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

Index Number: GPLHCCO-3036

Section: Compliance

Subsection: General

Category: Corporate

Contact: J. Peter Weidenheim

Last Revised: 11/21/2018

Reviewed: 07/26/2019

References


Applicable To

All Compliance Office employees and other staff involved in the maintenance and distribution of the Compliance Plan and Standards of Conduct booklet of Palmer Lutheran Health Center, Inc. a Gundersen Health System affiliate and hereafter referred to as “GPLHC”.

Detail

GPLHC 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, GPLHC 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, medical and associate staff, residents, students, and volunteers shall receive education and will be provided with a copy of the Compliance Plan and Standards of Conduct during an education session that includes a review of the document. New employees as part of their orientation will receive the Compliance Plan and Standards of Conduct during an education session at that time. Existing employees will review it on an annual basis during their annual training. The document will be included in this training or it will be accessible on the intranet. The Compliance Plan and Standards of Conduct is available on the GPLHC website for vendors and others.

Implementation
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;
   c. Provide information on the False Claims Act and other information as required pursuant to the Deficit Reduction Act of 2005;
   d. Reference the non-retaliation policy for the purpose of encouraging communication and the reporting of incidents of suspected fraud or other wrongdoing;
   e. Provide instructions on how to report compliance concerns;
   f. Address acceptance of gifts;
   g. Provide instruction on our Identify Theft Prevention Program; and
   h. Be available to employees in both paper and electronic format through Gundersen Health System’s intranet.

2. The Director of Compliance/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 GPLHC’s Compliance Program and current state and federal laws and regulations as appropriate. The GPLHC Compliance Operations Committee shall be responsible for oversight and final approval of any revisions to the Compliance Plan and Standards of Conduct.

3. The Director of Compliance/Compliance Officer, or his/her designee, will ensure that all employees or other covered individuals 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 (GPLHC-3006).

Approved by GPLHC’s Compliance Operations Committee: November 10, 2015