



## CORPORATE COMPLIANCE PLAN

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## I. OVERVIEW OF CORPORATE COMPLIANCE PLAN

Our corporate compliance plan reflects the commitment of Baptist Homes Society to comply with the laws and regulations that apply to our business, and to promote the highest standards of ethics in the conduct of that business.

Our corporate compliance plan includes, but is not limited to, the requirements of the Centers for Medicare and Medicaid Services (CMS), the Pennsylvania Department of Health, the Pennsylvania Department of Public Welfare, the Department of Housing and Urban Development (HUD), the Health Insurance Portability and Accountability Act of 1996 (HIPAA), the Patient Protection and Affordable Care Act of 2010 and the Elder Justice Act. It also addresses our organization's Code of Ethics, which is established by our Society Board of Directors.

We hold all organization staff, Board, physicians, contractors, and vendors responsible for conducting themselves in accord with the standards of our compliance plan, and require anyone who has concerns or questions regarding ethical or compliance issues to immediately contact the Corporate Compliance Officer in person or via the compliance hotline at 412-572-8360. Baptist Homes Society makes every effort to maintain, within the limits of the law, the confidentiality of the identity of any individual who reports possible misconduct, and will not tolerate any form of retaliation, retribution, sanctions, or discipline for anyone who enters a good faith report of a possible violation.

Conduct in violation of the standards of our corporate compliance plan will result in consequences up to and including termination of the employment or business relationship.

### A. Our Vision, Mission, and Value Statements

#### **Vision:**

We will be the premier organization in Western Pennsylvania that delivers the highest quality of senior living in an independent or supportive environment, while always uplifting one person at a time.

#### **Mission:**

Building on our 100-year tradition of excellence, we offer a full continuum of enriched living, compassionate care, and benevolence to a broad spectrum of individuals. We promote a lifestyle of growth, creativity and independence, while respecting the dignity and self determination of those living and working in our Christian communities.

#### **Value Statements:**

*Expression of Faith:* Our mission arises out of our Christian faith and our Baptist heritage. We are called to express Christian love for all with whom we come into contact, to be a witness to the love of God through the way we care for others, to be a responsible member of our community, and to be a good steward of all the resources which have been entrusted to us.

*Fiscal Responsibility and Benevolence:* We fulfill our mission by combining sound fiscal management with the highest quality of services. We also fulfill our charitable responsibility by offering as many of our services to those in financial need as is consistent with prudent stewardship.

*Growth:* We believe in growth which responds to current needs, anticipates the challenges of the future, and enhances the basic values and character of our ministry.

*People:* Every person who is a part of our family, including residents, employees, families, volunteers, and visitors, is to be treated in a loving, respectful manner consistent with our Christian teachings about the special value of each individual. We strive to foster self-esteem and integrity among all members of our family.

*Ethical Standards:* Our high regard for Christian ethical behavior is to be reflected throughout the organization, including relationships with residents, their families, employees, constituent churches, communities, and those with whom we do business.

*Leadership:* We are called to excellence in our service. We embrace our heritage and will approach the future with faith, vision and creativity.

*Wellness:* We affirm the right of all individuals in our communities to achieve their highest level of well-being in mind, body and spirit. We are committed to providing the environment that encourages and supports the components of wellness: physical, emotional, spiritual, social, intellectual, and community.

## **B. Code of Ethics**

Our organization's Code of Ethics emphasizes the fundamental standards expected of our staff members and business partners, which are outlined in greater detail throughout this compliance plan:

- *Treat Residents and Each Other with Respect, Dignity and Courtesy.*
- *Provide Quality Care and Services.*
- *Report Suspected Misconduct.*
- *Maintain Confidentiality.*
- *Avoid Conflicts of Interest.*
- *Observe Ethical Business Practice.*
- *Maintain Appropriate Relationships with Residents.*
- *Safeguard Funds and Resources.*

## **II. BAPTIST HOMES SOCIETY CORPORATE COMPLIANCE PLAN**

### **A. Oversight**

The Baptist Homes Society Board of Directors and the President & CEO oversee the implementation of the corporate compliance program, and make reasonable efforts to assure that appropriate financial and human resources are available to support the program on an ongoing basis.

The Baptist Homes Society Risk Management Committee implements written compliance-related policies and procedures, and conducts periodic reviews of compliance related issues. Detailed compliance related policies are 103, 114, and 118 of the organization's Corporate Policy and Procedure Manual. The Risk Management Committee is comprised of, but not limited to, individuals in the following positions: Executive Director (of all communities), Compliance Officer, Chief Financial Officer, Director of Human Resources, Director of Public Relations, Board member; Directors of Resident Services, Nursing, Independent Living, and Personal Care (of all communities), and insurance broker representatives. The President & CEO participates in the committee as needed. The Risk Management Committee meets quarterly.

Through its Quality Improvement process, the organization conducts monthly audits which are reviewed quarterly. Specific key indicators, which reflect a number of these audits, are reported to the Board of Directors quarterly.

The Corporate Compliance Officer monitors the compliance hotline, and investigates and addresses compliance-related concerns and questions. The Compliance Officer can be reached via the Compliance Hotline at (412) 572-8360.

## **B. General Compliance Standards**

Baptist Homes Society is committed to complying with **all** applicable laws and regulations. The following general compliance standards are not an exhaustive list, but serve as a guideline for our operations, and identify the types of conduct that the compliance program is designed to prevent. Both the Risk Management Committee and the Corporate Compliance Officer are prepared to provide individuals with assistance in meeting the standards of our corporate compliance plan.

### **1. Admission and Provision of Services**

#### ***Admission, Transfer, and Discharge Practices***

Baptist Homes Society makes no distinction in the admission, transfer, discharge, or care of residents based on race, religion, color, sex, or national origin. Clinical care is based on identified resident health care needs, not on payment source or organization economics.

#### ***Resident Freedom of Choice***

Baptist Homes Society respects a resident's freedom to choose the healthcare provider of his/her choice. According to Medicare law, an individual who is entitled to benefits may obtain healthcare services from any institution, agency, or person which is qualified to participate in the Medicare program, and which chooses to provide the services. Examples include, but are not limited to, hospitals, hospice services, and attending physicians.

#### ***Resident Rights***

Baptist Homes Society provides each resident a written statement of resident rights, facility charges, and as applicable, a clear explanation of care. All residents are treated in a manner that preserves their dignity, autonomy, self-esteem, civil rights, and involvement in their own care. Residents may select advance directives, including living wills and durable powers of attorney, which are honored to the extent permitted by law and within the capabilities of Baptist Homes Society.

#### ***Quality Care and Services***

Baptist Homes Society employs or contracts only with those persons who have proper credentials and experience, conform to the standards of their respective professions, and exercise sound judgment in the performance of their duties.

### **2. Confidentiality**

A resident's medical, financial, or other personal information is not disclosed to anyone except as permitted by law, or with the resident's permission. Electronic transmission of claims for payment, assessment information, and other data are completed in accordance with all applicable legal guidelines.

Staff members have an obligation to maintain the confidentiality of salary, benefit, and other personal information related to staff members, and to prevent the release of this information beyond those individuals who may need it to fulfill their job responsibilities. We maintain personnel files,

payroll information, disciplinary matters, and other personal information in a manner designed to ensure confidentiality.

Information concerning Baptist Homes Society business dealings and practices, business records, trade secrets, strategic initiatives, etc. is proprietary information and is not shared with others outside the organization, except as required by law or the terms of a consulting or other business relationship approved by the President & CEO.

### **3. Conflicts of Interest**

A conflict of interest generally exists when a staff or Board member's personal interests or activities could influence judgment in the performance of duties for Baptist Homes Society. Staff and Board members may not use their positions to profit personally, or to assist others in profiting, at the expense of the organization.

### **4. Business Practices**

Business transactions between Baptist Homes Society and its vendors, contractors, or other third parties are conducted in a fair and impartial manner. Staff and Board members accurately represent the organization, and do not engage in any activity or scheme intended to defraud anyone of money, property, or services.

*Tips and Gifts:* No Baptist Homes Society staff member may request or accept tips or gifts from residents, families, visitors, or vendors. Gifts that can be shared with others, such as food, may be accepted if they are made available for other staff members to enjoy. Acceptance of meals, or other entertainment for the purpose of meeting to discuss business matters, is permissible as long as the meal or entertainment is not of more than nominal value. Gifts of money are prohibited regardless of the amount.

*Fundraising:* The "Anti-Kickback Statute," prohibits accepting a gift or donation which is intended, or implied, as a kickback and/or incentive for business or services. There is no prohibition against the offer, or acceptance, of a gift or donation intended to support the charitable mission of Baptist Homes Society. Acceptance of such a gift or donation from a business partner or vendor does not imply that a relationship will be preserved, result in increased business or preferential treatment, result in recommendations or referrals, or be considered in making any decisions related to the preservation of a relationship with that vendor or business partner.

*Contracts:* We conduct our contract development process in accordance with established organization policies. Staff and Board members must not disclose proprietary information about the organization in order to further their own interests, or those of a vendor, or contractor. Staff and Board members must disclose any personal relationships or business activities with contractors that may be perceived as influencing the performance of their duties.

*Marketing:* Marketing practices are conducted with truth, fairness, and responsibility to residents, the community and the public at large. All information issued is accurate at the time of publication, and is not presented in an intentionally misleading manner. Baptist Homes Society will not purposely misrepresent its services, supply needs, or any other aspect of its business.

*Power of Attorney:* It is the policy of Baptist Homes Society to enforce the regulatory prohibition that no employee, (unless for an immediate member of family), member of the Board, or anyone having a financial interest in the facility may assume power of attorney for a resident, unless ordered by a court of competent jurisdiction.

## **5. Contacts from Government or Other External Auditors**

Baptist Homes Society is committed to full compliance with all state and federal laws and cooperates with all reasonable demands made in any governmental investigation of Baptist Homes Society, its employees, or agents. However, Baptist Homes Society deems it essential that the legal rights of Baptist Homes Society, its employees, and agents are protected. If any employee receives a subpoena, inquiry or other legal document concerning Baptist Homes Society, whether at home or in the workplace, from any governmental agency, the employee shall first notify his/her supervisor who shall then alert the Corporate Compliance Officer. The Corporate Compliance Officer shall alert the President & CEO, and Baptist Homes Counsel, as soon as possible. The contacted employee may request the assistance of counsel or appropriate Baptist Homes Society personnel prior to responding to inquiries. Baptist Homes Society may provide access to Counsel for such employees. However, by making Counsel or staff available, Baptist Homes Society has no intent to interfere with or deter a lawful government investigation.

## **6. Accounting and Financial Reporting**

### ***Accounting***

All Baptist Homes Society assets and financial transactions are accurately and properly documented in accordance with generally acceptable accounting principles. Federal law requires that our books and records accurately reflect all transactions, including any payment of money, transfer of property, or furnishing of services. We comply with a variety of laws regarding the retention of books, records, and documents. Staff members cooperate fully with auditors or legal counsel retained by the organization to conduct audits or investigations pertaining to this guideline.

### ***Cost Reports***

It is the policy of the organization to accurately record and allocate its costs in accordance with Medicare and Medicaid regulations. Medical and business documents and records are retained in accordance with the law and the organization retention policy.

### ***Billing***

Baptist Homes Society is committed to full compliance with the specific billing and coding requirements of the Medicare and Medicaid programs and other third party payors, and outlines that procedure in its corporate compliance responsibilities policy # 118. Baptist Homes Society expects that all staff members, professionals, and contractors are familiar with these requirements, and employs oversight mechanisms for all billing services. To assure that Baptist Homes Society is billing Medicare properly, the organization periodically conducts an audit of its claims, either directly or through an outside consultant.

Baptist Homes Society recognizes that current law requires health care providers to report and return identified governmental overpayments within the later of: (a) sixty (60) days after identification; or (b) the date the cost report for the fiscal period at issue is due. Baptist Homes Society shall conduct any investigation of suspected misconduct with this obligation in mind, and should credible evidence of misconduct be discovered, the Corporate Compliance Officer shall confer with Counsel to discuss the method and means of complying with its governmental reporting and refund obligations.

## **7. Human Resources**

### ***Controlled Substances***

The use, sale, or possession of controlled substances or alcohol on Baptist Homes Society property is strictly prohibited, except as normal course of business, such as authorized sale of alcoholic beverages through Dining Services.

### ***Criminal Background Checks***

Baptist Homes Society shall comply with the requirements of the Pennsylvania Older Adults Protective Services Act, 35 P.S. § 10225.101 et seq. (“OAPSA”), as well as the provisions of the Elder Justice Act contained within the Patient Protection and Affordable Care Act, Pub. L. 111-148, 124 Stat. 199 (“EJA”). To this end, Baptist Homes Society shall not hire an applicant, or retain an employee required to submit information under the OAPSA, or who has committed any of the offenses listed within the OAPSA or violated the reporting requirements of the EJA. Baptist Homes Society already has policies and procedures regarding the application and hiring process to comply with the requirements of the OAPSA and the EJA, and their successor provisions. Categories of criminal offenses covered by the OAPSA include but are not limited to:

Criminal homicide	Aggravated assault	Kidnapping
Unlawful Restraint	Rape	Statutory Sexual Assault
Involuntary Deviate Sexual Intercourse	Sexual Assault	Aggravated Indecent Assault
Indecent Assault	Indecent Exposure	Arson & Related Offenses
Burglary	Robbery	Theft & Related Offenses
Forgery	Securing Execution of Documents by Deception	Obscene & Other Sexual Materials and Performances
Concealing Death of a Child	Endangering Welfare of Children	Dealing in Infant Children
Intimidation of Witnesses or Victims	Retaliation Against Witness or Victim	Prostitution & Related Offenses
Incest	Corruption of Minors	Sexual Abuse of Children
Felony Under Controlled Substance, Drug, Device & Cosmetic Act	Organized Retail Theft	

Baptist Homes Society shall remove any person in a position of authority where there is credible evidence that the person is not willing or unable to comply with this Plan. Baptist Homes Society shall implement procedures to terminate Baptist Homes Society employees or agents who are convicted or excluded from participation in federal programs, including immediate removal from direct responsibility or involvement in any federally funded health care program. Consistent with the Department of Public Welfare’s requirements for Medical Assistance providers, Baptist Homes Society will check available public sources, including, but not limited to, the Pennsylvania Medichex List maintained by DPW, the List of Excluded Individuals/Entities maintained by the Office of the Inspector General of the Department of Health and Human Services, and the Excluded Parties List System maintained by the General Services Administration on a monthly basis to verify the participation/exclusion status of employees, vendors, contractors, service providers and referral sources. Baptist Homes Society shall implement procedures to remove from direct responsibility or involvement in any federally funded health care program any Baptist Homes Society employee or agent with pending criminal charges relating to health care or proposed exclusion from participation in federally funded health care programs.

### ***Occupational Health and Safety Act (OSHA)***

The Occupational Safety and Health Act (OSHA) requires employers to provide a work environment that meets certain safety and health standards. Baptist Homes Society takes this responsibility seriously. We provide periodic education programs addressing the requirements of OSHA and the Baptist Homes Society Safety Program. Staff members are required to comply with established facility policies and procedures designed to meet these guidelines. A staff member who identifies a known or suspected workplace hazard must report it immediately to his/her supervisor.

### ***Sexual and Other Forms of Harassment***

Baptist Homes Society is committed to maintaining a professional work environment that is free from sexual and other illegal harassment, which can include harassment based on race, color, religion, sex, sexual orientation, national origin, age, disability, or any other classification protected by law. Any illegal harassment of any individual by staff, Board, physicians, contractors, and vendors is prohibited and will not be tolerated. Sexual harassment consists of both direct and indirect actions that create a hostile work environment.

### **8. Other Legal and Regulatory Requirements**

Baptist Homes Society complies with all laws and regulations that apply to our business, and will not knowingly take action in violation of these or any other applicable laws.

#### ***Political Advocacy***

Baptist Homes Society encourages staff members to take an active interest in political affairs, but political activities must not be conducted on the organization's time or premises. Staff members may not identify themselves as representatives of the organization in any political activity or in any contact with the news media that is not sanctioned by the organization.

Federal law strictly controls corporate involvement in the political process. For this reason, staff members are prohibited from making payments or loans, performing services, or furnishing anything of value to a political party or candidate in conjunction with their positions with Baptist Homes Society.

#### ***Compliance with Copyright Laws***

It is our policy to comply with copyright laws and other restrictions pertaining to the copying and dissemination of material contained in books, newsletters, and other periodicals.

The use of the computer software owned by the organization is limited by software licensing and copyright restrictions. Unauthorized use or copying of software is strictly prohibited.

#### ***Employment of Sanctioned Individuals***

Baptist Homes Society does not employ, contract with, or accept as a member of its Board or professional staff an individual or entity who is ineligible for participation in federal healthcare programs, including Medicare and Medicaid. Baptist Homes Society verifies that the individual or entity's name is not included in the database of sanctioned individuals maintained by the Office of Inspector General of the Department of Health and Human Services, the General Services Administration, or by the Department of Public Welfare.

#### ***Non-Discrimination***

Baptist Homes Society does not permit or tolerate any admission or employment decision or other discrimination based on race, color, religion, ancestry, national origin, age, gender, sexual orientation, or marital, familial, or disability status, or status as a covered veteran, or any other legally protected group status.

#### ***Referrals***

The "Anti-Kickback Statute", and the Stark Law represent federal regulations which basically prohibit the offer or receipt of anything of value in exchange for a referral for a service that may be paid for by the Medicare or Medicaid programs. Baptist Homes Society does not pay or accept payment from anyone (staff members, physicians, hospices, hospitals, or other healthcare providers) for referrals. Likewise, Baptist Homes Society does not provide non-cash benefits (such as office

space or support personnel) to any physician or other healthcare professional in exchange for referrals.

#### ***False Claims Act***

The False Claims Act makes it illegal for any person to, among other things, knowingly present, or cause to be presented, to an officer or employee of the Federal government, a false or fraudulent claim for payment or approval, or make, use, or cause to be made or used, a false record or statement to get a false or fraudulent claim paid or approved by the government. This act defines knowingly to mean that a person (a) has actual knowledge of the information; (b) acts in deliberate ignorance of the truth or falsity of the information; or (c) recklessly disregards the truth or falsity of the information. False claims against the government carry both financial and criminal penalties.

#### ***Program Fraud Civil Remedies Act***

This act allows the Department of Health and Human Services, and other federal agencies, to impose an administrative penalty upon individuals and entities who submit a false claim or series of claims with a value of less than \$150,000.

#### ***Medicaid Fraud and Abuse Control Act***

This act has both civil and criminal penalties, and makes it unlawful to submit false or fraudulent claims to the Medical Assistance program. The Pennsylvania Insurance Fraud law makes it a criminal offense to knowingly submit any false, incomplete, or misleading information concerning any material fact to an insurer or self-insured.

### **C. Reporting Compliance-Related Concerns and Questions**

#### ***Types of Issues to Report***

Baptist Homes Society requires staff members, Board members, physicians, contractors, and vendors to report any known or suspected violations of the law, our Code of Ethics, or related policies and procedures. Examples of compliance-related concerns, while not inclusive, can include:

- Known or suspected violations of legal or regulatory requirements, Baptist Homes Society Code of Ethics, or organizational policies and procedures;
- The loss or suspension of a staff member or contractor's clinical or professional license;
- A staff or Board member, contractor, or vendor receiving notice of exclusion from participation in the Medicare or Medicaid programs;
- A staff member's arrest or conviction for violating any law (excluding minor traffic citations).

#### ***Reporting Procedure and Compliance Hotline***

Concerns can be reported to the Corporate Compliance Officer either in person or via the confidential compliance hotline telephone number (412) 572-8360. This number rings directly to a private voice mailbox that is only accessed by the Compliance Officer (or a temporary designee appointed by the President & CEO). Callers to the hotline have the option of remaining anonymous, although that could, in some cases, limit our ability to conduct a thorough investigation of the concern.

#### ***Investigation and Follow-Up Action***

All reports of compliance concerns or questions are promptly documented, reviewed, and investigated by the Compliance Officer, or designee, in accordance with organization policy. The Compliance Officer will involve the President & CEO, Risk Management Committee, Board of Directors, and/or legal counsel, as appropriate, to achieve a satisfactory resolution, including implementing corrective action when indicated. Baptist Homes Society will respond appropriately to

any legal or regulatory violation and will take action to prevent future occurrences of the violation. Baptist Homes Society employees and agents shall cooperate fully with any investigation undertaken by the Compliance Officer, the designee and/or legal counsel.

### ***Non-Retaliation Policy***

Open communication is essential to the success of the compliance program. Baptist Homes Society will not enact, permit, or tolerate any form of retaliation against any individual who reports a compliance-related concern or question. A staff member who is involved in wrongdoing and reports it may be subject to disciplinary action for his/her own wrongdoing, although his/her forthrightness will be taken into consideration as the matter is investigated.

## **D. Disciplinary Action**

Baptist Homes Society staff members, Board members, physicians, contractors, and vendors are responsible for reporting known or suspected violations of the standard and for cooperating with compliance investigations. Failure to do so results in disciplinary action up to and including termination of the employment or business relationship, depending on the circumstances of a particular violation.

Any Baptist Homes Society employee accused of misconduct is given notice of the allegations, and the opportunity to respond to those allegations. Disciplinary action, as appropriate, is taken on a fair and equitable basis. An individual who deliberately makes a false accusation with the purpose of harming or retaliating against a colleague is subject to disciplinary action.

## **E. Education and Training**

### ***Initial Training and Certification***

All staff members are trained on the requirements of the compliance program at the time of hire. Staff members are required to acknowledge, in writing, that adherence to program requirements (as well as periodic revisions or updates) is a condition of their continued employment with Baptist Homes Society. Through the Risk Management Committee, all Board members, physicians, and selected contractors and vendors receive a copy of the corporate compliance plan, and related revisions and education, as appropriate.

### ***Ongoing Training and Education***

Departmental and facility-wide education which addresses the requirements of the compliance program and key areas of legal and regulatory compliance is provided on an ongoing basis, and participation is documented. Education is provided via in-service programs, written articles, attendance at an outside educational seminar, or other means. Emphasis is given to education and training for staff who are responsible for key compliance areas including resident care, coding, billing, marketing, and admissions.

The Risk Management Committee ensures that the organization has copies of the regulations and laws which apply to the Baptist Homes Society. The Compliance Officer is responsible for sharing information about new legal and regulatory requirements with Department Directors.

Department Directors are responsible for educating staff within their departments about the Baptist Homes Society Code of Ethics, compliance program guidelines, legal and regulatory requirements, and policies and procedures that apply to their particular job responsibilities.

## **F. Auditing and Monitoring**

### ***Monitoring the Corporate Compliance Program***

The Baptist Homes Society Quality Improvement (QI) program regularly monitors and reviews all legal requirements related to organization operations. The Corporate Compliance Officer and the Risk Management Committee monitor the implementation of the compliance program, and through the QI process, provide regular progress reports to senior management and the Board of Directors.

### ***Compliance Audits***

Auditing systems designed to prevent problems and monitor compliance in key legal and regulatory areas are an important element of an effective compliance program. Compliance audits include, but are not limited to, the Baptist Homes Society QI program, organization policies and procedures, CMS Quality Indicator Reports, new employee competency evaluations, billing, and audits conducted by external consultants to evaluate regulatory and legal compliance or other elements of the compliance program.

### ***Compliance as an Element of Performance Evaluation***

All Baptist Homes Society staff members will adhere to legal and regulatory requirements and the requirements of the Baptist Homes Society compliance program. Compliance with these requirements is evaluated in conjunction with the performance appraisal for each staff member. Additionally, Department Directors and other managers will communicate legal, regulatory, and compliance program requirements to the staff in their departments, and provide related training to reinforce understanding. Performance appraisals for Department Directors and managers include evaluation of their performance in these areas.



**Corporate Compliance Program  
Certification Form**

I have received a copy of the Baptist Homes Society Corporate Compliance Plan, and I understand the contents as they apply to my position or business relationship with the organization. I understand that I should consult the Corporate Compliance Officer directly or on the compliance hotline (412-572-8360) with any compliance related questions or concerns.

I understand that violation of the Baptist Homes Society Code of Ethics, compliance guidelines, or other facility policies may be cause for disciplinary action up to and including termination of my employment or business relationship with the organization.

I certify that I am in complete compliance with the Code of Ethics and compliance guidelines as they apply to my position or business relationship with Baptist Homes Society, and I agree to continue to comply with these requirements in the performance of my duties.

I certify that I have not been excluded from participation in Medicare, Medicaid, or any other federal healthcare program(s).

I certify that I have not been convicted of a criminal offense in the categories covered by this plan.

Name (please print) \_\_\_\_\_

Position or Business Relationship \_\_\_\_\_  
(staff member, Board member, physician, vendor, etc.)

Organization (if other than Baptist Homes Society) \_\_\_\_\_

Facility (please check) \_\_\_\_\_ Baptist Homes \_\_\_\_\_ Providence Point  
\_\_\_\_\_ Corporate Services

Signature \_\_\_\_\_ Date \_\_\_\_\_

Distribution: Employee Personnel File or Board, Contractor, or Vendor File