Gundersen Moundview Hospital and Clinics

Subject: Compliance Plan & Standards of Conduct – Maintenance & Distribution

Index Number: GMCo – 3036

Section: 03 – Compliance

Subsection: None

Category: Corporate

Contact: Compliance Officer

Revised Dates: 08/10/18

Last Revised: 5/30/2019

References


Applicable To

This policy applies to Compliance Office employees and other staff of Gundersen Moundview Hospital and Clinics (GMHC), hereinafter “Gundersen Moundview”, involved in the maintenance and distribution of the Compliance Plan and Standards of Conduct booklet.

Detail

Gundersen Moundview is committed to conducting its business ethically and in conformance with its Compliance Plan and Standards of Conduct and all federal and state laws and regulations. To support this commitment, Gundersen Moundview will maintain and update, as appropriate, a written Compliance Plan and Standards of Conduct to provide guidance on employee and organizational responsibilities related to compliance. The Compliance Plan and Standards of Conduct will describe important parts of the Compliance Program, including, but not limited to, the process for reporting compliance concerns, the compliance hotline and the non-retaliation policy. All employees, residents, students and volunteers will be provided with a copy of the Compliance Plan and Standards of Conduct and will participate in an education session that includes a review of the document.

Implementation

General Instructions:

1. The Compliance Plan and Standards of Conduct will:
   a. Be written at a basic reading level, avoiding complex language and legalese.
   b. Address both general and specific areas of potential fraud or similar wrongdoing.
      Provide information on the False Claims Act and other information as required pursuant to the Deficit Reduction Act of 2005.
   c. Reference the non-retaliation policy for the purpose of encouraging communication and the reporting of incidents of suspected fraud or other wrongdoing.
   d. Provide instructions on how to report compliance concerns.
   e. Address acceptance of gifts.
   f. Provide instruction on our Identify Theft Prevention Program.
   g. Be available to employees in both paper and electronic format through Gundersen Moundview’s Hospital and Clinics (GMHC) intranet.
2. The Compliance Officer, or his/her designee, shall review the Compliance Plan and Standards of Conduct on an annual basis to ensure that it accurately represents Gundersen Moundview’s Compliance Program and current state and federal laws and regulations as appropriate. The Compliance Officer, or his/her designee, shall be responsible for oversight and approval of any revisions to the Compliance Plan and Standards of Conduct. The Compliance Operations Committee shall review and approve the Compliance Plan and Standards of Conduct at least annually.

3. The Compliance Officer, or his/her designee, will ensure that all employees have access to the Compliance Plan and Standards of Conduct, as well as any updates to the document.

4. Education related to the contents of the Compliance Plan and Standards of Conduct is conducted as described in the Compliance Plan and Standards of Conduct Education policy (GMCo-3006).

Revised by:
Compliance Officer

Federal / State or Other Regulatory Standards

Other Policies/Standards
Compliance Plan & Standards of Conduct, Maintenance & Distribution, GL-3036

Links to Gundersen Moundview Forms