

SHORE HEALTH SERVICES, INC. - ADMINISTRATIVE/COMPLIANCE PLAN

COMPLIANCE DOCUMENTATION

✓ Shore Memorial Hospital ✓ Shore Rehab ✓ Shore Life Care ✓ Shore Health Care at Home ✓ MMC ✓ Lingle/Goldstein Surgical Assoc. ✓ Orthopedic Assoc.

Written: 2/99 Revised: 5/00, 5/O1 ,11/2004

Adopted by the Board: 4/28/99 Board Reviewed: 5/31/00, 6/27/O1 , 3/30/2005

Chairman of Board

President / CEO

Compliance Officer

Purpose: Provide guidelines for maintaining documentation to allow Shore Health Services, [Inc to](#) determine and evidence the effectiveness of the Hospital's Corporate Compliance Plan.

Policies and procedures regarding the documentation of patient medical records are contained in the HIS policy and procedure manual and the Billing and Claims Manual.

Policy: Documents generated pursuant to the Compliance Plan, including meeting minutes, investigatory documents, review reports and supporting documentation, authoritative documentation, corrective action plans, and educational materials, shall be maintained by the Compliance Officer.

All records developed in accordance with the operation of the Compliance Plan shall be maintained for a minimum of six (6) years; provided, however, that if there is any ongoing internal or external investigation, including cost report reviews, OIG investigations, lawsuits, or similar actions, then those records relevant to the action shall be retained until the action is concluded. .

In order to protect the integrity of the Hospital's Corporate Compliance Plan and to confirm the effectiveness of the program, the Organization will undertake the following documentation efforts:

- Document the development and revisions of written standards of conduct, policies and procedures that demonstrate commitment to compliance plan. Document all revisions of, or modifications to, the Corporate Compliance Plan and retain all written notifications regarding such changes. Document provision of policies to individual's affected

- **by a particular policy including agents and independent contractors**
- Document that current employees and newly hired employees have been familiarized with the Corporate Compliance Plan and related policies and have received a copy of the Code of Conduct. This will be documented using the Code of Conduct and Certification Form. **Human Resources shall maintain the form in the employees personnel form. Rosters and associated forms will be stored in the DocStar electronic storage system.**
- **As an element of performance evaluate managers and employees for adherence to compliance.**
- Document all inquiries, reports **and allegations of improper / illegal activities received through** the telephone reporting and information lines; See Reporting Policy; **Document investigation and remediation of identified systemic problems.**
- **Document enforcement of appropriate disciplinary actions for violations of compliance policies, applicable statues, regulations of Federal Health care Program Requirements.**
- Document all compliance Education; See Education Policy;
- Document all results of other monitoring techniques and investigation results. See Monitoring and Investigation Policy;
- Document all inquiries made to government agencies or other entities when advice is sought regarding compliance (i.e. billing questions posed to the Medicare Intermediary). See Billing Office Policy.
- Document any self reporting to government agencies.
- Document ongoing evaluation of the effectiveness of the Corporate Compliance Plan through the periodic reports of the Compliance Officer to the Board of Directors.

References

- Snell,Roy ;Saunders,Brent;Murphy ,Joseph and Ryan,Elizabeth. The Health Care Compliance Professional's Manual HCCA Publication // Aspen Publication. June 2004
- OIG Model Compliance Program Guidance Clinical Laboratories; 62FR 9435-9440
- OIG Model Compliance Program Guidance for Hospitals; 63 FR 8987-8998
- OIG Compliance Program Guidance for Home Health Agencies 63 FR – 42410 – 42426
- OIG Compliance Program for Nursing Facilities; 65 FR 14289 – 14306
- Final Compliance Program Guidance for Individual and Small Group Physician Practices ; 65 FR 59434 – 59452
- OIG Draft Supplemental Compliance Program Guidance for Hospitals; 69FR, 32012-32031
- Healthcare Compliance Portfolio, CCH, 2004