



Policy & Procedure

CORPORATE COMPLIANCE PROGRAM INVESTIGATION AND CORRECTION OF SOCIETY- WIDE REPORTS OF NON-COMPLIANCE WITH LAWS AND REGULATIONS

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FUNCTION
Administration
NUMBER
VI.G
ISSUED
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REVISED
12/13

PURPOSE

- To set forth policy and procedure to be followed in the event of discovery of possible Society-wide systemic non-compliance with federal, state or local laws or regulations

POLICY

The Evangelical Lutheran Good Samaritan Society shall strive to remain in compliance with all applicable federal, state and local laws and regulations and shall take reasonable steps to investigate indications of non-compliance with such laws and regulations and to correct identified instances of non-compliance that may include the return to the government any health program payments which can reasonably be determined to have been paid inappropriately.

PROCEDURE

When reported or verified instances of non-compliance indicate Society-wide compliance concerns, the corporate compliance officer may form a team to investigate and correct the compliance problem(s) if any actually existed. When appropriate the team may use the Continuous Quality Improvement principles set forth in the Society's **QUALITY MANUAL**. As appropriate, members of the compliance management committee may help to formulate and participate in the investigative team. The investigative file may include:

1. A description of the problem, its scope and how the problem was identified;
2. A description of the investigative process, to include: a log of witnesses interviewed, interview notes and a list of documents examined and the relevant factual findings;
3. A description of the corrective action taken to include: procedural changes, educational efforts and disciplinary actions;
4. A description of on-going monitoring planned to assure system integrity; and
5. Any reporting to governmental agencies required and/or repayments to the government.

When intentional fraud is not involved, normal repayment channels (i.e., the fiscal intermediary) may be used to return overpayments.

If the investigation ultimately reveals that criminal, civil or administrative violations have occurred, the appropriate federal and state authorities should be timely notified of such determination, and any repayments necessary should be made during the course of such disclosure to the applicable federal and state authorities.