



Policy Title: Compliance and Privacy Committee			
Department Responsible: Compliance and Integrity	Policy Number: 1.70	THN's Effective Date: April 10, 2017	Next Review/Revision Date: February 2021
Title of Person Responsible: Compliance Officer	THN Approval Council & Date: Compliance and Integrity Committee-April 10, 2017	Date Approved by Board of Managers: August 22, 2017	Revision Approval Council: Policy Review Committee-February 13, 2018

PURPOSE:

To promote a culture of compliance and integrity within Triad Healthcare Network (THN) and with our business partners.

POLICY:

The Compliance and Privacy Committee is responsible for providing effective oversight of, and support for, compliance and privacy by operational area. Committee members are responsible to:

1. share information that pertains to the key drivers of fraud, waste and abuse (FWA),
2. participate in effective detection, prevention and recovery of risks,
3. monitor key performance indicators and corrective action plans, and
4. approve the annual Compliance and Privacy Work Plan.

PROCEDURE:

The Compliance and Privacy Committee will meet at least once per quarter or more frequently as necessary to enable:

1. reasonable oversight of the compliance program.
2. strategies to promote compliance and detect of any potential violations.
3. the review and approval of compliance and FWA training, and ensure that training and education are effective and appropriately completed.
4. development and implementation of the compliance risk assessment and the compliance monitoring and auditing work plan.
5. development, creation, implementation and monitoring of effective corrective actions.
6. innovative ways to implement appropriate corrective and preventive action.
7. effectiveness review of the internal controls designed to ensure compliance with Medicare Accountable Care Organization (ACO) regulations in daily operations.
8. support of the compliance officer's needs for sufficient staff and resources to carry out his/her duties.
9. appropriate and up-to-date compliance policies and procedures.
10. a system for employees, ACO Participants, ACO Providers/Suppliers, and others acting on behalf of THN to ask compliance questions and report potential instances of noncompliance, Medicare ACO program noncompliance, and FWA confidentially or anonymously without fear of retaliation.
11. a method for Medicare Beneficiaries to report potential FWA.



- 12. the review of audit reports, which include monitoring and auditing risks, program noncompliance, or potential FWA, and implement and monitor corrective action plans for effectiveness.
- 13. regular and ad hoc reporting on compliance status with recommendations to the Board of Managers.

RESPONSIBILITIES OF THE CHAIR

- 1. Effectively plan meetings, schedule meetings, develop the agenda, and ensure appropriate reports on compliance and ethics are presented.
- 2. Maintain a record of the meeting notes and any open items.

RESPONSIBILITIES OF THE MEMBERS

- 1. Support your Compliance and Privacy Program by attending the meetings or sending an appropriate representative to make decisions on your behalf.
- 2. Promote a culture of compliance and integrity by asking questions and raising issues.
- 3. Be prepared to discuss issues impacting your operational area.

MEETING LOGISTICS

- 1. The Committee will meet at least four (4) times per year and other meetings will be called as needed
- 2. Standing agenda topics include:
 - a. approval of previous meeting notes.
 - b. annual Work Plan Review and Updates.
 - c. the Privacy Report.
 - d. data movement review.
 - e. Compliance and Privacy Report to Board Of Managers (BOM).

Date	Reviewed	Revised	Notes
May 23, 2017	N/A	N/A	New Policy
February 15, 2018	Yes	Yes	Committee name change; Grammatical edits