

Corporate Integrity Program Policy

Home Department: Corporate Integrity Program

IMPORTANT NOTICE:

The official version of this document is contained in the Policy and Procedure Manager (PPM) and may have been revised since the document was printed.

I. POLICY STATEMENT

The Corporate Integrity Program is an integral part of the Cedars-Sinai organization and works to ensure that its employees understand and comply with applicable laws and policies and adhere to the highest standards of ethics and integrity. Each employee plays a vital role in achieving this goal.

II. APPLICABILITY

The Corporate Integrity Program applies to the following entities (collectively, "Cedars-Sinai"): Cedars-Sinai Medical Center, Marina del Rey Hospital, Cedars-Sinai Medical Care Foundation, and other affiliates as designated by Cedars-Sinai Health System from time to time.

III. POLICY

Corporate Integrity Program:

The Corporate Integrity Program has, at its foundation, seven elements that federal guidelines have deemed necessary for an effective, high-quality compliance program. The Program is intended to provide additional assurance that Cedars-Sinai:

- Complies in all material respects with federal, state, and local laws that are applicable to its operations
- Satisfies the conditions of participation in health care programs funded by the state and federal governments, the terms of its contractual arrangements, and applicable requirements and waivers associated with CMS requirements
- Detects and deters criminal conduct or other forms of misconduct by Cedars-Sinai employees
- Promotes self-monitoring and provides for, in appropriate circumstances, voluntary disclosure of violations of laws and regulations
- Establishes, monitors, and enforces high professional and ethical standards

The Corporate Integrity Program includes the following elements:

1. Written Policies and Procedures:

a. Standards of Conduct

Cedars-Sinai sets the standards and expectations for integrity and compliance through the Standards of Conduct. The Standards:

- Describe compliance expectations

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- Provide guidance to employees and others on dealing with potential compliance issues
- Identify how to appropriately report compliance issues
- Describe how potential compliance problems will be investigated and resolved

b. Compliance Policies and Procedures:

Cedars-Sinai has a comprehensive set of policies and procedures that addresses a wide range of compliance-related issues, including those addressing physician relationships, coding, specific billing and reimbursement topics, and compliance-related human resources policies. Compliance policies and procedures will be understandable to those for whom they are written and updated routinely as the underlying laws, regulations and guidance changes over time. Compliance policies will be made readily available and accessible to all employees via the Intranet site to ensure access to the organization's policies on compliance topics or risks.

2. Designation of a Compliance Officer and Compliance Committee:

a. Board of Directors, Corporate Integrity Committee Oversight

The Board of Directors of each Cedars-Sinai entity is responsible for assuring that the entity implements and maintains an effective corporate integrity program. The Corporate Integrity Committee of the Board of Directors oversees Cedars-Sinai's corporate integrity efforts, receives reports on a regular basis from Cedars-Sinai's President and Chief Executive Officer and/or Chief Compliance Officer concerning implementation and maintenance of the Program, and gives direction to management, as necessary or appropriate, to ensure that Cedars-Sinai conducts its activities in compliance with all applicable laws and the Standards, and advises the Board of Directors regarding the Program.

b. Chief Compliance Officer

Cedars-Sinai's Chief Compliance Officer (also known as the Vice President of Corporate Integrity) is responsible for the Program, and all its component parts, for Cedars-Sinai and all its affiliated entities (except where provided otherwise in the Program). The Chief Compliance Officer is a Cedars-Sinai executive with direct access to each Cedars-Sinai entity's President and Chief Executive Officer and the Chair of the Corporate Integrity Committee for purposes of reporting on corporate integrity issues and Program matters.

c. Operational Corporate Integrity Committee(s) and Executive Management

The Operational Corporate Integrity Committee(s) advise the Chief Compliance Officer and assist in the implementation of the Program. The Committee(s) will identify specific integrity risks selected

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for focused attention during each fiscal year, receive reports from and provide guidance to management staff whose responsibilities include the area in which the integrity risk exists.

In order to maximize efficiency and ensure local management ownership for the monitoring and management of corporate integrity-related risks, executive staff overseeing operations in which corporate integrity risks may arise are expected to create, maintain, and appropriately staff corporate integrity functions within their respective areas of responsibility.

3. Education and Training:

a. Initial Compliance Training

All new employees receive an initial compliance training session. The training session emphasizes Cedars-Sinai's commitment to compliance with all applicable laws. A statement acknowledging the employee's commitment to and receipt of the Standards of Conduct will be signed, dated, and maintained in the employee's file.

b. Annual Compliance Training

On an annual basis, all current employees are required to complete compliance training. This includes appropriate training regarding applicable state and federal regulations and guidelines, summarizing fraud and abuse statutes and regulations, coding requirements, claim submission processes, and employee conduct. Annual training is mandatory and may affect an employee's annual performance evaluation. Cedars-Sinai's compliance training will meet all applicable regulatory requirements in terms of timing, frequency, and content.

4. Effective Lines of Communication:

a. Access to the Chief Compliance Officer and Corporate Integrity Department

Cedars-Sinai recognizes that clear and open lines of communication between the Chief Compliance Officer and employees are important to the successful implementation of the Corporate Integrity Program. The Chief Compliance Officer and Corporate Integrity Department managers are available by appointment, telephone call, email, or by contacting the compliance hotline. To that end, confidentiality and non-retaliation policies and procedures will be maintained to encourage communication and the reporting of incidents of potential non-compliance with the Program.

b. Methods of Reporting

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Cedars-Sinai maintains the following toll-free integrity hotline and address, so that employees have every opportunity to report concerns or possible wrongdoing regarding corporate integrity issues:

Hotline Telephone Number: 1-800-233-2775 (1-800-CEDARS5)
Address: Corporate Integrity Program
Cedars-Sinai
8700 Beverly Boulevard
Los Angeles, California 90048

Calls to the hotline and written communications will be treated confidentially, will not be traced, and may be provided anonymously. Cedars-Sinai will not retaliate against an employee for making a hotline call or written report regarding any integrity-related risk.

5. Enforcing Standards and Disciplinary Guidelines:

a. Sanction Screening Exclusion Checks

Cedars-Sinai conducts appropriate background investigation, including a reference check, as part of every such employment application. Cedars-Sinai conducts ongoing monitoring of federal and state exclusion lists and does not employ individuals who have been convicted of a criminal offense related to health care, or who are listed by a federal agency as debarred, excluded or otherwise ineligible for participation in federal health care programs.

b. Disciplinary Policies and Processes

Human Resources policies provide guidance for consistently applied and enforced discipline for non-compliant behavior. Disciplinary action taken regarding issues related to legal compliance will follow the currently established disciplinary process through the Human Resources Department.

6. Auditing and Monitoring:

a. Compliance Auditing

In addition to the Cedars-Sinai Corporate Integrity Work Plan conducted by Internal Audit, the Program routinely undertakes monitoring and auditing efforts in support of Cedars-Sinai Standards, policies, and compliance activities. The Chief Compliance Officer may, from time to time, employ the services of outside advisors who have expertise in federal and state health care statutes,

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regulations and federal health care program requirements. Such audits are designed to address, among other possibilities, compliance with laws governing kickback arrangements, physician self-referrals, coding, claim development and submission, reimbursement, cost reporting, and research.

b. Monitoring

The Chief Compliance Officer will monitor the implementation and effectiveness of the Corporate Integrity program and will recommend updates to improve the Program based on internal and external changes. The Chief Compliance Officer will provide updates on any monitoring results to the Corporate Integrity Committee of the Board of Directors.

7. Responding to Detected Concerns and Corrective Action Initiatives:

Cedars-Sinai investigates reported Compliance allegations and takes appropriate corrective action.

a. Investigations

All reports of compliance concerns will be investigated by the Corporate Integrity Department as appropriate to the nature of the concern. There may be instances where legal counsel is enlisted to oversee the investigation depending on the nature and severity of the events or processes involved.

b. Corrective Actions

When a compliance concern, or a risk for a possible compliance concern, is identified, corrective action will be taken to mitigate or eliminate the compliance risk from occurring or recurring. Appropriate actions may include the development of policies and procedures, providing education or awareness training, applying coaching, counseling or disciplinary action, improving processes, correcting errors, making refunds to government or private payers, etc.

c. Overpayments

Where compliance risks identify an overpayment to a government payer, such overpayments, once identified, will be returned to the applicable government entity within 60 days of the date of discovery.

Responsibilities of CS Employees:

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Cedars-Sinai employees and physicians who care for our patients are expected to understand and comply with the laws and regulations governing their job activities and the ethical and legal standards set forth in the Corporate Integrity Program. Cedars-Sinai will provide a copy of the Corporate Integrity Program Policy and the Standards of Conduct to all employees at orientation, who will be required to sign an acknowledgement stating that they have received, reviewed, and understood the policy. who will be required to sign an acknowledgement stating that they have received, reviewed, and understood the policy.

Responsibilities of Management:

All levels of management have the primary responsibility to set Cedars-Sinai's standard for corporate integrity and compliance. Executives, Directors, and Managers ("Management" or "Managers") serve as the primary example, and an important source of information, for Cedars-Sinai employees. Management must communicate the importance of compliance to every employee and actively promote adherence to the Corporate Integrity Program. Informally, Managers must foster open communications about compliance and must direct all appropriate compliance-related questions raised by employees to the Corporate Integrity Office. Certain Managers will be called upon to give formal presentations to employees explaining the Corporate Integrity Program and instructing employees on how to deal with various compliance-related issues.

Management has an affirmative duty to fully understand the Corporate Integrity Program and the Standards of Conduct and to ask any and all questions to clarify their obligations and the obligations of those employees they manage. No Manager will be excused based on a claim of ignorance or good intentions. Managers who fail to comply with these obligations may be terminated or otherwise disciplined.

All Managers must ensure that all actual or potential compliance issues are reported to the Corporate Integrity Office. In addition, all Managers must be accessible to employees who wish to report compliance issues. Managers also have the responsibility to ensure that no employee is retaliated against, in any way, for reporting a compliance issue. Managers are equally accountable for their own actions, as well as the actions of the employees who they supervise.

POLICY



Original Effective Date: 07/01/2013
Last Modified Date: 01/25/2021

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IV. RELATED DOCUMENTS

Standards of Conduct

V. REFERENCES

70 Fed. Reg. 4858; January 31, 2005
63 Fed. Reg. 8987; February 23, 1998

VI. POLICY APPROVALS

Record of Approval Dates	
Original Effective Date	7/1/13
Committee Approvals	
Audit Committee (Corporate Integrity Committee) of the Board of Directors	6/11/13
Corporate Integrity Committee Board of Directors	12/1/20
Board of Directors	1/25/21