**Internal Compliance Program Policy**

**Purpose**

[INSERT ORGANIZATION NAME] is committed to creating and upholding an effective compliance program in accordance with the compliance program guidelines published by the Office of Inspector General (OIG), U.S. Department of Health and Human Services. The purpose for our compliance program is to avoid and identify violations of federal law and organizational policy.

This policy applies to all [INSERT ORGANIZATION NAME] employees.

**Standards, Policies, and Procedures:**

* Employees shall maintain professional and ethical standards in healthcare.
* All employees, including management employees, of [INSERT ORGANIZATION NAME] are obligated to conduct themselves in a manner that ensures the success of these standards.
* Employees shall remain in compliance with all applicable federal and state laws and regulations.
* Employees shall not discriminate against other employees, clients or patients, or any other individual based on race, sex, religion, gender, age, disability, sexual orientation, or national origin or ancestry.
* Employees shall not engage in false, fraudulent, or questionable billing practices, including but not limited to:
  + Services not medically reasonable or necessary
  + Altering medical records for deceptive motives
  + Overcoding
  + Downcoding
  + Unbundling
  + Duplicate billing
  + Submitting claims for services that were not documented or billing for services that are not supported by documentation
* Employees providing services to patients shall abide by appropriate documentation requirements for timely, appropriate, accurate and complete medical documentation.
* Employees responsible for securing service authorizations shall agree to request pre-defined medically necessary and reasonable services for patients.
* If there is any question or uncertainty regarding these requirements, seek direction from the Compliance Officer.
* Employees will use the company Infraction form to self-report or identify an area of potential infraction and submit to Compliance Officer for review.

Appointment of Compliance Officer

* An officer will oversee and implement [INSERT ORGANIZATION NAME] compliance program.
* [INSERT ORGANIZATION NAME] has appointed [INSERT EMPLOYEE NAME] as its Compliance Officer.
* [INSERT ORGANIZATION NAME] has chosen its Compliance Officer based on continued commitment to understanding of the applicable laws and regulations.
* The Compliance Officer will:
  + Develop, coordinate, audit or implement educational training programs for [INSERT ORGANIZATION NAME] employees.
  + Respond to inquiries from any employee regarding appropriate billing, documentation, coding and business practices.
  + Investigate allegations of possible wrongdoing.
  + Duties shall also include:
    - Working with the Leadership team and general counsel as needed.
    - Overseeing the implementation of written guidelines on specific federal and state legal and regulatory issues, and matters involving ethical and legal business practices.
    - Investigating information or allegations of possible unethical or improper business practices and recommending corrective action, when necessary.
    - Planning and supervision of periodic audits of [INSERT ORGANIZATION NAME] operations to identify and rectify any possible compliance issues.
    - Monitoring activities to verify the effectiveness of the compliance program.
    - Developing policies, materials, and programs that encourage employees to report suspected fraud, abuse, or inappropriate behavior.
* All employees are responsible for promptly raising concerns about any misconduct.
* Employees should raise concerns before problems develop.
* Concerns should be discussed with an immediate supervisor.
* If an employee is uncomfortable discussing a concern with their immediate supervisor, the employee should report the concern to:
  + Human Resource Department
  + Compliance Officer
* Because employees may be hesitant to report concerns if they believe that doing so may result in retaliation or harassment, [INSERT ORGANIZATION NAME] will protect employees from retaliation and maintain confidentiality.
* The Compliance Officer will respond promptly to detected problems and have discussions with appropriate parties for undertaking corrective action.

Training and Education

* [INSERT ORGANIZATION NAME] encourages training for employees that directly relates to their job.
* All employees shall receive mandatory compliance training as part of their new employee orientation.
* Employees will receive mandatory specific training based on each employee’s position and responsibilities within [INSERT ORGANIZATION NAME].

Auditing and Monitoring

* Ongoing auditing and monitoring are an essential part of any effective compliance program. Auditing and monitoring activities shall be conducted on an ongoing basis under the advisement of the Compliance Officer.
* Auditing and monitoring activities will be designed to address compliance with laws governing ICD-10, HCPCS and CPT coding and any other industry standard requirements for claims submission, including session note documentation.
* Focus will be place on compliance with specific rules and policies that have been identified by the OIG or the fiscal intermediary as high-risk areas.
* Overpayments identified shall be promptly refunded to the applicable payer with appropriate documentation and an explanation of the reason for the refund.

Enforcement

* [INSERT ORGANIZATION NAME] will document and maintain a record of every complaint received involving a potential infraction of any law or regulation related to healthcare fraud and abuse.
  + Included in the Infraction Form are the following:
    - Date received
    - Who or how the report was received
    - Details indicating a timely investigation and response
    - Summary of the action taken and the date the action was taken
* [INSERT ORGANIZATION NAME] Code of Conduct applies to all employees and will be enforced regardless of an employee’s position.
* Disciplinary action up to and including termination from employment may result if an employee fails to comply with the policies set forth by [INSERT ORGANIZATION NAME].
* Any employee that intentionally or recklessly fails to comply will be subject to significant sanctions.
* Disciplinary actions will be taken on a fair and equitable basis and will be applied in an appropriate and consistent manner.