



University of Florida, Pediatric Integrated Care System

Compliance Program

Policy: Ped-I-Care Compliance Program **Number:** CD-0001

Programs: Title XIX and Title XXI

Effective Date: Title XIX January 24, 2008

Title XXI August 1, 2013

(Revisions are effective 45 days after AHCA approval for Title XIX and after CMS approval for Title XXI.)

Approved by:

Title	Name	Signature	Ped-I-Care Approved	CMS Approved	AHCA Approved
Compliance Officer	Mark Hudak, M.D.	<i>Mark J. Hudak M.D.</i>	1/30/2008, 9/2/2008, 8/30/2010, 9/24/2012, 9/6/2013, 9/25/2015, 3/17/2016	3/2/2011	3/2/2011
Revised	1/4/2010, 7/1/2010, 1/15/2011, 10/22/2011, 11/21/2012, 8/8/2013, 12/27/2013, 1/8/2014, 9/14/2015, 3/8/2016				

Responsible Parties: Compliance Director, Compliance Department, Executive Administration (including decision-making committees, such as the Compliance Committee) and all Ped-I-Care employees.

Purpose

Ped-I-Care is committed to providing a high-quality, cost effective, and compliant health care plan. To achieve the goal of compliance with all governing rules, regulations, laws, standards, as well as self-imposed policies, Ped-I-Care depends upon its employees to be aware of and comply with these rules and regulations. Violations of governing laws, non-intentional as well as intentional, can expose Ped-I-Care to possible risks of substantial penalties and may ultimately affect the quality of health care services provided to members. Therefore, to avoid such

possibilities, Ped-I-Care has implemented a formal Compliance Program which applies to all departments, programs, and personnel associated with Ped-I-Care. With this formal, organization-wide Compliance Program, Ped-I-Care seeks to promote an environment which creates and expresses ideas that allows its employees to demonstrate the highest standards of conduct, adhere to applicable laws, and promote the highest quality of health care services while performing their daily work tasks. This policy and procedure set forth herein is demonstrative of commitment to the Ped-I-Care Compliance Program.

Policy

Ped-I-Care allots adequate resources for an effective Compliance Program. The program is intended to prevent, detect, and correct any violations pertaining to laws, rules, and regulations, standards as required by governing agents and accrediting agencies as well as self-imposed policies and standards of conduct as set forth by the organization. The Compliance Program includes but is not limited to:

1. Compliance Committee – Includes designated management to be responsible for the development, implementation, and overall effectiveness of the Compliance Program.
2. Code of Conduct – Ped-I-Care’s written standards that promote the organization’s commitment to compliance and ethical behavior to reasonably reduce risks related to misconduct.
3. Compliance Officer – Holds the position of senior-level leadership with the primary purpose for implementing, overseeing, and monitoring the effectiveness of the Compliance Program. Provides periodic reports to the Ped-I-Care Compliance Committee and the Advisory Board.
4. Internal and External Reporting for Health Care Fraud and Abuse – The Compliance Director/Compliance Department has established and maintains a reporting system for reporting health care fraud and billing abuse. Employees, providers, and members, without fear of retaliation/retribution, are encouraged to report information regarding suspected or actual acts of misconduct. All reports are responded to and investigated. Internal controls for policies and procedures are in place and are designed to prevent, detect, and report known or suspected fraud and billing abuse activities.
5. Training & Education – The Compliance Program includes development and implementation of communication to employees, upon hire and then annually, by which they are advised of policies and procedures relevant to remaining compliant with governing agencies; participation is mandatory. The Program also includes an online Fraud and Abuse Training module which is available for use by contracted providers and their staff.
6. Auditing & Monitoring – The Compliance Program develops and implements systems to audit and monitor (internally and assist with external evaluations as required) compliance with all laws, rules, regulations, and self-imposed policies; the systems are designed to detect and prevent areas of possible violations/risk and is conducted according to the Compliance Work Plan.

7. Corrective Action Plan – The Compliance Officer/Compliance Department investigates unusual incidents and develops and implements corrective action plans to ensure the integrity of the program. Procedures are in place to prevent and detect potential fraud and billing abuse.

Definitions

Please refer to latest version of CD-0014, the Policy and Procedure Definitions policy and procedure document, for all definitions.

Procedures

1. Ped-I-Care recognizes that the development, implementation, on-going evaluations of the Compliance Program, training of employees and providers, reviewing/enhancing standards and internal controls, as well as effective reporting is a time-consuming commitment for the Compliance Director and Compliance personnel. This program requires Compliance staff to work with every employee, Department, provider, committees, and respond accordingly to governing agents. Therefore, the Compliance Program is a steady process of procedures and has been implemented throughout the organization. Specific procedures for various components of the Compliance Program are contained within the specific policy.
2. The implementation date of Compliance policies is forty-five (45) days after approval from the Agency for Health Care Administration, Bureau of Medicaid Program Integrity for Title XIX and from CMS for Title XXI.

Attachments

Ped-I-Care Compliance Committee Member List

References

Health Care Compliance Association, *Evaluating and Improving A Compliance Program*, (April 2003)

State of Florida Statute for Medicaid Program Integrity and Federal Laws 42 *CFR* 438.608, *Chapters 358, 414, 641 and 932, F.S., and Section 409.912(21) and (22), F.S.(2006)*



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