

Policy Title: Compliance & Privacy Committee			
Department Responsible: THN Compliance & Integrity	Policy Number: OP-101	THN's Effective Date: January 1, 2022	Next Review/Revision Date: September 30, 2024
Title of Person Responsible: Director of Compliance	THN Approval Council: THN Compliance and Privacy Committee	Date Approved: June 9, 2023	Date Approved by THN Board of Managers: August 15, 2023

- I. **Purpose.** The purpose of OP-101 is to promote a culture of compliance and integrity within Triad Healthcare Network (THN) and with our business partners.

- II. **Policy.** The Compliance & Privacy Committee is responsible for providing effective oversight of, and support for, compliance and privacy by operational area. Committee members are responsible for:
 - A. Sharing information that pertains to the key drivers of fraud, waste, and abuse (FWA).
 - B. Participating in effective detection, prevention, and recovery of risks.
 - C. Monitoring key performance indicators and corrective action plans.
 - D. Approving the Annual Work Plan.

- III. **Procedure.**
 - A. The Compliance & Privacy Committee will meet at least once per quarter or more frequently as necessary to enable:
 1. Reasonable oversight of the compliance program.
 2. Strategies to promote compliance and detect any potential violations.
 3. The review and approval of compliance and FWA training to ensure that training and education are effective and appropriately completed.
 4. Development and implementation of the compliance risk assessment and the compliance monitoring and auditing work plan.
 5. Development, creation, implementation, and monitoring of effective corrective actions.
 6. Innovative ways to implement appropriate corrective and preventive action.
 7. Effectiveness review of the internal controls designed to ensure compliance with ACO REACH model regulations in daily operations.

8. Support of the Compliance Officer's needs for sufficient staff and resources to carry out his/her duties.
 9. Appropriate and up-to-date compliance policies and procedures.
 10. A system for employees, ACO Participants, ACO Providers/Suppliers, and others acting on behalf of THN to ask compliance questions and report potential instances of noncompliance, Medicare ACO program noncompliance, and FWA confidentially or anonymously without fear of retaliation.
 11. A method for Medicare Beneficiaries to report potential FWA.
 12. The review of audit reports, which include monitoring and auditing risks, program noncompliance, or potential FWA, and implement and monitor corrective action plans for effectiveness.
 13. Regular and ad hoc reporting on compliance status with recommendations to the Board of Managers.
- B. Responsibilities of the Chair.**
1. Effectively plan meetings, schedule meetings, develop the agenda, and ensure appropriate reports on compliance and ethics are presented.
 2. Maintain a record of the meeting notes and any open items.
- C. Responsibilities of the Members.**
1. Support your Compliance & Privacy Program by attending the meetings or sending an appropriate representative to make decisions on your behalf.
 2. Promote a culture of compliance and integrity by asking questions and raising issues.
 3. Be prepared to discuss issues impacting your operational area.
- D. Meeting Logistics.**
1. The Committee will meet at least four (4) times per year and other meetings will be called as needed.
 2. Standing agenda topics include:
 - a. Approval of previous meeting notes.
 - b. Annual Work Plan Review and Updates.
 - c. The Privacy Report.
 - d. Data movement review.
 - e. Compliance and Privacy Report to Board of Managers (BOM).



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