



Standard Operating Policies – SOP #1 Compliance Program

Title:	Compliance Program	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:	ADMINISTRATION		

POLICY

Liberty Healthcare Corporation and all of its affiliated companies (collectively “Liberty”) are dedicated to maintaining excellence and integrity in all aspects of its operations and professional and business conduct. Accordingly, Liberty is committed to the application of high ethical standards and compliance with all governing laws and regulations that govern its operations, including both governmental regulations and regulatory agencies’ standards and policies. This commitment is true not only in the delivery of health care but in Liberty’s business affairs and its dealings with its employees, staff, physicians, subcontractors, agents, payors and communities it serves. It is the personal responsibility of all who are associated with Liberty to honor this commitment. The Compliance Program SOPs are applicable to Liberty as defined above as well as all members of the Liberty Workforce (employees and subcontracted workforce).

The Compliance Program is intended to provide reasonable assurance that Liberty:

- Promotes adherence to statutes and regulations relating to its operations and business;
- Satisfies the conditions of participation in health care programs funded by the state and federal government and the terms of its other contractual arrangements;
- Complies in all material respects with all federal, state and local laws and regulations that are applicable to its operations;
- Detects and deters criminal conduct or other forms of misconduct by trustees, officers, employees, staff, agents, contractors and subcontractors that might expose Liberty to significant civil liability;
- Promotes self-auditing and self-policing, and responds promptly to inappropriate circumstances and voluntary disclosure of violations of laws and regulations;
- Establishes, monitors, and enforces high professional and ethical standards; and
- Has made a commitment to prevent, detect, and report all suspected cases of fraud, waste, and abuse across all programs and clients that Liberty serves.

PROCEDURE

1. **The seven essential elements of an effective compliance program:**

According to the U.S. Office of Inspector General (OIG), the seven essential elements of an effective compliance program, are:

- ESTABLISHING A STANDARD MONITORING AND AUDITING PROCESS for evaluating and monitoring compliance related Issues and risks; this includes ensuring that the elements of the program remain effective (e.g., Employee Help Line) and that the areas of risk are monitored consistently and appropriately;
- ESTABLISHING PRACTICE STANDARDS AND PROCEDURES by developing written corporate compliance policies and procedures;
- DESIGNATING A CHIEF COMPLIANCE OFFICER (CCO) to oversee and monitor the corporate compliance program;
- CONDUCTING APPROPRIATE EMPLOYEE EDUCATION AND TRAINING that will include both general

information about the compliance program and specific training related to job functions with the greatest exposure to compliance issues. Every new employee will receive compliance training within thirty (30) days of employment;

- RESPONDING TO DETECTED OFFENSES AND DEVELOPING CORRECTIVE ACTION INITIATIVES, to allow consistent responses to compliance incidents and deficiencies and develop corrective actions;
- DEVELOPING OPEN LINES OF COMMUNICATION in order to prevent problems from occurring and to have frank discussions of why the problem happened in the first place without the fear of retaliation including having mechanisms for reporting suspected compliance incidents;
- ENFORCING DISCIPLINARY STANDARDS that will result in consistent and appropriate disciplinary actions, sanctions, including the possibility of termination, against the offending individual in order to emphasize ethical behavior.

2. **Scope of Liberty's Compliance Program:**

The provisions of the Program apply to all activities performed by Liberty employees and subcontractors. All such personnel are required to act in accordance with the Program as follows:

- Comply with the Liberty Code of Conduct;
- Familiarize themselves with the purpose of the Program;
- Perform their jobs in a manner which demonstrates commitment to compliance with all applicable laws and regulations;
- Report known or suspected compliance issues through the traditional chain of command, to the CCO or his/her designee, or through the Employee Help Line;
- Conduct and/or cooperate and participate in an investigation of any alleged violation and follow through to the point of resolution; and
- Strive to prevent errors and provide suggestions to reduce the likelihood of errors.

3. **Policies corresponding to OIG's compliance program guidelines:**

The CCO oversees the effectiveness of the corporate compliance program, which includes, but is not limited to, the elements recommended by the OIG :

- Code of Conduct Policy.
- Corporate Compliance Officer Policy.
- Education and Training Program Development and Implementation Policy.
- Compliance Communication: Helpline Process Maintenance.
- Investigations: Sanction or Disciplinary Action Enforcement.
- Monitoring Tools Policy.
- Corrective Action Plans and Remediation Policy.

4. **Disciplinary Actions:**

All employees and subcontractors are responsible for complying with the Program, the Code of Conduct and internal policies and procedures, contracts, as well as all applicable laws, rules and regulations. Corrective action for noncompliance will be initiated by the immediate supervisor of the employee(s)/subcontractor(s), who must notify the appropriate Human Resource personnel in accordance with the standard disciplinary policies and procedures of Liberty. Enforcement will be administered by the parties identified by the CCO in consultation with the immediate supervisor and the appropriate Human Resource personnel. Disciplinary actions will be determined on a case-by-case basis and will be issued in a manner that is appropriate, equitable and consistent with the incident.

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. Added inactivity lock requirement
#3	01/18/2005	Judith Ann Shields	Annual review, Attorney reviewed. Added inactivity lock requirement
#4	12/22/2006	Judith Ann Shields	Annual review, Attorney reviewed. Added inactivity lock requirement
#5	12/22/2007	Judith Ann Shields	Annual review, Attorney reviewed. Added inactivity lock requirement
#6	12/22/2008	Judith Ann Shields	Annual review, Attorney reviewed. Added inactivity lock requirement
#7	11/15/2009	Judith Ann Shields	Annual review, Attorney reviewed. Added inactivity lock requirement
#8	8/20/2010	Judith Ann Shields	Annual review, Attorney reviewed. Added inactivity lock requirement
#9	01/18/2011	Judith Ann Shields	Annual review, Attorney reviewed. Added inactivity lock requirement
#10	12/22/2012	Judith Ann Shields	Annual review, Attorney reviewed. Added inactivity lock requirement
#11	12/22/2013	Judith Ann Shields	Annual review, Attorney reviewed. Added inactivity lock requirement
#12	12/22/2014	Judith Ann Shields	Annual review, Attorney reviewed. Added inactivity lock requirement
#13	11/15/2015	Judith Ann Shields	Annual review, Attorney reviewed. Added inactivity lock requirement
#14	08/20/2016	Judith Ann Shields	Annual review, Attorney reviewed. Added inactivity lock requirement
#15	12/22/2017	Judith Ann Shields	Annual review, Attorney reviewed. Added inactivity lock requirement
#16	12/22/2018	Judith Ann Shields	Annual review, Attorney reviewed. Added inactivity lock requirement
#17	12/22/2019	Judith Ann Shields	Annual review, Attorney reviewed. Added inactivity lock requirement
#18	11/03/2020	Judith Ann Shields	Annual review, Attorney reviewed. Added inactivity lock requirement
#19	12/21/2021	John Beck	Annual review, added reference to FWA, deleted duplicate language and errors, made other clarifying edits. Added inactivity lock requirement.

