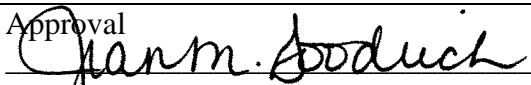


Chapter 3: Corporate Compliance	Effective Date: 11/1/18
Section 3.1: Compliance	Replaces Policies Dated: N/A
Policy 3.1.9: Auditing and Monitoring	Board Policy Reference:
Approval  By: Jean M. Goodrich, CEO Date: 11/1/18	Responsibility: Compliance Officer

PURPOSE:

The purpose of this policy is to articulate Summit Pointe’s commitment to an ongoing process of evaluation and monitoring to ensure the successful implementation and effectiveness of its compliance program.

POLICY:

An ongoing evaluation and monitoring process is critical to a successful compliance program. The Summit Pointe compliance program will incorporate thorough monitoring of its compliance program implementation and regular reporting to the Leadership Team and Corporate Compliance Committee. Compliance reports created by the ongoing monitoring and auditing efforts, including reports of suspected noncompliance, will be maintained by the Compliance Officer and reviewed with the Corporate Compliance Committee, Leadership Team and Board of Directors as required.

DEFINITIONS:

None

PROCEDURES / REQUIREMENTS:

In order to ensure the successful implementation of an effective compliance program, regular and periodic compliance audits will be performed by Compliance program staff who have expertise in Federal and State health care statutes, regulations and Federal health care program requirements. An annual compliance auditing and monitoring plan, based off a calendar year, will be developed and approved by the Corporate Compliance Committee. Audits will be planned based on risks identified through organizational risk assessments and the annual auditing and monitoring plan. In particular, the audits will focus on the risk areas known to affect Summit Pointe, especially the data and information that affect payments by Medicaid and Medicare as well as all other payer sources. Furthermore, compliance audit and monitoring efforts will also focus on any areas of specific concern identified within the environment and within the Office of Inspector General annual work plans.

The Compliance Officer or designee will provide and present written evaluative reports on compliance activities to the Chief Executive Officer, Corporate Compliance Committee, and Board of Directors on a periodic basis but not less than annually.

REFERENCES:

42 CFR, Ch. IV

ATTACHMENTS:

none