



POLICY TITLE: Communicating Corporate Compliance Program Standards

Responsible Department: Audit and Compliance

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SUMMARY & PURPOSE:

To describe the methods that will be used to communicate the standards of the Corporate Compliance Program to employees, physicians and vendors.

POLICY:

Communication of the standards of the Corporate Compliance Program is vital in order to promote awareness to all employees, physicians and vendors of the ethical standards adopted by Baptist Health South Florida. In order to facilitate awareness, Compliance Program Standards will be communicated through various communication methods.

SCOPE/APPLICABILITY:

Audit and Compliance Department, HR Talent Management & Development and management throughout the organization.

PROCEDURES TO ENSURE COMPLIANCE:

All new employees will receive orientation on the Corporate Compliance Program during the mandatory new employee orientation.

All current employees will complete annual required training on the Corporate Compliance Program.

The Code of Ethics will be distributed periodically to all employees, staff physicians, Board members and vendors.

All non-management employees will acknowledge their responsibility to report suspected violations of the Code of Ethics during their annual performance review.

The Code of Ethics will be offered at all education programs presented by the Audit and Compliance Department.

All references to Policies must go to the BHSF Master Copy on the BHSF Intranet; do not rely on other versions / copies of the Policy.

The Audit and Compliance Department will maintain a departmental website on the organization's intranet and a Corporate Compliance page on the organization's internet. The Code of Ethics will be posted on both these sites.

Audit and Compliance policies and procedures will be available on both the organization's intranet and internet.

Operational departments are encouraged to discuss the standards of the Corporate Compliance Program at departmental staff meetings.

Alternate methods of communicating Compliance Program Standards will be utilized upon the approval of 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 Inspector General Supplemental Compliance Program Guidance for Hospitals

RELATED POLICIES, PROCEDURES, AND ASSOCIATED FORMS:

- BHSF Administrative Policy: 819 Code of Ethics – Audit and Compliance
- BHSF Administrative Policy: 825 Compliance Training – Audit and Compliance
- SMH Administrative Policy: 819 Code of Ethics
- SMH Administrative Policy: 825 Compliance Training

ENFORCEMENT & SANCTIONS:

Audit and Compliance will provide training materials and in conjunction with HR Talent Management & Development will provide training sessions. Management throughout the organization is responsible for ensuring that all employees complete their training requirements. Official records of training will be maintained by HR Talent Management & Development.