



POLICY TITLE: Duties of the Hospital Compliance Officer

Responsible Department: Audit and Compliance

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SUMMARY & PURPOSE:

To delineate the authority, duties and responsibilities of the Hospital Compliance Officer

POLICY:

The Hospital Compliance Officer is a full-time position. The Hospital Compliance Officer devotes his/her full professional time to carrying out the duties and responsibilities of the Hospital Compliance Officer as a member of the Audit and Compliance Department.

At the direction of and under the supervision of the Vice President and Chief Compliance Officer, the Hospital Compliance Officer coordinates compliance at South Miami Hospital in accordance with Compliance Program standards and procedures, and the procedures described below.

SCOPE/APPLICABILITY:

This policy applies to the Hospital Compliance Officer.

PROCEDURES TO ENSURE COMPLIANCE:

The Hospital Compliance Officer is appointed by and reports to the Baptist Health South Florida Corporate Vice President and Chief Compliance Officer.

Responsibilities of the Hospital Compliance Officer include:

1. Develop and implement policies and procedures regarding the operation of the hospital compliance program. Such policies and procedures must meet the requirements of an effective compliance program as defined by the Office of the Inspector General. Review and update at least annually.
2. Develop and implement policies, procedures, and practices designed to ensure compliance with Federal health care program requirements.

3. Make quarterly reports regarding compliance matters directly to the Board of Directors of South Miami Hospital and maintain written documentation of those reports.
4. Monitor day-to-day compliance activities engaged in by South Miami Hospital.
5. Fulfill government reporting obligations related to the compliance program of South Miami Hospital.
6. Establish a Hospital Compliance Committee which meets quarterly and maintain documentation of those meetings.
7. Meet at least quarterly with the South Miami Hospital Board of Directors to report information regarding the Hospital Compliance Program and to assist the Board with their reporting requirements.
8. Provide information and documentation needed to complete the review of the compliance program's effectiveness conducted on behalf of the Board by an independent third party.
9. Establish a process to obtain annual compliance certification from executives of South Miami Hospital.
10. Interact in a collaborative and professional manner with employees, physicians and Board members at SMH.
11. Develop a recognized presence as Hospital Compliance Officer at SMH.
12. Participate in steering committees and task forces at SMH.
13. Work in collaboration with the Chief Compliance Officer and the BHSF Compliance Program.

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)
- South Miami Hospital Corporate Integrity Agreement

RELATED POLICIES, PROCEDURES, AND ASSOCIATED FORMS:

- BHSF Administrative Policy: 801 Department Responsibilities and Charter Policy – Audit and Compliance
- BHSF Administrative Policy: 819 Code of Ethics – Audit and Compliance
- SMH Administrative Policy: 819 Code of Ethics

ENFORCEMENT & SANCTIONS:

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