

Standard Operating Policies – SOP # 3

Corporate Compliance Officer

Title:	Corporate Compliance Officer (CCO)	Effective Date:	10/27/2003
Author:	Chief Compliance Officer	Last Review Date:	12/01/2021
Location:	All Locations	Last Revision Date:	12/01/2021
Functional Area:	ADMINISTRTION		

POLICY

Liberty believes that an effective Corporate Compliance Program (Program) requires a designated corporate Chief Compliance Officer who possesses the specialized training and expertise to serve as the key authority that provides oversight of the corporate-wide Program. Liberty is committed to the operation of an effective compliance program. Therefore, Liberty established the position of Chief Compliance Officer (CCO) to serve as the focal point for compliance activities and be responsible for oversight of the development, implementation and daily operation of the Program.

PROCEDURE

The CCO reports jointly to the Chief Operating Officer and General Counsel. The primary responsibilities of the CCO include:

1. Overseeing and monitoring the Program. The CCO works closely with the Executive Leadership Committee and other pertinent Liberty Workforce members to monitor compliance across all Liberty service delivery sites;
2. Identifying risk areas which require review and monitoring, with timetables and personnel assigned, which will be reviewed on an on-going basis with corporate management;
3. Reporting on the status of the Program on a monthly basis to the Executive Leadership group and on a monthly basis to corporate management . Compliance reports to General Counsel will include information about current and recent compliance issues, plans for investigation, status of previously initiated investigations, timing and adequacy of corrective action plans implemented, and designs for ongoing and future monitoring;
4. Periodically revising the Program and its policies and procedures in light of changes in the needs of the company, and in the rules and requirements of government and private payor health plans;
5. Developing, coordinating, and participating in a multifaceted educational and training program to ensure that Liberty Workforce members are familiar with the Program and committed to compliance with all pertinent federal and state laws and standards;
6. Ensuring that subcontractors and agents who furnish services to Liberty are aware of the applicable requirements of the Program;
7. Coordinating applicant and personnel issues with the Competency Evaluation review work group to ensure that the National Practitioner Data Bank, OIG Cumulative Sanction Report, licensure and certification boards have been checked with respect to all Workforce members as required by SOP 14 .
8. Assisting Liberty financial personnel by coordinating internal compliance review and monitoring activities, including annual or periodic reviews of certain sites that have the potential to become involved in compliance issues;
9. Independently investigating and acting on matters related to compliance, including the design and coordination of internal investigations of problems or suspected violations, and, if necessary, corrective action planning with affected departments, Workforce members The CCO and his/her designee have the authority to review all documents and other information that are relevant to compliance activities;

10. Maintaining an open-door policy and open lines of communication with all Liberty Workforce to facilitate reporting of potential compliance issues, frank discussion, and problem reporting;
11. Monitoring the Employee Help Line to ensure that Liberty Workforce are able to report suspected fraud and other improprieties without fear of retribution, and implementing processes to investigate, resolve and document all Employee Help Line calls;
12. Monitoring activities related to the Program and reporting progress and relevant information to the Executive Leadership group and corporate management, as needed;
13. Responding, in conjunction with legal counsel, to external agency requests regarding compliance issues; and
14. Providing monthly reports to the Executive Leadership and corporate management groups.

NOTE: A detailed description of the range and types of tools that may be used by the CCO to conduct audits, reviews and analyses of the overall Program and/or specific compliance risk areas is provided in Policy "Monitoring Tools: Audits and Risk Assessments."

Approved By: _____

Revision History

Version	Date	Author	Summary of Changes
#1	10/27/2003	Judith Ann Shields	Initial ISF release – refactor and update of previous security policies into distinct documents
#2	08/20/2004	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#3	01/18/2005	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#4	12/22/2006	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#5	12/22/2007	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#6	12/22/2008	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#7	11/15/2009	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#8	8/20/2010	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#9	01/18/2011	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#10	12/22/2012	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#11	12/22/2013	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#12	12/22/2014	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement

#13	11/15/2015	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#14	08/20/2016	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#15	12/22/2017	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#16	12/22/2018	Judith Ann Shields	Annual review, Attorney reviewed added agents, contractors, vendors. Added inactivity lock requirement
#17	11/13/2019	Judith Ann Shields	Annual review, Attorney reviewed coordinating NPDN, etc. in CE. Added inactivity lock requirement
#18	11/03/2020	Judith Ann Shields	Annual review, Attorney reviewed © LHC; Author Title not name,. Added inactivity lock requirement
#19	12/01/2021	John Beck	Annual review, clarification and accuracy edits. Added inactivity lock requirement