



Policy Title: Policy and Procedure Processes			
Department Responsible: THN Compliance & Integrity	Policy Number: CMR-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 Board of Managers	Date Approved: August 29, 2022	Date Approved by THN Board of Managers: August 29, 2022

I. Purpose. The purpose of CMR-001 is to provide (1) a statement of Triad HealthCare Network's (THN's) policy regarding the development, review and revision, and approval and dissemination of new and/or revised Compliance Program documents, including the Compliance Plan, Code of Conduct and Policies and Procedures, and to establish a policy regarding retiring Policies and Procedures implementing THN's Compliance Program, and (2) procedures to ensure that THN's practices are consistent with its stated policies.

II. Policy.

- A. THN shall develop new Policies and Procedures as necessary in response to updates or changes to applicable laws, regulations and/or guidance, identification of compliance issues related to THN Operations, or new processes implemented within THN.
- B. THN shall periodically, but no less than annually, review and revise, as appropriate, existing Compliance Program Documents, including the Compliance Plan, Code of Conduct, and Policies and Procedures to ensure consistency of its practices with applicable laws and regulations.
- C. THN shall approve its Compliance Plan, Code of Conduct and Policies and Procedures developed pursuant to the Compliance Program to ensure consistency of its practices with applicable laws and regulations.
- D. THN shall disseminate its Compliance Plan, Code of Conduct, and Policies and Procedures to all THN Related Individuals in a manner that ensures consistency of its practices with applicable laws and regulations.
- E. THN shall retire its Policies and Procedures in a manner that ensures consistency of practices with applicable laws and regulations.

III. Procedures.

- A. **Development of New Policies and Procedures.**



1. New Policies and Procedures are developed by the relevant operational area or division of THN, in conjunction with the Compliance Officer.
2. In developing such Policies and Procedures, the Operational Leaders and THN's Compliance Officer shall consider (and incorporate):
 - a. Topics and standards designed to foster and maintain high ethical standards and fair and honest conduct; and
 - b. Compliance guidance issued by HHS-OIG is fundamental to an effective THN Compliance Program, as well as other authoritative sources of compliance guidance, such as the Federal Sentencing Guidelines.
3. The Policies and Procedures shall address any "risk" areas that are deemed relevant and appropriate to address by THN's Compliance Officer, in conjunction with the Board of Managers, considering THN's business operations. In determining appropriate risk areas to address, THN's Compliance Officer and the Board of Managers shall consider any relevant CMS and HHS-OIG compliance program guidance, reports, and/or settlements, as well as any relevant "risk" areas identified by other agencies of federal or state government.
4. All Policies and Procedures should be clear and concise and follow the same general format.
5. New Policies and Procedures shall be discussed with the appropriate persons in the affected division(s).
6. Once developed, Policies and Procedures must be approved as set forth in this document.

B. Review of Compliance Plan, Code of Conduct, and THN's Policies and Procedures.

1. THN's Compliance Officer, in conjunction with the Board of Managers and appropriate THN Operational Leadership, shall review the Compliance Plan, Code of Conduct and all Policies and Procedures as necessary, but, at a minimum, once every twelve (12) months.
2. THN's Compliance Officer shall modify and amend the Compliance Plan, Code of Conduct and/or Policies and Procedures, as appropriate, to reflect: (1) changes to the ACO REACH Model PA, regulation, or other program requirements; (2) changes in the nature or scope of THN's business (including THN's contractual obligations); and (3) indications that existing Policies or Procedures have been ineffective in preventing compliance



violations or that new or additional Policies and Procedures would be more effective in preventing or avoiding the recurrence of misconduct.

- a. When updating operational policies and procedures, the Compliance Officer shall work with appropriate business owners and THN Operational Leadership to ensure the effectiveness of edits made.
3. Where appropriate, THN's Compliance Officer, in conjunction with the THN Compliance Committee and appropriate THN Operational Leadership shall propose revisions to the Compliance Plan, Code of Conduct and/or Policies and Procedures.
4. Proposed revisions shall be discussed with appropriate people in the affected department(s).
5. Any revisions must be approved pursuant to the process below.

C. Approval of New/Revised Compliance Plan, Code of Conduct and Policies and Procedures.

1. Revisions to the Compliance Plan and Code of Conduct must be approved by THN's Compliance Officer and THN's Compliance Committee. After the Compliance Committee approves the Compliance Plan and Code of Conduct, the new or revised documents will be presented to the Board of Directors for final approval.
2. Revisions to existing Policies and Procedures may be made and implemented based on the approval of the Compliance Officer, as awaiting approval by the Compliance Committee can lead to significant delays in THN operational practices. Policies and Procedures are reviewed and approved by the Compliance Committee annually.
3. All new Compliance Policies must be approved by the Compliance Committee. After the Compliance Committee approves the new Compliance Policies, the documents will be presented to the Board of Directors for final approval.
4. Operational policies must be approved by the Operations Committee. These policies do not go to the Board of Directors for approval.

D. Dissemination of New/Revised Compliance Plan, Code of Conduct, and Policies and Procedures.

1. THN shall disseminate any new or revised Compliance Plan, Code of Conduct, and/or THN's Policies and Procedures pursuant to TD-001, electronically or via THN website, within 90 calendar days of approval.



E. Retiring Policies and Procedures.

1. THN's Compliance Officer, a member of the THN Compliance Committee, may propose that a Policy and Procedure be retired.
2. For a Policy and Procedure to be retired, THN's Compliance Officer and any appropriate Operational Leaders must concur that the Policy and Procedure has become obsolete.
3. Retired Policies and Procedures shall not be destroyed but shall be removed from current distribution and appropriately archived 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.

- F. THN's Compliance Officer shall maintain copies in the Cone Health SharePoint site of all versions of the Compliance Plan, Code of Conduct, and Policies and Procedures, consistent with RR-001.

Date	Reviewed	Revised	Notes
January 1, 2022			Originally Published
August 2022	X		No changes
May 2023		X	Converted to REACH Changed name of policy Added sections C(3)-(4)