
Subject	Compliance Plan and Standards of Conduct, Maintenance and Distribution
Index Number	GL-3036
Section	Compliance and Ethics
Subsection	General
Category	Corporate
Contact	Adank, Kari B
Last Revised	3/6/2015

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 Compliance Office employees and other staff of Gundersen involved in the maintenance and distribution of the Compliance Plan and Standards of Conduct booklet. As used herein, "Gundersen" refers to Gundersen Lutheran Health System, Inc. its principal affiliates, Gundersen Clinic, Ltd, and Gundersen Lutheran Medical Center, Inc.

Detail

Gundersen 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 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:
 - 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's intranet.
2. The Compliance Oversight Committee shall review the Compliance Plan and Standards of Conduct on an annual basis to ensure that it accurately represents Gundersen's Compliance

Program and current state and federal laws and regulations as appropriate. 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 is conducted as described in the Compliance Plan and Standards of Conduct Education policy (GL-3006).