
**DECKERVILLE COMMUNITY HOSPITAL
CORPORATE COMPLIANCE PLAN
2017**

Approved by:

Deckerville Community Hospital Board of Directors

Date: _____

Introduction

Deckerville Community Hospital (DCH) and its physicians' offices are dedicated to providing each patient/resident and their family with an outstanding experience, and to ensure the highest quality healthcare for the community. DCH and its physicians' offices are committed to conducting its business activities in full compliance with all federal, state and local laws and regulations. The Corporate Compliance Program has been established to ensure that each employee has a clear understanding of higher responsibility and acts accordingly. Each employee has an obligation to know and abide by the laws, rules, regulations, policies and procedures that have specific application to their job.

Deckerville Community Hospital (DCH) has designed and implemented a comprehensive Corporate Compliance Program that establishes various compliance procedures and structures, and sets forth the standards of conduct that all DCH Personnel are expected to follow in their employment or course of dealings with DCH or participation in the Medicare Shared Savings Program ("MSSP").

This Corporate Compliance Plan summarizes the structure, key elements, and compliance procedures of the Corporate Compliance Program.

Corporate Compliance Program Elements

The following eight elements describe the scope and operation of the Hospital's Corporate Compliance Program.

➤ **Element 1: Written Policies and Procedures.**

- The Code of Conduct and this Corporate Compliance Plan. DCH's Code of Conduct and this Corporate Compliance Plan are the core of DCH's Corporate Compliance Program. They will be made accessible on the DCH's website and via the intranet. DCH Personnel may also obtain copies of these and other Corporate Compliance Program documents from the DCH Compliance Office.
- ACO Compliance Policies and Procedures. In addition to DCH Code of Conduct and this Corporate Compliance Plan, DCH may develop and implement formal, written Compliance Policies and Procedures to describe in more detail existing DCH compliance processes and procedures and to otherwise underscore the DCH's commitment to compliance. DCH may, from time to time, adopt and rely upon a number of Policies and Procedures of the Corporate Compliance Program of any of its participants. In addition, DCH may utilize certain compliance

processes established by any of its participants, including for example, reliance on internal compliance audits conducted by a participant' compliance staff.

- Board of Directors Review. The Board of DCH will review at least annually the Corporate Compliance Plan, to discuss and approve any changes, if necessary, to these or any other Corporate Compliance Program documents.

➤ **Element 2: Oversight of the Corporate Compliance Program.**

- Compliance Officer. DCH has designated a Compliance Officer who oversees the operations of the Corporate Compliance Program. The DCH Compliance Officer reports directly to DCH's Board of Directors regarding compliance issues. The Compliance officer will not serve as legal counsel to DCH.
- The DCH Board of Directors. As the governing body of DCH, the Board of Directors has ultimate responsibility for oversight of the Corporate Compliance Program. As such, the Board will approve any substantive changes to the Code of Conduct or this Corporate Compliance Plan. In addition, it will receive periodic reports from the Compliance Officer as to the operation of the Corporate Compliance Program, as well as to the investigation and resolution of any material compliance issues that may arise.

Such reports will also include an annual presentation by the Compliance Officer of the Annual Compliance Work Plan for the upcoming year. At such annual presentations to the Board, the Compliance Officer will also report on the Corporate Compliance Program's performance during the prior year under the previous year's Annual Compliance Work Plan.

➤ **Element 3: Training and Education**

- Compliance Materials. The Compliance Officer is responsible for ensuring that the Code of Conduct and this Corporate Compliance Plan is made accessible to all DCH Personnel. All newly hired or engaged DCH Personnel must also be provided with the Code of Conduct and this Corporate Compliance Plan.
- Training – DCH. The DCH Compliance Officer will oversee the development of a schedule of training on compliance issues for DCH staff. The training should focus on the requirements most relevant to the trainee's particular job with DCH.

The Compliance Officer will maintain a record of all personnel who have attended such training.

- Follow-Up Training. The Compliance Officer will also ensure that any follow-up or remedial training that is required as part of the Corporate Compliance Program takes place.

➤ **Element 4: Communication Lines**

- Open Communication. Open Communication between DCH Personnel and the Compliance Officer, as well as between the Compliance Office and senior management and the Board of Directors, is important to the success of this Corporate Compliance Program and to the reduction of any potential for fraud, abuse, and waste. Without help from DCH Personnel, it may be difficult to learn of possible compliance issues and make necessary corrections.
- Questions. Any DCH Personnel may at any time seek clarification or advice from the Compliance Office with regard to the Corporate Compliance Program or any compliance questions or issues. Questions and responses will be documented by the Compliance Officer.
- Reporting. All DCH Personnel who are aware of or suspect acts of fraud, abuse, or waste or violations of DCH Compliance Code of Conduct are required to report such acts or violations. Several independent reporting paths are available:
 - 1) To Supervisors. DCH Personnel may but are not required to report to their supervisor or department director or manager. Supervisors and managers will refer the report to the DCH Compliance Officer as soon as the report is made.
 - 2) To the Compliance Officer. DCH Personnel may at any time report directly to the DCH Compliance Officer.
 - 3) To the DCH Compliance Hotline. All DCH Personnel can report any compliance concerns, issues or potential violations of ACO Corporate Compliance Program requirements to a 24-hour, 365-day hotline, known as the “Fraud Hotline” (1-855-FRAUD-HL or 1-855-372-8345). All such

reports will be handled pursuant to established protocols, and the DCH Compliance Officer will be informed of any relevant reported matters.

- Confidentiality. Reports received will be treated confidentially to the extent possible under applicable law. There may be a time, however, when an individual's identity may become known or have to be revealed (e.g. if governmental authorities become involved, in response to subpoena or other legal proceeding, or if in the process of the investigation the identity of the reporter cannot be kept anonymous).
- Documentation. The Compliance Officer will maintain a record of reports of violations of the Corporate Compliance Program and its Code of Conduct or of relevant law or regulations received by the Compliance Officer, who will periodically furnish a summary of such report of the DCH Board of Managers.

➤ **Element 5: Remedial or Disciplinary Action**

- Discipline of Employees. All DCH Personnel are subject to possible disciplinary action. Any such discipline will be applied in a uniform and consistent manner, equally to all employees within DCH, and may include discipline for:
 - 1) Failure to perform any obligation or duty required of employees relating to compliance with the DCH's Corporate Compliance Program or applicable laws or regulations.
 - 2) Failure of supervisory or management personnel to detect non-compliance with applicable policies and legal requirements and DCH's Corporate Compliance Program where diligence on the part of the manager or supervisor would have led to the discovery of any violations or problems.
- Procedure. Possible disciplinary action will follow the applicable DCH participant entity's existing disciplinary policies and procedures, including those found in the Medical Staff Rules and Regulations.
- Disclaimer. Nothing in the DCH Corporate Compliance Program shall (i) constitute a contract of or agreement for employment; or (ii) modify or alter in any manner any employee's at-will employment status. Any part of the Corporate Compliance Program may be changed or amended at any time without notice to any employee or DCH Personnel.

➤ **Element 6: Identification of Compliance Risk Areas and Non-Compliance**

- Tracking New Developments. The Compliance Office will ensure that all relevant publications issued by government or third-party payers regarding compliance rules and protocols are reviewed and appropriately implemented, focusing in particular on rules, regulations, and the operation of DCH.
- Compliance Review. The DCH Compliance Office will also ensure that compliance reviews are periodically conducted of DCH operations to ensure continued compliance with regulatory requirements. By way of example, such reviews may include:
 - 1) Reviews of the processes for submitting required certifications to Medicare to ensure that such certifications will be accurate and complete;
 - 2) Reviews of the processes for using or distributing shared savings dollars to ensure that such are compliant with the regulatory requirements and the methodology established by the Board of Directors; and
 - 3) Reviews to ensure that DCH Personnel have been appropriately checked against government exclusion lists or are otherwise appropriately licensed and credentialed.
- Annual Compliance Work Plan and Risk Assessment. On an annual basis, the DCH Compliance Officer will review regulatory requirement, governmental guidance or pronouncements, hotline calls, issues raised by DCH Personnel, and DCH operations to identify compliance risks or areas of compliance focus for the upcoming year.

➤ **Element 7: Responding to Compliance Issues**

- Investigation, Corrective Action and Responses to Suspected Violations. Whenever a compliance problem is uncovered, regardless of the source, Compliance Officer will first conduct a thorough investigation. Based on the results of the investigation, the Compliance Officer will ensure that appropriate and effective corrective action is implemented, as appropriate.

Any corrective action and response implemented must be designed to ensure that the violation or problem does not reoccur (or reduce the likelihood that it will

reoccur) and be based on an analysis of the root cause of the problem. If it appears that a larger, systemic problem may exist, then possible medication or improvement DCH's compliance or business practices will be considered. Possible changes or additions to policies and procedures will be reviewed with senior management and, if necessary, with the Board of Directors.

- External Reporting of Probable Violations of Law. If DCH discovers from any source credible evidence of misconduct related to DCH's operations and performance and, after a reasonable inquiry, believes that the misconduct represents a probable violation of law, DCH will promptly report the probable violation to the appropriate law enforcement agency within the appropriate period.

➤ **Element 8: Policy on Non-Retaliation.**

- Retaliation is Strictly Prohibited. There will be no intimidation or retaliation for good faith participation in the Corporate Compliance Program, including but not limited to reporting potential issues, investigating issues, self-evaluations, audits and remedial actions, and reporting to the government or accreditation agencies. Any ACO Personnel who makes an intentional false report or a report not in good faith may be subject to remedial or disciplinary action.