

<b>Policy Title:</b> Compliance & Integrity			
<b>Department Responsible:</b> THN Compliance & Integrity	<b>Policy Number:</b> CPE-002	<b>THN's Effective Date:</b> January 1, 2022	<b>Next Review/Revision Date:</b> September 30, 2024
<b>Title of Person Responsible:</b> THN Director of Compliance	<b>THN Approval Council:</b> THN Compliance and Privacy Committee	<b>Date Approved:</b> June 9, 2023	<b>Date Approved by THN Board of Managers:</b> <b>August 15, 2023</b>

- I. **Purpose.** The purpose of CPE-002 is to describe how Triad HealthCare Network's (THN's) Compliance Program complements federal and state laws and regulations.
- II. **Policy.** THN is committed to compliance with all relevant federal and state statutory and regulatory requirements. THN's Compliance Program expounds on applicable laws and regulations. In case of inconsistencies, these legal authorities take precedence over the Compliance Program unless the Compliance Program imposes stricter requirements.
- III. **Procedure.**
  - A. **Compliance & Integrity Oversight Structure.**
    1. **Board of Managers**
      - a. Receive and review reports from the Compliance Officer (CO).
      - b. Evaluate the effectiveness of the Compliance & Integrity Program.
      - c. Review high risk issues of compliance.
    2. **Compliance Officer (CO)**
      - a. Is an employee that is not legal counsel; does not have operational accountabilities; and reports to the Board of Managers.
      - b. Provide in person, a report to the President on the Compliance & Integrity Program at least quarterly.
      - c. Provide in person, a report to the Board of Managers on the Compliance & Integrity Program at least four times per year.
      - d. Operationalizes the Compliance & Integrity Program, including, but not limited to mechanisms for identifying and

addressing potential compliance concerns; methods for reporting potential compliance issues, including the capability to report anonymously; and compliance monitoring and auditing.

- e. Develops written policies and procedures and a Code of Conduct that supports THN's policy to comply with all applicable federal, state, and local laws and regulations.
- f. Operationalizes the components of the Code of Conduct.
- g. Distribute the applicable policies and procedures and Code of Conduct.
- h. Provide general compliance and fraud, waste, and abuse (FWA) training.
- i. Chair the Corporate Compliance & Integrity Committee, which is responsible for overseeing the Compliance & Integrity Program

**3. Departmental Management**

- a. Will help ensure that employees understand and participate in the Compliance & Integrity Program, training and understanding of their responsibilities.
  - b. Monitor Compliance & Integrity.
- B. Develop departmental specific policies and procedures that support applicable laws and regulations. THN and all THN Related Individuals are required to comply with all relevant and applicable federal and state statutory and regulatory requirements, including but not limited to the requirements detailed in the Accountable Care Organization Realizing Equity, Access and Community (ACO REACH) Participation Agreement (PA).
- C. THN's policies and procedures are not substitutes for actual laws, regulations, or rules to which they relate. THN's policies and procedures supplement applicable laws, regulations, and rules (and do not modify or replace them).
- D. In the event of an inconsistency between a policy or procedure in THN's Compliance Program and applicable laws, regulations, or rules, all THN Related Individuals are to follow the applicable laws and regulations, unless THN's compliance policy or procedure imposes stricter requirements.

Date	Reviewed	Revised	Notes
January 1, 2022			Originally Published
August 2022	X		No changes
May 2023		X	Converted to REACH
