

## NORTHCARE NETWORK

<b>POLICY TITLE:</b> Regulatory Compliance Program Policy	<b>EFFECTIVE DATE:</b> August 5, 2004
<b>DATE OF LAST REVIEW:</b> (Reviewed with no changes or minimal text revisions.) January 10, 2011	<b>DATE OF LAST POLICY REVISION:</b> (Revision to policy statement.) May 2, 2007

### **POLICY**

It is the policy of NorthCare Network to detect, investigate and report any suspected fraud, waste and abuse within the Network's operations. As an organization, NorthCare is committed to preventing fraud, abuse and waste while furthering its mission through maintaining a sound Compliance Program.

NorthCare requires all network providers billing or paying out \$5 million or more annually to have a formal compliance program. [Provision of the Deficit Reduction Act of 2005, signed into law Feb. 8, 2006] Providers not meeting this threshold are strongly encouraged and expected to have formal compliance efforts documented and implemented; and, are required to comply with NorthCare's Compliance Program.

### **PURPOSE**

To outline NorthCare requirements for Regulatory Compliance Programs.

### **APPLIES TO**

This policy applies to all employees, agents, volunteers, contract and sub-contractors of NorthCare Network, herein, referred to as "covered parties" for the purpose of NorthCare's Compliance Program.

### **EXPECTATIONS OF CONTRACT PROVIDERS**

It is the expectation that all contract providers within the NorthCare Network document and implement formal compliance efforts in accordance with local, state and federal laws and guidelines. It is understood that the extent of implementation will depend on the size and resources of the organization. NorthCare will monitor compliance efforts of each contracted provider organization during annual site reviews. An effective compliance program should include, but not be limited to:

- A. Implementing compliance and practice standards through the development of written policies, standards and procedures;
- B. Monitoring and auditing internal and sub-contract provider programs periodic audits;
- C. Designating a compliance officer or contact(s) to monitor compliance efforts and enforce practice standards;
- D. Conducting appropriate training and education on practice standards and procedures;
- E. Responding appropriately to detected violations through the investigation of allegations and the disclosure of incidents to appropriate Governmental entities, law enforcement, and/or appropriate stakeholders;
- F. Developing open lines of communication, e.g. (1) discussions at staff meetings regarding how to avoid erroneous or fraudulent conduct and (2) community bulletin boards, to keep employees updated regarding compliance activities;
- G. Enforcing disciplinary standards through well-publicized guidelines;

- H. Periodically evaluating the effectiveness of the organizations' compliance and ethics program; and
- I. Ensuring sub-contract language includes compliance obligations

NorthCare staff and the Compliance Committee shall make every effort to keep current regarding major issues identified by oversight agencies (e.g., Office of Inspector General (OIG), Centers for Medicare and Medicaid Services (CMS), and the Michigan Department of Community Health (MDCH).

### **REFERENCES**

- Deficit Reduction Act of 2005; Public Law 109-171- Feb 8, 2006
- Federal False Claims Act
- Michigan False Claims Act
- Whistleblowers' Protection Act 469 of 1980
- NorthCare Regulatory Compliance Program Plan
- NorthCare Code of Compliance Ethics
- NorthCare Regulatory Compliance Organizational Attestation Form
- NorthCare Regulatory Compliance Officer Attestation Form
- NorthCare Regulatory Compliance Program Policy
- NorthCare Regulatory Compliance Reporting Form
- NorthCare No Reprisal for Reporting Policy
- NorthCare Responding to Governmental Investigations Policy
- NorthCare Sanctions Policy

### **BOARD ADOPTED/REVIEWED DATE**

8/4/04; 5/2/07

### **COO APPROVAL**

1/13/11

### **HISTORY**

REVIEW DATES: 1/10/11

REVISION DATES: 4/10/10