

## Policy

- A. It is the policy of the ACO to ensure that the regulations and standards for the Medicare Shared Savings Program and all applicable Medicare regulations, as well as other federal and state laws and regulations, are met.

## Applicability

This policy and procedure applies to all Participants, Providers/Suppliers, and other individuals or entities performing functions or services related to the ACO's activities.

## Procedure

- A. The ACO has developed a Compliance Plan document which outlines the elements of the ACO's Compliance activities, and is designed to promote a culture within the ACO of integrity, ethical behavior, and compliance with applicable laws and regulations.
  1. The Compliance Plan is drafted and updated by Compliance then reviewed and approved by the ACO's Governing Body.
  2. The Compliance plan is reviewed and updated at least annually, and as needed, to meet the most updated legal and regulatory requirements.
- B. As part of the Compliance Plan, the ACO has established the following:
  1. A designated Compliance Officer or individual who is not legal counsel to the ACO and reports directly to the ACO's Governing Body;
  2. Mechanisms for identifying and addressing compliance problems related to the ACO's operations and performance;
  3. A dedicated Compliance Hotline number for employees or contractors of the ACO, ACO Participants, Providers/Suppliers, and other individuals or entities performing functions or services related to ACO activities to anonymously report suspected problems related to the ACO to the Compliance Officer;
  4. An effective training program for the ACO, Participants, and Providers/Suppliers to be performed during ACO orientation upon hire, at least annually and when changes in applicable laws and regulations warrant dissemination of updated information and training, including training on the Compliance Program, the Health Insurance Portability and Accountability Act (HIPAA), and fraud, waste and abuse (FWA); and,
  5. A requirement for the ACO to report probable violations of law to an appropriate law enforcement agency and the mechanisms to do so.

## Reporting

- A. N/A

## Related Documentation

- A. 42 CFR § 425.300(a)
- B. ACO Terms & Definitions Policy
- C. Code of Conduct
- D. Code of Conduct Policy
- E. Compliance Hotline Policy
- F. Compliance Plan
- G. Compliance Program
- H. Designation of a Compliance Officer & Subcommittee Policy
- I. Reporting Probable Violations of Law Policy
- J. Training & Knowledge Updates Policy