

COMMUNITY HEALTH PLANS OF WASHINGTON

COMPLIANCE TEAM CHARTER

Background:

Community Health Plans of Washington (CHPW) is committed to conducting its business in compliance with all applicable laws and regulations. To this end, the Board of Directors has directed staff to develop a compliance program that, at a minimum, has the following elements: (1) written policies, procedures, and standards of conduct, (2) designation of a compliance officer and compliance team, (3) effective education and training of employees on compliance matters, (4) methods for reporting potential violations of compliance requirements which protect the anonymity of the individual, (5) enforcement of standards, (6) internal monitoring and auditing, and (7) a process for reporting certain violations to external authorities. This document is intended to set forth the role of the Compliance Team in developing, implementing and managing the Compliance Program.

Purpose:

The Compliance Team performs an important role in CHPW's Compliance Program. It provides advice to and assists the Compliance Officer in developing and implementing the program. It is also a critical means for establishing a culture that promotes prevention, detection and resolution of instances of non-compliance.

Composition:

Sponsor:	Chief Financial Officer
Team Lead:	Corporate Compliance Officer
Team Members:	Vendor Liason, Director of Medical Management and Clinical Quality, Program Manager, Director of Human Resources, Operations Manager(s), Director of Finance, Director of Operations
Ad Hoc Members:	Director of Planning, CHIS Compliance Officer

Responsibilities:

1. Assists the Compliance Officer in developing and implementing the Compliance Program.
2. Assists the Compliance Officer in analyzing and assessing the operational implications of new or proposed federal and state legal requirements and identifying specific areas of risk.

3. Coordinate and assist departments in assessing existing policies and procedures that address these areas for compliance.
4. Working with appropriate departments, develop and recommend to the Management Council standards of conduct, policies and procedures to meet compliance requirements.
5. With the compliance officer, develop a system for monitoring internal and external audits.
6. Assist the Compliance Officer in implementation of new compliance requirements, and in identifying accountability.
7. With the Compliance Officer, develop the appropriate strategies or approaches to compliance, including training and education programs, to promote compliance with the program and to promote detection of potential violations.
8. Develop a system to solicit, evaluate and respond to complaints and problems regarding the program.
9. With the Compliance Officer, develop regular reports to the Management Council.

Outcomes/Products:

1. Corporate compliance plan that ensures compliance with state and federal laws, and contractual obligations.
2. Training program/modules to increase knowledge level of staff on how to respond to compliance issues.
3. Compliance monitoring plan.

Key Customers:

MAA, HCA, OIC, HCFA, OIG, Board, Ethics Committee, Management Council

Reports to:

Ethics Committee

Supporting Data/Evidence of Need:

Compliance programs are a required component of Medicare and Medicaid healthcare business.

Constraints/Limits/Special Issues:

The Compliance Program does not have direct responsibility for implementing process changes in departments, but the Program does play an enforcement role in identifying areas of improvement. Therefore it may become confusing at times as to what authority the Compliance Team has in relation to other parties at CHNW/CHPW. Active CHIS participation is critical to program success.

Team Charter Date:

- Established April 20, 2001
- Amended November 7, 2001

Sunset Provision:

This committee shall cease activities if it is deemed unnecessary to continue.