



Policy Title: Compliance Officer: Duties and Responsibilities			
Department Responsible: THN Compliance & Integrity	Policy Number: CO-001	THN's Effective Date: January 1, 2022	Next Review/Revision Date: September 30, 2024
Title of Person Responsible: THN 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 CO-001 is to outline (1) the duties and responsibilities of Triad HealthCare Network's (THN's) Compliance Officer. THN's Compliance Officer shall implement a Compliance Program and work together with the Compliance Committee and Board of Managers to ensure its effectiveness.
- II. **Policy.** THN is committed to maintaining an effective compliance program that promotes compliance with the laws and regulations that govern the operation of the organization. In furtherance of this commitment, the Board of Manager has established the position of THN's Compliance Officer. THN's Compliance Officer shall have the authority, qualifications, and skills necessary to meet the scope and objective of THN's Compliance Program.
- III. **Procedures.**
 - A. THN shall audit and document compliance with the CO Policies and Procedures. Such an audit shall be conducted pursuant to the Audits, Monitoring, and Oversight (AMO) Policies and Procedures. Relevant documentation, which may include electronic documentation, shall be maintained on the Cone Health SharePoint site, consistent with THN's document retention policies but, in no case, for a period of less than ten years.
 - B. **Appointment of THN's Compliance Officer.**
 1. THN's Board of Managers, in consultation with others as appropriate, shall appoint a THN Compliance Officer.
 2. THN's Compliance Officer shall be a senior management level individual and shall report directly to the THN Board of Directors. THN's Compliance Officer shall not be (nor be subordinate to) the General Counsel or the Chief Financial Officer.
 3. When THN's Compliance Officer is appointed, an announcement concerning the appointment shall be circulated to all THN-Related Individuals, along with the Compliance Officer's contact information.



4. THN's Compliance Officer shall make regular, but at least quarterly, reports to THN's Compliance Committee and Board of Managers.

C. Qualifications.

1. THN's Compliance Officer shall have credentials and experience appropriate for (a) understanding THN's various business lines, and (b) executing the duties and responsibilities set forth in the Compliance Program.
2. THN's Compliance Officer shall demonstrate high integrity, good judgment, assertiveness, an approachable demeanor, and elicit respect and trust from THN-Related Individuals.
3. THN's Compliance Officer must have sufficient time to dedicate to the Compliance Officer position and its duties.
4. THN's Compliance Officer may not serve as legal counsel to THN.

D. Authority of THN's Compliance Officer.

1. THN's Compliance Officer shall have authority to (1) review all THN documents and other information relevant to compliance activities (including, but not limited to, medical records, contracts, personnel records, and company e-mails), and (2) interview all THN-Related Individuals, as necessary, to discharge his or her duties and responsibilities.
2. THN's Compliance Officer shall have sufficient management authority, responsibility, and resources to permit the effective performance of his or her duties as outlined below.
3. THN's Compliance Officer shall have the authority to report to the Cone VP, Chief Compliance Officer, regarding compliance matters at any time.
4. THN's Compliance Officer shall have direct access to all other senior management and legal counsel (in-house or outside), as appropriate and necessary.
5. THN, as directed by the Board of Managers or otherwise, may commission an independent review to verify any findings of THN's Compliance Officer.

E. Duties and Responsibilities. THN's Compliance Officer shall be responsible for the development, implementation, operation, monitoring, and maintenance of THN's Compliance Program. THN's Compliance Officer may delegate certain aspects of his or her duties and responsibilities, provided THN's Compliance Officer appropriately supervises any such delegee, and retains ultimate responsibility for each duty and responsibility. More specifically, THN's Compliance Officer shall be responsible for:

1. Overseeing and monitoring the day-to-day implementation and operation of THN's Compliance Program, including the supervision of other THN-Related Individuals who assist with Compliance Program efforts.



2. Ensuring that adequate procedures are established to (1) monitor changes in the ACO REACH Model and other applicable federal or state laws and regulations, that may affect existing contractual obligations or changes in electronic data transmission and storage of health information privacy and security requirements; and (2) inform the CCO and Board of Managers of such relevant changes in law or regulation.
3. Making reasonable efforts to stay abreast of current, relevant regulatory materials, publications, web sites, and guidance issued by government agencies, including CMS, CMMI, HHS or HHS-OIG, regarding the ACO REACH Model and other state and federal laws and regulations.
4. Reporting on a regular basis (and at least quarterly) to THN's Board of Managers or a subcommittee thereof, and reporting periodically, as necessary, and appropriate, to CCO counsel on compliance issues and the status of THN's Compliance Program, unless such reporting would compromise an ongoing investigation or other confidential information.
5. Developing written Policies and Procedures that are designed to: (a) implement THN's Compliance Program; (b) address existing and new compliance risk areas; and (c) ensure compliance with the ACO REACH Model and other applicable federal or state laws and regulations.
6. Periodically reviewing, updating, and amending THN's Compliance Program, including the Code of Conduct and THN's Policies and Procedures, as appropriate.
7. Developing, coordinating, and appropriately documenting THN's compliance-related educational and training programs, and reviewing and updating such programs as necessary, but at least on an annual basis.
8. Seeking to ensure that THN-Related Individuals are aware of and comply with applicable laws and regulations and THN's Compliance Program (including the Code of Conduct and THN's Policies and Procedures).
9. Coordinating with THN Operations and/or Participants, as appropriate, to ensure that THN-Related Individuals are screened against HHS-OIG's and GSA's Excluded Parties lists, pursuant to THN's Hiring, Employment and Contracting Policies and Procedures.
10. Ensuring that THN-Related Individuals (a) have access to THN's Compliance Plan, Code of Conduct, and THN's Policies and Procedures, and (b) are otherwise appropriately informed of THN's Compliance Program, upon hire or contracting.



11. Appropriately publicizing the existence of the mechanisms for reporting suspected instances of non-compliance.
12. Coordinating any internal and external compliance reviews of THN’s business operations and practices (and assisting with the same, as necessary, and appropriate).
13. In coordination with legal counsel, and on an as-needed basis, reviewing any new THN business arrangements involving federal or state health care programs to ensure that these arrangements comply with relevant laws and regulations, as applicable.
14. Responding appropriately to compliance questions and inquiries.
15. Ensuring that reported compliance concerns are appropriately entered into THN’s Compliance Log (pursuant to CIT-003) and addressed and documented.
16. Investigating suspected violations of applicable laws and regulations and taking corrective action, where appropriate, and coordinating with or through in-house or outside legal counsel, as appropriate, on such investigations.
17. Recommending, overseeing, and documenting disciplinary action and other remedial measures, where appropriate.
18. Consulting with in-house or outside legal counsel for legal advice and guidance, as appropriate.
19. Developing an annual Compliance Work Plan and presenting such Compliance Work Plan to the CCO and Board of Managers.

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