum standards set forth
3. Compliance Monitoring
 - a. Self-monitoring of identified departments
 - b. Consultant conducted audits
 - c. See Monitoring and Audit Service policies
4. Training
 - a. Training is provided through various means

- b. See Training policy

5. Reporting

- a. An anonymous hotline is maintained for use of all St. Luke's employees, members, patients, vendors etc. The phone number is (419)897-8462.
- b. Employees are encouraged to report concerns through 'normal' channels or contact the Compliance Officer directly.
- c. See Hotline policy.

6. Discipline

- a. Any employee found guilty of intentionally violating the St. Luke's Compliance Plan is subject to discipline, up to and including termination.
- b. See Human Resource policy

7. Remediation

- a. If violation of regulations is detected, appropriate remediation will be made within sixty (60) days after a thorough assessment and quantification is performed.
- b. See Remediation policy

It is imperative that St. Luke's remain compliant with all federal and state statutes however a compliance program too broad in scope will be ineffective. An effective compliance program too broad in nature will be ineffective. An effective compliance plan will be one that will address the issues most critical to St. Luke's, with the flexibility to add additional areas of concern. Areas currently considered most critical include:

1. False Claims – State and Federal statutes
2. Medicare and Medicaid Anti-kickback laws
3. Health Insurance Portability & Accountability (HIPAA)
4. Stark
5. Tax Exempt Standards
6. Fraud
7. Fair and Accurate Credit Transaction Act (FACTA)

Attachments:

No Attachments