



POLICY TITLE: South Miami Hospital Compliance Committee

Responsible Department: Audit and Compliance

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SUMMARY & PURPOSE:

To delineate the activities and responsibilities of the South Miami Hospital Compliance Committee.

POLICY:

The South Miami Hospital Compliance Committee (the Committee) shall support the Hospital Compliance Officer (HCO) in fulfilling the responsibilities of the hospital's Corporate Integrity Agreement (CIA). The Committee shall assist in the analysis of South Miami Hospital's risk areas and shall oversee monitoring of internal and external audits and investigations.

SCOPE/APPLICABILITY:

This policy applies to South Miami Hospital.

PROCEDURES TO ENSURE COMPLIANCE:

1. The Hospital Compliance Officer will be the chair person of the Committee.
2. The Committee will include members of senior management necessary to meet the requirements of the SMH Corporate Integrity Agreement. Relevant departments and/or representatives include, but are not limited to:
 - a. Clinical services
 - b. Chief Medical Officer
 - c. Human Resources
 - d. Revenue Management, i.e. billing
 - e. Audit & Compliance
 - f. Operational departments, such as performance improvement, utilization review and medical staff office.
3. The Committee will meet at least quarterly and will maintain minutes of such meetings. The minutes of the meetings shall be made available to the Office of the Inspector General upon request.

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.

4. The responsibilities of the South Miami Hospital Compliance Committee include:
 - a. Support the Hospital Compliance Officer in fulfilling his/her responsibilities related to implementation of and compliance with the requirements of the CIA.
 - b. Periodically assess whether the implemented elements of the CIA are effective and meet Federal health care program requirements and the obligations of the CIA.
 - c. Periodically assess whether the Hospital Compliance Program contains all the elements of an effective compliance program and that those elements are effective in preventing, detecting and remediating Compliance Program violations.
 - d. Assist the HCO in identifying and analyzing South Miami Hospital's risk areas and in developing strategies and approaches to mitigate the identified risks.
 - e. Oversee monitoring of internal and external audits and investigations.
 - f. Work to promote the Hospital Compliance Program within their business units.
 - g. Provide specialized expertise regarding compliance or operational subject areas.
5. The Committee members will refer any allegation of conduct that violates the Code of Ethics immediately to the Hospital Compliance Officer or his/her designee. Such allegations received by Committee members must be held in the strictest confidence.
6. The Committee members must abide by all the policies and procedures of the Hospital Compliance Program, particularly in regard to allegations of misconduct, investigations of misconduct, non-retaliation for reporting concerns, and confidentiality.
7. SMH shall report to the Office of Inspector General, in writing, any actions or changes that would affect the Hospital Compliance committee's ability to perform the duties necessary to meet the obligations in this CIA, within 15 days after such a change.

SUPPORTING/REFERENCE DOCUMENTATION:

- Department of Health and Human Services, Office of Inspector General, Compliance Program Guidance for Hospitals
- United States Federal Sentencing Guidelines
- Corporate Integrity Agreement between the Office of the Inspector General of the Department of Health and Human Services and South Miami Hospital, Inc.

RELATED POLICIES, PROCEDURES, AND ASSOCIATED FORMS:

- BHSF Administrative Policy: 807 Compliance Audits and Investigations – Audit and Compliance
- BHSF Administrative Policy: 819 Code of Ethics – Audit and Compliance
- BHSF Administrative Policy: 822 Non-Retaliation for Reporting Potential or Actual Violations of the Code of Ethics – Audit and Compliance
- SMH Administrative Policy: 819 Code of Ethics
- SMH Administrative Policy: 822 Non-retaliation for reporting Potential or Actual Violations of the Code of Ethics

ENFORCEMENT & SANCTIONS:

Enforcement of this policy is the responsibility of South Miami Hospital senior management. Failure to comply with compliance program policies and procedures can lead to disciplinary action up to and including termination of employment.