Med-Net Compliance and Ethics Policy Manual

Client Orientation
July 2019

Med-Net Compliance, LLC

Purpose:

- The integrated *Corporate Compliance and Ethics Manual* consolidates and replaces policies from the four existing Med-Net manuals (Fraud, Finance, Privacy, and HR).
- The integrated Policy Manual is indexed in a customer-friendly and searchable hierarchy framework.
- It is amenable to real-time and annual updating.
- The *Corporate Compliance and Ethics Manual* is a source document for the Company Compliance and Ethics program and the Compliance Officer Qualification credential (CO-Q)
    - Enables client self-sufficiency in searching relevant policies in real time.

Functional Framework

The Manual references a Key Functions Framework for the integration of key compliance functions:

1. COMPLIANCE AND ETHICS PROGRAM (CP)
2. FINANCIAL INTEGRITY (FI)
3. VENDOR and ASSOCIATE CONTRACTS and SERVICES (VC)
4. BUSINESS PRACTICES (BP)
5. PRIVACY PLAN (PP)
6. DATA INTEGRITY (DI)
7. RESIDENT RIGHTS AND ELDER JUSTICE (RR)
8. WORKFORCE MANAGEMENT (WM)
9. SAFETY, SECURITY, AND RISK MANAGEMENT (SM)
10. QUALITY CARE AND IMPROVEMENT (QAPI)
11. INFECTION PREVENTION AND CONTROL (IC)
12. CLINICAL PRACTICES (CL)
13. STATE SPECIFIC REQUIREMENTS

Manual Structure

- Tools, forms, lists, and checklists are separate from policy content and is in the chapter appendices.
- The manual contains federal compliance requirements.
- Chapter 13 contains links to state specific compliance requirements that complement federal requirements

Interactivity

- There are hot links throughout the manual to enable cross-referencing of content.
  - The electronic version of the Manual is interactive.
  - The *Table of Contents* is hyperlinked to each chapter.
  - Within each chapter is an index with hyperlinks to each policy.
    - Click on the chapter or policy to access it directly.
  - Throughout the Manual are links in blue text.
    - Click on the blue text to be redirected to a related policy/section/appendix, or to an outside website link containing additional information on the topic being discussed.
  - Searchability is active for easy topical issue access

Standardization

- The Med Net *Corporate Compliance and Ethics Manual* is intended to provide our client facilities with a workable policy manual that can be adopted "as is" for federal laws, rules, and regulations. As such, it is the "go to source" for meeting federal compliance and ethics requirements.
- After corporate review, the client facility can individualize state specific requirements for their centers. State specific requirements are referenced through links in Chapter 13.
- The Company's own policies and procedures must be documented and adhered to.

Governing Body

- Front Matter contains adoption and approval page.
  - Approval by QAPI/QAA Committee
  - Adoption by Governing Body
- Once the Governing Body adopts the Manual for use, it can be individualized for organization use:
  - Clients can use the fillable Word Document of the *Manual Title* page and *Approval for Use* page by inserting their organization information at the greyed areas and inserting these pages into their public (print) copy.
- The Governing Body updates the adoption of this Manual on an annual basis.
  - The Client Company must authorize the approval of the Manual and document its acceptance for its centers on a regular basis.

Scope of Manual Update

- Med-Net Concepts, LLC has a workplan for ongoing review and revision with updates to be communicated in real time to clients.
- Policy updates are printed onsite at the Client Company and added to the public (print) copy of the manual to keep it current.

Clinical Policies and Procedures

- The *Corporate Compliance and Ethics Manual* excludes clinical policies and procedures.
- Clinical policies and procedures are deferred to and found in the Med-Pass manuals.
- Med-Net customers receive a discount from Med-Pass for their clinical policy and procedure manual.
  - The Med-Pass policies can be accessed at http://www.med-pass.com/ and using the discount code: **MedNet10**.

Manual Access and Location

- The *Corporate Compliance and Ethics Manual* will be:
  1. Disseminated to clients electronically via PDF
  2. Real-time updates are communicated by Client Relations
     - Official Med-Net Newsletter
     - On the Compliance Committee meeting agenda (Compliance Specialists)
     - Documented in Compliance Committee meeting notes
     - The Company prints the update and inserts it into the print copy of the manual to keep it current
  3. Released annually as an updated PDF to participating clients

Public Access

- Client Companies must make portions of the Compliance Manual accessible for private viewing in their facility.
  - Do not need to print appendices for posting
  - Create a three-ring binder to store the manual
  - Post on the public bulleting board where the manual can be viewed
- Updates are printed by Client Company staff and inserted into the designated section of the print copy of the Manual to retain it current.

Compliance Officer Training and Qualification Program (CO-Q)

- The Compliance Officer Qualification (CO-Q) can be earned by completing the CO Curriculum and taking a comprehensive exam.
- The CO-Q content is taken from the Integrated *Compliance and Ethics Manual*
- The CO-Q program includes Seven Modules based on the Seven Compliance elements:
  - Element 1: Standards, Policies and Procedures
  - Element 2: Program Administration
  - Element 3: Screening and Evaluation of Employees, Physicians, Vendors and Other Agents
  - Element 4: Communication, Education, and Training
  - Element 5: Monitoring, Auditing, and Internal Reporting Systems
  - Element 6: Counseling and Discipline
  - Element 7: Investigations and Remedial Measures

Questions