

	Strong Home Care Group, Inc.	Corporate Compliance
	POLICY: Corporate Compliance Program	Policy #105A
	SECTION: 100A	
	Created: 9/1/98	Reviewed: 12/9/04 Revised:
	Approved by: Quality & Compliance Committee Date: 12/14/06	Reg: COP:

Policy: It is the responsibility of all staff, agents and contractors to understand and adhere to all aspects of the compliance program.

Description:

The Organization is committed to a high level of honesty and ethical behavior in all aspects of its delivery of services to, and relationships with, patients, physicians, third-party payers, employees, agents and independent contractors. The Corporate Compliance Program, authorized by the Board of Directors, has been developed to prevent and detect any violations of the law (including but not limited to health care fraud and abuse activities) and to take appropriate action as required. The Corporate Compliance program applies to all programs of the Visiting Nurse Service including Visiting Nurse Hospice. The Office of the Inspector General’s OIG Compliance Program Guidelines for Home Health Agencies and for Hospices have been reviewed and serve as the basis for the VNS Corporate Compliance Program.

The Corporate Compliance Program will:

1. Provide simple, explicit compliance guidelines for all employees to follow.
2. Ensure that all employees understand what is expected of them in the conduct of their business.
3. Ensure that employees are utilizing the Standards of Conduct in their daily practice.
4. Ensure that our business partners understand and adhere to our compliance program in their relationships with us.
5. Enhance corporate performance in basic business relationships.
6. Ensure that the organizational culture supports ethical and honorable conduct at all times.
7. Build trust in the community.
8. Provide a process for decision making when the business standards do not provide a clear answer to a dilemma.
9. Ensure that the organizational culture supports decision making based on the clinical needs of the patient, balanced with fiscal responsibility.

This will be accomplished by:

1. A published Policy Statement and Standards of Conduct.
2. Participation of Management in all aspects of compliance.
3. Reinforcement through internal communication.
4. Corporate Compliance training of all staff.
5. Sources of information, including a confidential phone line for reporting of any potential breach of the Compliance Policy. (Dial 800 then ext: 8269)
6. Monitoring and enforcement through the Director of Compliance and the Professional Advisory Committee.
7. Reporting of VNS compliance to the President, the VNS Board, Management and Staff.
8. Review and update of the Corporate Compliance Plan at least annually, and more often if deemed necessary through the identification of new concerns.