



**POLICY TITLE:** Audit and Compliance Policies and Procedures

**Responsible Department:** Audit and Compliance

**Creation Date:** 12/05

**Review Date:** 02/12, 01/20

**Revision Date:** 01/17, 01/18

**SUBMITTED BY (AUTHOR):** Beth Gillis

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**APPROVED BY:** Wendy Kemp

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**APPROVED BY:** Karen Brady

**Title:** Corporate Vice President and Chief Compliance Officer

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**SUMMARY & PURPOSE:**

To describe the purpose of the department's policies and procedures as well as defining their availability and the frequency of review and update.

**POLICY:**

The Audit and Compliance Department will develop, maintain and make available to all employees, medical staff members, Board members and vendors, policies and procedures related to the Corporate Compliance Program and the department's role in administering the Program.

**SCOPE/APPLICABILITY:**

Audit and Compliance Department.

**PROCEDURES TO ENSURE COMPLIANCE:**

The Audit and Compliance Department will develop policies and procedures related to the Corporate Compliance Program and the department's role in administering the Program.

The policies and procedures will be made available to all employees via the organization's intranet.

Paper copies of the policies and procedures will be provided upon request to employees who may not have access to the intranet.

The policies and procedures will be made available to the public, including vendors without access to the intranet, via the organization's internet website.

Existing policies and procedures must be reviewed annually and updated as needed.

Should changes in regulations or laws impact existing policies and procedures, the update must be initiated as soon as the changed regulation or law is identified.

Policies and procedures specific to functions of operational departments and the department's compliance with specific laws, rules and regulations governing federally funded health care programs are the responsibility of the operational department impacted by such laws, rules and regulations.

Audit and Compliance Department policies and procedures must be approved by the Corporate Vice President and Chief Compliance Officer.

**SUPPORTING/REFERENCE DOCUMENTATION:**

- United States Federal Sentencing Guidelines
- Office of the Inspector General Compliance Program Guidance for Hospitals
- Office of the Inspector General Supplemental Compliance Program Guidance for Hospitals
- International Standards for the Professional Practice of Internal Auditing (Standards)

**RELATED POLICIES, PROCEDURES, AND ASSOCIATED FORMS:**

BHSF Administrative Policy: 801 Department Responsibilities and Charter Policy – Audit and Compliance

**ENFORCEMENT & SANCTIONS:**

Enforcement of this policy is the responsibility of the Audit and Compliance Department.