

Gundersen Harmony Care Center
Subject: Maintenance and Distribution of
Compliance plan/standards of conduct
Policy Type: Corporate
Section: Compliance and Ethics
Contact: Administrator

Policy and Procedure Manual
Policy Number: HCHC 3036
Original Policy Date: 3/7/12
Last Revised:
Next Review:

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.

Policy:

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/ 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/ Compliance Officer, or his/her designee, will report to the Compliance Committee any recommendations for updating or improving the contents of the Compliance Plan and Standards of Conduct. The Compliance Committee shall be responsible for oversight and final approval of any revisions to the Compliance Plan and Standards of Conduct.

3. The Administrator/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 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
 - e. Attend a staff meeting each year that includes an education component for Gundersen Harmony Care Center’s Compliance Plan and Standards of Conduct.
 - For new employees, they shall be educated on the Gundersen Harmony Care Center Compliance Plan and Standards of Conduct at the time of their orientation.

A record of attendance will be maintained on each employee to ensure completion of Compliance Plan and Standards of Conduct annual education requirements.

End of Document