

# **GEISINGER HEALTH SYSTEM\***

## **CORPORATE COMPLIANCE PROGRAM OVERVIEW**

It is the Geisinger Health System's ("Geisinger's") intent to uphold the business integrity required of a participant in federally funded healthcare programs and all of its other business affairs. Geisinger's delivery of healthcare services must be in compliance with all applicable laws and regulations. Geisinger seeks proactive identification of any concerns and issues relating to potential noncompliance and requests employees and vendors to abide with Geisinger's policies and procedures designed to minimize noncompliance. Compliance is challenging because the regulatory requirements governing healthcare reimbursement and other business activities are complex and changing. To underscore and enhance its commitment and to better assist in this area, Geisinger is committed to the following Corporate Compliance Program. This document is designed to provide Geisinger's vendors and contractors with an overview of the Compliance program and Geisinger policy on prevention of fraud, waste and abuse.

### **PURPOSE**

The purpose of Geisinger's Corporate Compliance Program is to:

1. Accentuate Geisinger's commitment to accurate submission of all claims and other filings to third parties;
2. Define employee responsibility to comply with all applicable laws and regulations governing the organization's business affairs;
3. Establish total organizational accountability for corporate compliance from the Board of Directors through all levels of management, staff, and employees;
4. Provide a process by which any employee can identify and confidentially report potential noncompliance exposures;
5. Provide guidance to management regarding the need for preventive and self-check measures to ensure compliance with all applicable laws and regulations;
6. Establish mechanisms to develop and coordinate ongoing effective training and education;
7. Maintain an organizational corporate compliance framework with a reporting relationship to the Board of Directors;
8. Establish effective lines of communications;

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\* Throughout this document the terms "Geisinger Health System" or "Geisinger" shall refer to the entire healthcare system comprised of the Geisinger Health System Foundation (the "Foundation") as parent and all subsidiary corporate entities comprising Geisinger. The Geisinger Health Plan, Geisinger Quality Options, Inc. and Geisinger Indemnity Insurance Corporation, however, maintain a companion corporate compliance program structure, policies, and procedures oriented to the regulatory environment of insurance industry and operations.

9. Conduct internal auditing and monitoring specifically on corporate compliance matters;
10. Set forth enforcement standards through well-publicized disciplinary guidelines; and,
11. Respond promptly to detected problems and undertake corrective action.

### CORPORATE COMPLIANCE COMMITTEES

Corporate compliance committees will oversee and coordinate the Corporate Compliance Program. These committees will report regularly to the Audit Committee of Geisinger Health System Foundation Board of Directors. Executive leaders chair the corporate compliance committees and share joint responsibilities for compliance with Corporate Compliance Officers. Geisinger's Legal Services and Internal Audit Departments serve as ad hoc members on the corporate compliance committees. The corporate compliance committees are: the Physician Coding and Documentation Committee; the General Billing Compliance and System Accuracy Review Committee; and the System Ancillary Department Billing and General Compliance Committee. In addition, the Insurance Operations maintain a companion corporate compliance program oriented to the regulatory environment of insurance operations. The corporate compliance committees are subcommittees of the System Leadership Council.

Additionally, a Corporate Compliance Coordinating Committee ("CCCC"), comprised of the chairs of the three compliance committees, Legal Services, Internal Audits, Human Resources and the Executive Vice President ("EVP")-Insurance Operations, or a designee, and chaired by the EVP-Chief Operating Officer ("COO"), will meet as needed, but at least annually; coordinate annual audit plans; discuss trends and issues in corporate compliance; coordinate and discuss noncompliance, investigations, and other matters that cross over areas of primary corporate compliance committee responsibility; and coordinate any overlap of issues between the Geisinger clinical enterprise and Insurance Operations.

### PROCEDURE

- A. Geisinger has implemented procedures to proactively identify issues relating to potential noncompliance exposures and developed mechanisms for audits.
  1. Corporate Integrity Program
    - a. Public Display of Intent to Comply — Geisinger's Corporate Compliance Statement will be displayed within every department.
    - b. Educational Program Requirement — A self-directed educational program will be presented to every department/site within Geisinger on an annual basis.
    - c. Job Performance Requirement — All position descriptions and performance appraisals will incorporate corporate compliance responsibilities and assessments, respectively.

- d. Geisinger's Code of Conduct policy will be reviewed and accepted by every employee, available on Geisinger's Infoweb, and distributed to all firms, vendors, and suppliers with which Geisinger conducts business. Additionally, Financial Management will maintain a companion "Finance Department Code of Ethics Policy."
- e. Compliance Hot Line – Geisinger has contracted with an outside call service to allow employees and others to make confidential/anonymous reports regarding suspected cases of fraud and abuse. Postings regarding this service will be found throughout the System as well as in the employee handbook and in various educational resources.

The Anonymous Hotline Compliance Number for the Health System is

1-877-557-7GHS or 1-877-557-7447

The Anonymous Hotline Compliance Number for the Health Plan is

-1-800-292-1627

Individuals are also encouraged to contact the following numbers in they have any compliance concerns:

-Legal Services at 1-570-271-6781;

-Internal Audits at 1-570-271-8111

-Professional Reimbursement and Compliance 1-570-271-6489

- f. Geisinger's Institutional Conflicts of Interest Policy – Provides a mechanism by which employees may review and help resolve potential conflicts of interests between personal business matters and institutional pursuits.
  - g. Geisinger's Research Conflicts of Interest Policy – A similar mechanism exists for examining and resolving conflicts in the research setting.
2. Review of Billing Practices and Operations to Proactively Identify Potential Exposures.
- a. Departmental Self-Audits
  - b. Internal Audits Oversight
  - c. Documentation of Procedures
  - d. Use of Outside Consultants
3. Corporate Compliance Committees
- a. Physician Coding and Documentation Committee — chaired by EVP-Chief Medical Officer ("CMO").
  - b. General Billing Compliance and System Accuracy Review Committee — chaired by EVP-Chief Financial Officer ("CFO").

c. System Ancillary Department Billing and General Compliance Committee — chaired by EVP-COO. Key departments involved with this committee include:

- Radiology
- Laboratory Medicine
- System Therapeutics
- Information Technology
- International Shared Services
- Diversified Services: Home Health and Hospice Services, Home Infusion Services, Durable Equipment Services
- Durable Medical Equipment and Home Infusion Therapy
- Human Resources:
- Supply Chain Management Services

- B. Each committee assumes responsibility for the respective key topics and develops annual action plans for auditing, communications, education, and review of these and other topics as appropriate.
- C. All employees are encouraged to report potential exposure issues or violations of the Corporate Integrity Program.
- D. The Corporate Compliance Statement is incorporated into the Employee Handbook which includes references to the False Claims Act provisions and Geisinger's whistleblower protection.
- E. Employees are informed of their responsibility to comply with the principles of the Corporate Compliance Program. New employees are educated about these principles and the Code of Conduct Policy through the employment orientation process.
- F. Each Department Manager shall ensure the discussion of the department's requirement of the Standards of Conduct within four (4) weeks of initiating employment of a new employee.
- G. A notice that details Geisinger's commitment to comply with all applicable laws and regulations in the conduct of its business will be posted in prominent places accessible to employees and others.
- H. Training sessions will inform and educate employees of applicable laws, regulations, and standards of business conduct that employees are expected to follow and consequences both to the employee and to Geisinger for noncompliance.

