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Owner:	<i>Laura Carrico: Director of Compliance</i>
Area:	<i>Corp CCE - Corporate Compliance & Ethics</i>
References:	

Corporate Integrity Agreement (CIA) Policy



Tennessee Health Management, Inc. (THM), a subsidiary of American Health Companies, Inc. d/b/a American Health Partners (AHP), entered into a five year Corporate Integrity Agreement ("CIA") with the Office of Inspector General, Department of Health and Human Services ("OIG") in February 2019. While the CIA is not applicable to all subsidiaries of AHP, all owners, officers, directors, employees, contractors, subcontractors, agents and other persons who furnish patient care items or services or who perform billing or coding functions on behalf of THM as well as all physician and other non-physician practitioners who are members of THM's medical staff are expected to promote compliance with the statutes, regulations, and written directives of Medicare, Medicaid, and all other Federal health care programs.

POLICY

All employees of THM and its managed affiliates are expected to support the CIA obligations. This includes adherence to all compliance policies and procedures and completion of all compliance training and education within required timeframes. These obligations are a component of employee evaluations. Failure to support the CIA obligations will result in disciplinary action up to and including termination.

PROCEDURE

In accordance with the CIA, the Board of Directors and Certifying Employees (defined as the Chief Executive Officer, Chief Financial Officer, Chief Operating Officer, Chief Medical Officer, Chief Marketing Officer, Vice President of Quality and Operations- Skilled Nursing, Senior Vice President of Human Resources and Administration, and Regional Directors of Operations) are expected to monitor and oversee activities within their areas of authority and certify annually to the OIG that the applicable department is in compliance with applicable Federal health care program requirements and the obligations of the CIA. Additionally, the Chief Compliance and Ethics Officer must submit a written report to the OIG on an annual basis regarding compliance with the CIA requirements. The content of this report is specified in the CIA.

Attachments:

No Attachments

Approval Signatures

Approver	Date
Ben Sparks: AGC [LC]	04/2019
Kelly Thomas: Chief Compliance & Ethics Officer [LC]	04/2019
Laura Carrico: Director of Compliance	04/2019
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