

# SSM Health Corporate Responsibility

## New Board Member Orientation

**Presented by Mindy Phillips, System Vice  
President, Corporate Responsibility**

**November 16, 2017**

# Corporate Responsibility Process (CRP)

The Corporate Responsibility Process, or CRP, is intended to demonstrate in the clearest possible terms the absolute commitment of the organization to uphold the highest standards of ethics and compliance throughout our ministry. The CRP ensures compliance with laws and regulations as well as with our mission, values and code of business ethics.

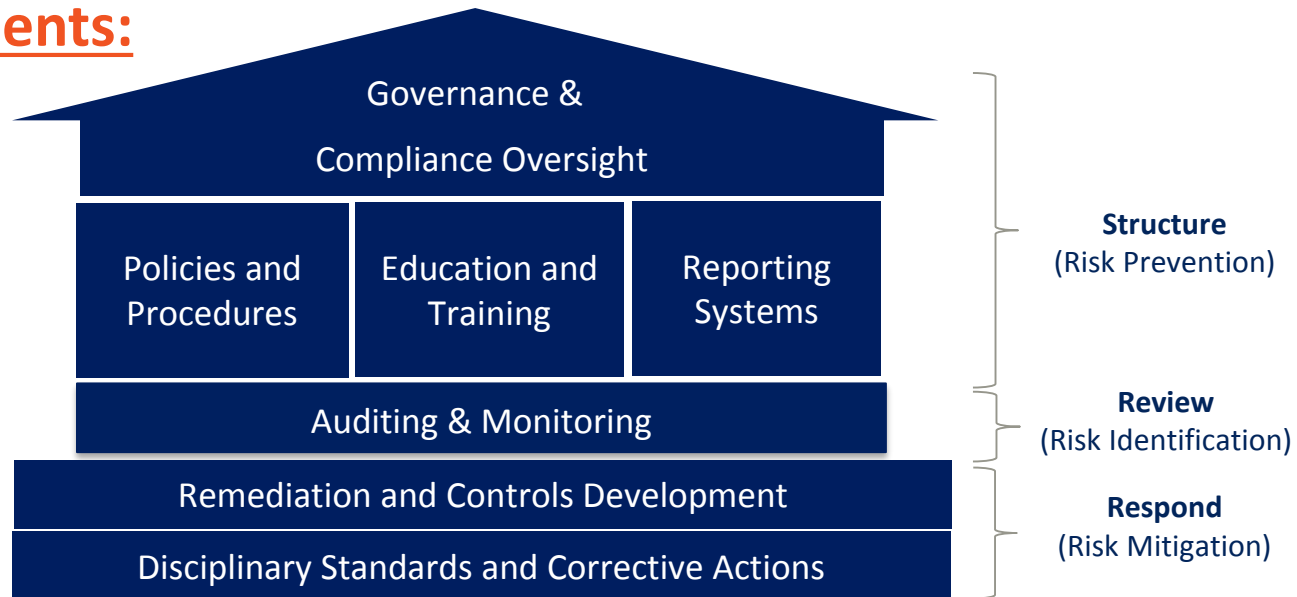
This presentation covers:

- ✓ Compliance program requirements for both providers and Medicare Plan Sponsors
- ✓ SSM Health's culture of compliance
- ✓ Health care enforcement trends
- ✓ Responsibility of the Board of Directors in compliance program oversight

# Compliance Program Requirements and Structure

- The Office of Inspector General (OIG) has outlined guidance for compliance programs. These are known as the 7 Elements of an Effective Compliance Program (shown below).
- CMS regulation outlines additional requirements for Part C and D Plan Sponsors.
- The Department of Justice released “Guidance” for compliance programs in the form of questions that can be considered during federal investigations.
- Compliance programs must be evaluated regularly for effectiveness and need to be able to quickly adapt to organization and environmental changes.

## The 7 Elements:



# SSM Health's Compliance Culture

- Code of Conduct
  - Includes Conflict of Interest Policy
- Annual Compliance Plan
  - Includes auditing and monitoring activities based on annual risk assessments
- Internal Reporting
  - Includes an anonymous Helpline and a non-retaliation Policy
- External Reporting
  - 60-day repayment rule and 6 year look-back period
- Investigation and Remediation

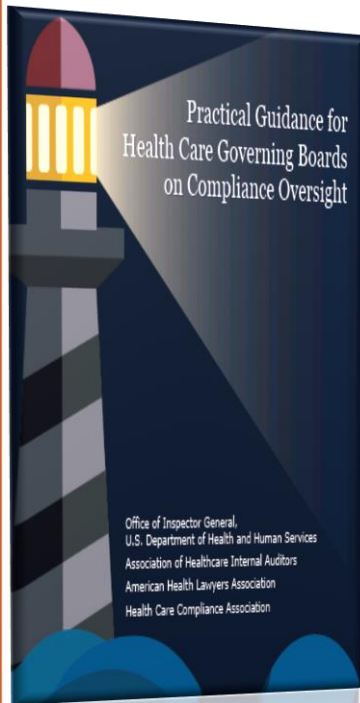
# Health Care Enforcement Trends

- Department of Justice (DOJ)
  - Yates Memo on Individual Accountability
  - Guidance entitled, “Evaluation of Corporate Compliance Programs”
- Corporate Integrity Agreements
  - Annual board resolutions
- CMS and OIG audits
  - Extrapolation

***Consider this:*** In 2014, the DOJ reported that for every dollar spent on health care-related fraud and abuse investigations through this and other programs in the last three years, the government recovered \$8.10.

# Board of Directors' Responsibility

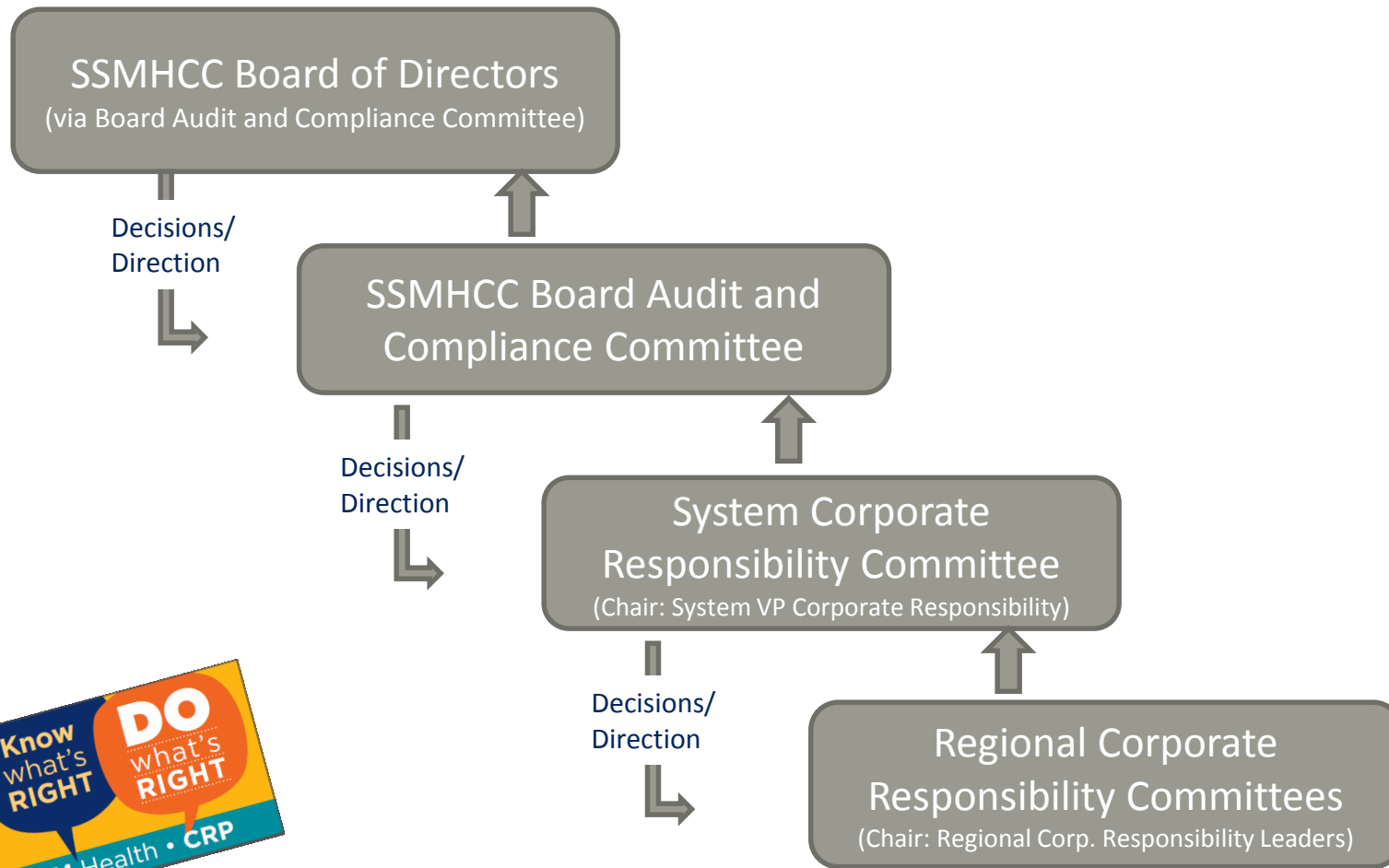
- Tone at the Top
- Active Oversight
  - Guidance for Health Care Governing Boards on Compliance Oversight



Issued by the HHS Office of Inspector General (OIG), and co-authored by the Health Care Compliance Association, the American Health Lawyers Association, and the Association of Healthcare Internal Auditors, this guidance sets forth a more activist role for boards in their organization's compliance with laws and regulations. It includes responsibilities such as:

- ✓ Leadership accountability for compliance,
- ✓ Supporting self-disclosure of compliance failures,
- ✓ Regular meetings with compliance officers to ensure open communication,
- ✓ Having an awareness of how the various departments (compliance, general counsel, internal audit, etc.) relate to each other, and
- ✓ Evaluation of the adequacy, independence and performance of those functions.

# COMPLIANCE PROGRAM REPORTING STRUCTURE:



If you have a question or concern about any process or activity being ethical, legal or in regulatory compliance, you may contact:

Mindy Phillips, System Vice President, Corporate Responsibility at 314-989-2647, or the CRP Anonymous Reporting Line via 877-4CRP-ASK or [www.CRPHelpLine.EthicsPoint.com](http://www.CRPHelpLine.EthicsPoint.com).