

Corporate Compliance Plan

Healing Hands is committed to carrying out its home health care services in an ethical manner. Efforts towards the Compliance Plan promote prevention, detection, and resolution of situations of conduct that do not conform to federal and state rules and regulations relating to home health care program requirements and business practices.

Healing Hands' Corporate Compliance Plan is based on seven key elements of compliance programs as provided by the Office of Inspector General (OIG) of the Department of Health and Human Services. The seven key elements are as follows:

1. A written Code of Ethics and Code of Conduct
2. A designated Corporate Compliance Officer who can report the issues directly to the Administrator and Governing Body
3. A system to conduct background checks on all employees prior to hire
4. Staff training and education about compliance issues
5. Monitoring and auditing of compliance activities
6. Enforcement and discipline
7. Response and prevention measures

Written Code of Ethics and Code of Conduct: A Code of Ethics and Code is presented in orientation and in the Employee Manual. All employees sign receipt and understanding of the material in the Employee Manual.

Designated Corporate Compliance Officer: An employee has been designated that will report compliance issues directly to the Administrator and the Governing Body. A report is prepared to update the Board, at a minimum of once a year, but generally on a quarterly basis if there are any complaints. The responsibilities of the Corporate Compliance Officer include:

- Overseeing the implementation of the agency's Compliance Plan
- Participating in the review and revisions to procedures to conform to changes in applicable law and regulations
- Developing and executing training programs on compliance issues
- Monitoring internal practices
- Investigating Reports of problems or suspected violations

System to conduct background checks: Healing Hands conducts criminal background checks according to Indiana regulations by performing a state check prior to hire. All addresses for the previous two years are collected from employee candidates and a national search is conducted if they have lived out of state.

Staff training and education about compliance issues: Compliance education of employees at all levels is a significant element of the Compliance Plan. It includes staff awareness of fraud and abuse issues, state and federal rules and regulations relating to home health care program requirements. Basic training in compliance includes:

- An overview of fraud and abuse
- Key areas of concern and high-risk issues
- The Patient's Bill of Rights and Responsibilities
- How to report a corporate compliance issue

Monitoring and auditing of compliance activities: Healing Hands offers a way for employees to report compliance issues anonymously, if desired. The Corporate Compliance Officer will check for these issues on a routine basis and keep a log. In addition, employees are encouraged to report compliance issues at the time of their evaluation and at the time of their termination. Healing Hands also participates in ongoing reviews/audits.

Areas focused on can include relationships with third-party contractors, specifically those with substantive exposure to government enforcement actions. Areas reviewed would include looking for evidence of kickback arrangements, claim development and submission, reimbursement, cost reporting, and marketing. Any area of concern that has been identified by any state, federal, or internal entity will be reviewed and investigated.

If it is determined there is a deviation and it was caused by improper procedures, misunderstanding of rules, including fraud and systemic problems, the agency will take prompt steps to correct the problem. Any overpayments discovered as

a result of such deviations will be returned promptly to the affected payer, with appropriate documentation and a thorough explanation of the reason for the refund.

Monitoring techniques can include a review of any reserves Healing Hands has established for payments that it may owe to any state or federal health care program. Any reserves discovered that include funds that should have been paid back will be reimbursed promptly, regardless of whether demand for payment has been made.

Healing Hands will conduct an annual review of fraud and abuse issues and ensure there has been dissemination of the Corporate Compliance Plan's standards, training, and ongoing educations, and if issues are found, that disciplinary action has been taken as appropriate. This process will verify conformance with the compliance plan.

When it is found during the monitoring of issues that detection was not done in a timely manner due to deficiencies in the Corporate Compliance Plan, modifications will be implemented.

Enforcement and discipline: When employees are found to be failing to comply with agency standards and policies regarding applicable regulations, employees will be disciplined according to agency policies for progressive disciplinary action up to and including termination, as appropriate. This information is reviewed with new employees in their orientation at the time of hire.

Response and prevention measures: Violations of the Corporate Compliance plan, failures to comply with applicable state and federal law and regulation and other types of misconduct that are detected, but not uncorrected, can seriously endanger the mission, reputation and legal status of Healing Hands. Upon reports of reasonable indications of suspected noncompliance, the Compliance Officer or other designated management will initiate steps to investigate the conduct in question to determine whether a material violation of the applicable law or the requirements of the compliance plan has occurred, and if so, proceed in steps to correct the problem. Instances of noncompliance must be determined on a case-by-case basis. The existence or amount of a monetary loss to Healing Hands is not solely determinative of whether or not the conduct should be investigated and reported to governmental authorities.

Advice from counsel available to Healing Hands or an outside law firm may be sought to determine the extent of the agency's liability and to plan the appropriate course of action. Healing Hands acknowledges it is willing to police itself, correct underlying problems and work with the Government to resolve these matters as appropriate.

An internal investigation of suspected fraud or abuse may include interviews and a review of relevant documents. In certain circumstances, Healing Hands may consider engaging in outside counsel, reviewers, or health care experts to assist in an investigation.

After a reasonable period and as appropriate, when compliance issues were found, the Compliance Officer will review the circumstances that formed the basis of the investigation to determine whether similar problems have been uncovered.

If the Compliance Officer or designated management person discovers credible evidence of misconduct from any source, and after reasonable inquiry, has reason to believe the misconduct may violate criminal, civil, or administrative law, Healing Hands will promptly report the existence of such misconduct to the appropriate governmental authority within 60 days after determining there is credible evidence of a violation.