

LEE MEMORIAL HEALTH SYSTEM BOARD OF DIRECTORS

POLICY MANUAL

no. 10.47A

supersedes no. 10.47

category: General Operations
title: **Compliance Program**

date adopted: 09/27/02 review date: 11/8/07
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PURPOSE:

To establish and define the general scope of a Compliance Program for Lee Memorial Health System (LMHS).

POLICY:

LMHS is dedicated to being legally and ethically correct in all of its actions. Therefore, it is LMHS policy that all employees, agents, medical staff, volunteers, and individuals doing business with or performing functions or services at LMHS comply with Federal and State statutes and regulations and provisions of private health care programs. LMHS voluntarily established a Compliance Program to assist in maintaining an ethical climate and provide a mechanism to prevent, detect, and correct compliance violations. The program is intended to complement, not replace, other LMHS policies.

The Board has overall oversight responsibility for the Compliance Program and activities. The System President and the Board appoint a Chief Compliance Officer, who is responsible for implementing the LMHS Compliance Program.

The Chief Compliance Officer reports directly to the System President and to the Board. The System President is responsible for providing executive oversight and authority for allocating appropriate resources to effectively implement the Compliance Program. The Board designates a Liaison to receive periodic updates from the Chief Compliance Officer. Apparent violations estimated to have a material effect on the financial status of the System, involve serious criminal matters or serious contract violations, or appear likely to result in adverse news media coverage are to be reported immediately to the System President and the Board. If situations occur where the System President is involved in unethical matters, the Chief Compliance Officer will report the matters directly to the Board. The System President will not prevent the Chief Compliance Officer from reporting serious violations to the Board.

The Compliance Program is based on guidelines issued by the Department of Health and Human Services, Office of Inspector General. The Chief Compliance Officer provides the Board with quarterly updates summarizing Compliance activities and strives to ensure that all covered by this policy are kept informed of the Standards of Conduct and the Compliance Program.