

**Compliance and Ethics Program**

<b>Federal Regulations:</b>	<b>Effective Date: August 8, 2018</b>
<b>State Regulations:</b>	<b>Revision Date(s): February 27, 2023</b>

**PURPOSE:** To conduct business according to the highest ethical standards and in compliance with federal and state laws and regulations. To provide a systematic initiative to detect and prevent violations of federal and state laws and regulations and to correct any deficiencies.

**POLICY:** In an effort to conduct business according to the highest ethical standards and in compliance with federal, state and private insurer standards, Silverado maintains a Compliance Program that is described in Hospice's Code of Conduct and Compliance Plan.

The Compliance Program includes measures to detect and correct operational deviations from Silverado Hospice policies and procedures. The foundation of the Compliance Program is the Code of Conduct and Compliance Plan, which is the implementation of the Compliance Program.

Silverado Hospice and its employees understand and adhere to the Code of Conduct and Compliance Plan.

**PROCEDURE:**

- 1) Silverado is committed to complying with federal, state, and private insurance standards, and identifies, and corrects any instances of non-compliance.
- 2) The role of the Compliance Committee of the Board of Directors Governing Body is to demonstrate the governing body has established a reasonable and effective compliance oversight process.
- 3) The Compliance Program includes the following items that are described in the Code of Conduct and Compliance Plan:
  - a) Standards of Conduct and written policies and procedures to which all hospice employees must adhere;
  - b) A Compliance Officer and Compliance Committee to oversee the Compliance Program;
  - c) Effective lines of communication and a reporting system available for employees to report violations of the Standards of Conduct or other potential wrongdoing without fear of retaliation;
  - d) Effective staff education and training;
  - e) Enforcement of standards through well publicized disciplinary guidelines;
  - f) Conducting internal monitoring and auditing.
    - i) Annually, an audit work plan is developed and approved by the compliance committee.
  - g) Responding promptly to detected offenses and developing corrective action;
  - h) Conducting on-going risk assessments.
- 4) Annually an evaluation of the effectiveness of the Compliance Program is conducted and the findings reported to the Compliance Committee of the Board of Directors.