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

Index Number: HARCO-3036

Section: Compliance and Ethics

Subsection: General

Category: Corporate

Contact: Administrator

Last Revised: 3/17/19

References:

Office of the Inspector General Program Guidance for Hospitals;
Gundersen Health System, Statement of Governance Principle, adopted November 24,
2014

Applicable To:

This policy applies to all employees of Gundersen Harmony Care Center involved in the education, maintenance and distribution of the Compliance Plan and Standards of Conduct booklet.

Detail:

Gundersen Harmony Care Center 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 Harmony Care Center 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

1. The Compliance Plan and Standards of Conduct will:
 - Be written at a basic reading level, avoiding complex language and legalese;
 - 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;
 - Reference the non-retaliation policy for the purpose of encouraging communication and the reporting of incidents of suspected fraud or other wrongdoing;

- Provide instructions on how to report compliance concerns;
 - Address acceptance of gifts;
2. The Administrator/Chief 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 Harmony Care Center's Compliance Program and current state and federal laws and regulations as appropriate. The Administrator/Chief Compliance Officer, or his/her designee, will report to the Compliance Oversight Committee, and recommendations for updating or improving the contents of the Compliance Plan and Standards of Conduct. The Compliance Oversight Committee shall be responsible for oversight and final approval of any revisions to the Compliance Plan and Standards of Conduct.
 3. The Chief 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 will be upon hire for all new employees and annually thereafter as follows:
 - Between January 1 and December 31 each year, all employees will take specific computer courses from the on-line education service "EduCare".
 - a) Medicare – Fraud, Waste and Abuse- v 1.2
 - b) SNF - Orientation – v. 2.1
 - c) SNF – Quality Assurance and Compliance – v. 1.1
 - d) Silver – HIPAA – v. 3.1
 - A record of attendance will be maintained on each employee to ensure completion of Compliance Plan and Standards of Conduct annual education requirements.
 5. Education related to contents of the Compliance Plan and Standards of Conduct will be provided to all new board members and volunteers and annually thereafter via face to face meeting with Compliance Officer.

End of Document

