

Our Lady of Lourdes Health Care Services, Inc. and Affiliates

**POLICY NUMBER:** AS0005CCP

**NURSING CODE:** \_\_\_\_\_

**PAGE NUMBER:** 1

**TITLE:** Corporate Compliance Structure

**ACCOUNTABILITY:**

President and Chief Executive Officer

**OBJECTIVES:**

**RELATION TO MISSION:**

Our Lady of Lourdes, a Catholic Health System – a member of Catholic Health East - dedicated to its Franciscan Tradition of serving all, will demonstrate the value of **Integrity** by fostering an ethical and moral environment where the behavior of associates is positively impacted by the services of the Corporate Compliance Program.

**RELATION TO OPERATION:**

The Corporate Compliance Program provides guidance to all of Our Lady of Lourdes Health Care Services, Inc. and Affiliates (OLLHCS, Inc.) trustees, officers, leadership associates, managers, supervisors, associates, medical staff, house staff, contractors, volunteers, students and others and assists us in carrying out our daily activities within appropriate ethical and legal standards.

**POLICY:**

OLLHCS, Inc. is committed to maintaining an organizational and accountability structure which assures compliance with governmental laws, rules and regulations, and supports OLLHCS, Inc.'s ethical standards, code of conduct and zero tolerance for fraud, abuse and waste.

1) Board of Trustees

The overall accountability for OLLHCS, Inc.'s Corporate Compliance Program rests with the Board of Trustees. The duties of the Board of Trustees relative to compliance efforts are as follows:

- a) To set the standard for OLLHCS, Inc. for corporate compliance through its explicit and implicit adherence to its ethical standards, code of conduct and zero tolerance of fraud, abuse and waste in business and personnel dealings.

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- b) To appoint a multi-disciplinary Corporate Compliance Committee to implement the Corporate Compliance Plan approved by the Board of Trustees.
- c) To appoint a Director of Compliance and Privacy Officer who is responsible for the day-to-day oversight of the Corporate Compliance Program.
- d) To appoint a Corporate Compliance Sub-Committee to assist the Director of Compliance and Privacy Officer with the implementation of and the day-to-day oversight of the Corporate Compliance Program.
- e) To take action on the Corporate Compliance Program (including all Corporate Compliance Policies) and any revisions recommended by the Corporate Compliance Committee to the Board of Trustees.
- f) To receive reports as outlined in the Corporate Compliance Program from the Corporate Compliance Committee and Director of Compliance and Privacy Officer.
- g) To take timely and appropriate actions as warranted and outlined in the Corporate Compliance Program on issues which may arise from daily operations, monitoring activities or external factors.

**2) Composition and Duties of the Corporate Compliance Committee (CCC)**

- a) Composition:
  - i) Board of Trustees members
  - ii) President and Chief Executive Officer Lourdes Health System
  - iii) Senior Vice President of Fiscal Affairs
  - iv) Director of Compliance and Privacy Officer
  - v) Outside Counsel
- b) The duties of the CCC include, but are not limited to the following:
  - i) To review and, if necessary, revise and then recommend to the Board of Trustees for approval the Corporate Compliance Program (including all Corporate Compliance Policies) as presented by the Director of Compliance and Privacy Officer and Sub-Committee;
  - ii) To review and, if necessary, revise the procedures, work programs and protocols developed by the Director of Compliance and Privacy Officer and Sub-Committee which operationalize the Corporate Compliance Program;
  - iii) To review and, if necessary, revise the training methods and materials as developed by the Director of Compliance and Privacy Officer the Sub-Committee;

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- iv) To review the findings of the on-going analyses of OLLHCS, Inc.'s business, industry and legal risks as submitted by the Sub-Committee,
- v) To prepare a report, at least quarterly, to the Board of Trustees which may include a summary of compliance efforts, results of new initiatives, and proposed changes to the compliance programs that would enhance the compliance efforts and annual plans for the program for the up-coming year.

### 3) Composition and Duties of the Sub-Committee

a) Composition:

- i) Members of Lourdes Health System Management Council
- ii) Director of Compliance and Privacy Officer

b) Duties of Sub-Committee:

- i) To develop and then recommend to the CCC for approval the Corporate Compliance Program (including all Corporate Compliance Policies);
- ii) To review and, if necessary, revise the procedures, work programs and protocols developed by the Director of Compliance and Privacy Officer which operationalizes the Corporate Compliance Program;
- iii) To work with the Director of Compliance and Privacy Officer and other associates, as necessary, to develop effective on-going training methods and materials;
- iv) To monitor the on-going analyses of OLLHCS, Inc.'s business, industry and legal risks and assure appropriate steps undertaken to address these risks in a timely manner;
- v) To prepare a report, at least quarterly, to the CCC that will include a summary of compliance efforts, results of new initiatives, and proposed changes to the compliance programs that would enhance the compliance efforts and annual plans for the program for the up-coming year.

### 4) Director of Compliance and Privacy Officer

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The Director of Compliance and Privacy Officer serves as the focal point for compliance activities. The Director of Compliance and Privacy Officer has direct access to the Board of Trustees. The primary duties of the Director include but are not limited to the following:

- a) To develop and monitor the implementation of the Corporate Compliance Program (including all Corporate Compliance Policies);
- b) To develop annual work programs and protocols which address key initiatives to be undertaken based on OLLHCS, Inc.'s policies, perceived areas of risk and governmental focus on compliance issues;
- c) To periodically review and recommend revising the Corporate Compliance Program as necessary, to meet the changing needs of OLLHCS, Inc. in its business and regulatory environment;
- d) To review the coordination of billing, personnel, contracting and other department-specific compliance issues and plans with appropriate leadership associates, managers and supervisors to assure compliance with the Corporate Compliance Program and compliance issues;
- e) To review training and monitoring of new and existing associates with the respective training departments or operating departments to assure that associates receive timely and accurate information
- f) To oversee that internal auditing and monitoring standards meet the needs of the Corporate Compliance Program;
- g) To monitor that significant outside contractors comply with OLLHCS, Inc.'s Code of Conduct;
- h) To monitor compliance with OLLHCS, Inc.'s contracting policies;
- i) To develop methodologies to address any issues which arise from audits and other monitoring measures on a timely basis;
- j) To assure that monitoring activities are conducted in a non-threatening basis; and,
- k) To assure a confidential communications process for the solicitation, evaluation and response to complaints and problems.

5) Senior Management

While the Board of Trustees, Corporate Compliance Committee, Sub-Committee and Director of Compliance and Privacy Officer hold significant roles in assuring OLLHCS, Inc.'s compliance activities, adherence to OLLHCS, Inc.'s Corporate Compliance Program is the responsibility of

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all trustees, officers, leadership associates, managers, supervisors, associates, medical staff, house staff, contractors, volunteers, students and others. Members of Senior Management have specific duties related to compliance including:

- a) To support and maintain on a daily basis OLLHCS, Inc.'s culture as one of compliance to laws and regulations, open communication and zero tolerance of fraud, abuse and waste;
  - b) To work closely with and support the efforts of those with specific responsibility for the oversight and monitoring of the Corporate Compliance Program;
  - c) To support and encourage departments to attend appropriate educational sessions;
  - d) To fairly evaluate leadership associates, managers and supervisors relative to their dealings with associates on Corporate Compliance efforts and to only promote those leadership associates, managers and supervisors who have demonstrated their support in this area; and,
  - e) To participate openly and on a timely basis with requests for information or investigations.
- 6) Because of the nature of the Corporate Compliance efforts, members of the Board of Trustees, Corporate Compliance Committee and designated Senior Leadership, along with the Director of Compliance and Privacy Officer and Sub-Committee sign a confidentiality statement (See Exhibit A) to help assure confidentiality in dealings related to the Corporate Compliance Program and issues.
- 7) Other associates within OLLHCS, Inc., whether or not in a leadership position, are expected to act on a daily basis in a manner which indicates recognition and support of OLLHCS, Inc.'s Corporate Compliance efforts including adherence to the Code of Conduct, overall Corporate Compliance policies and specific departmental or issue-related policies.

**APPROVED BY:** \_\_\_\_\_  
Alexander J. Hatala, President and Chief Executive Officer

**ORIGINAL & REVISION DATE(s):** 03/22/00, 07/24/02, 07/27/05

**NEW EFFECTIVE DATE:** 07/31/08

**REQUIRES REAUTHORIZATION IN:** 07/31/11

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EXHIBIT A

**CORPORATE COMPLIANCE PROGRAM  
CONFIDENTIALITY STATEMENT**

I certify that I have read and understand the Corporate Compliance Structure Policy (OLLHCS, Inc. policy number A0005CCP) and agree to abide by it during the entire term of my employment or appointment as a Trustee. I acknowledge that I have a duty to keep confidential information obtained in dealings related to the Corporate Compliance Program and its issues.

It is the policy of OLLHCS, Inc. that all confidential information pertaining to patients, associates or OLLHCS, Inc. matters be held in strict confidence at all times. The release of such information will only be made with appropriate authorization without exception. Any trustee, officer, leadership associate, manager, supervisor, associate, medical staff, house staff, contractor, volunteer or student who improperly disseminates confidential information will be subject to immediate disciplinary action up to and including discharge. (See OLLHCS, Inc.'s policy "Confidentiality and Privacy" A0059ADM for further details)

Please check the appropriate box:

I certify that this is my first review of this policy following either initial adoption of this policy or my initial employment or appointment as a member of the Board of Trustees.

I certify that this is my annual review of this policy.

\_\_\_\_\_  
Name (Print)

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Position

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