



Policies and Procedures

Policy Title Compliance and Integrity			
Department Responsible Compliance and Integrity	Policy Code THN – 1.00	Effective Date May 2016	Next Review Date May 2017
Title of Person Responsible Compliance Officer	Approval Council Triad Healthcare Network Board of Managers		Approved Date May 24, 2016

PURPOSE

The purpose of his policy is to establish the framework for the Company's Compliance and Integrity Office program. Triad HealthCare Network, LLC (THN) an Accountable Care Organization (ACO), understands a strong compliance, ethics and integrity program is core to developing accountability and transparency. Additionally, THN understands that participation in federal programs is a tremendous responsibility and is committed to following the best practices and guidance from the United States Sentencing Commission and the Centers for Medicare & Medicaid Services.

DEFINITIONS

TERM	DEFINITION
ACO Participant	An entity identified by a Medicare-enrolled billing TIN through which one or more ACO providers/suppliers bill Medicare, that alone or together with one or more other ACO participants compose an ACO, and that is included on the list of ACO participants that is required under 42 C.F.R. § 425.118.
ACO Provider/Supplier	An individual or entity that: (1) is a provider or supplier under Medicare regulations; (2) is enrolled in Medicare; (3) bills for items and services furnished to Medicare fee-for-service beneficiaries during the agreement period under a Medicare billing number assigned to the TIN of an ACO participant; and (4) is included on the list of ACO providers/suppliers that is required under 42 C.F.R. § 425.118.
Policies and Procedures	THN's Corporate Compliance and Integrity Program Policies and Procedures.
Compliance and Integrity Program	THN's program to ensure compliance with applicable federal and state laws and regulations, and to promote ethical and lawful conduct.
Helpline	A toll-free telephone number by which any individual may confidentially and anonymously report activity that is believed, in good faith, to be a violation of applicable laws, regulations, or Compliance Policies and Procedures.
Contractor	An individual or entity that has a contractual relationship with THN, other than a direct employment relationship, to perform specified services for or on behalf of THN.
General Compliance Training	THN's annual general compliance education and training programs.
Code of Conduct	The ACO's standards of business conduct and integrity.



POLICY

It is the policy of THN to comply with all applicable federal, state and local laws and regulations. In addition, it is the policy to have a Code of Conduct that reviewed and approved by the Board of Managers, the President of the Company, and by the Corporate Compliance and Integrity Committee. This policy applies to all employees, members of the Board of Managers (when acting on behalf of the Company), ACO Participants, ACO Providers/Suppliers, and others acting on behalf of THN.

RESPONSIBILITIES

Board of Managers

- Receive and review reports from the Compliance Officer
- Evaluate the effectiveness of the Compliance and Integrity Program
- Review high risk issues of compliance

Compliance Officer

- Is and employee that is not legal counsel; does not have operational accountabilities; and reports to the Board of Managers
- Provide in person, a report to the President on the Compliance and Integrity program at least quarterly
- Provide in person, a report to the Board of Managers on the Compliance and Integrity program at least four times per year
- Operationalizes the compliance and integrity program, including, but not limited to mechanisms for identifying and addressing potential compliance concerns; methods for reporting potential compliance issues, including the capability to report anonymously; and compliance monitoring and auditing.
- Develops written policies and procedures and a Code of Conduct that support THN’s policy to comply with all applicable federal, state, and local laws and regulations.
- Operationalizes the components of the Code of Conduct
- Distribute the applicable policies and procedures and Code of Conduct
- Provide general compliance and fraud, waste and abuse training
- Chair the Corporate Compliance and Integrity Committee, which is responsible for overseeing the Compliance and Integrity Program

Departmental Management

- Will help ensure that employees understand and participate in the Compliance and Integrity program, training and understanding of their responsibilities
- Monitor Compliance and Integrity
- Develop departmental specific policies and procedures that support the function and applicable laws and regulations

REFERENCE DOCUMENTS/LINKS

- United States Sentencing Commission Seven Elements of an Effective Compliance Program
- 42 CFR 423.300

PREVIOUS REVISION/REVIEW DATES

Date	Reviewed	Revised	Notes
N/A	N/A	N/A	This is a new policy.