

 <p style="text-align: center;">Heritage Provider Network &amp; Affiliated Medical Groups</p>	Program: Compliance			
	Policy No.	Effective Date: 01/01/2012	Page - 1 -	
	Authored by: Compliance Sub Committee	Date: 01/01/2012	Revised by: Sandy Finley	Date: 02/02/2015
	Approved by: Compliance Committee	Date: 02/02/2015		
Title of Policy: Compliance Program and Policies & Procedures				

**PURPOSE:**

To ensure that the Heritage Provider Network and Affiliated Medical Groups’ (HPN) Compliance Program and Policies & Procedures are maintained according to all current federal, state and local laws and regulations. Additionally, all compliance related materials, such as the Heritage Compliance Plan, which encompasses: Standards of Conduct, Policies & Procedures, training modules are reviewed and approved by the Board of Directors.

**POLICY:**

HPN is committed to complying with all federal, state and local regulations. To ensure that this commitment is met, all HPN compliance materials are continually reviewed and updated as regulatory requirements change, or as deemed necessary through routine auditing, monitoring, and identification of risks.

**RESPONSIBILITY:**

HPN’s Compliance Sub-Committee Members and Affiliated Medical Groups’ Compliance Officers.

**PROCEDURES:**

1. The Corporate Compliance Officer, Sub-Committee Members, and Compliance Officers are responsible for maintaining current knowledge of Compliance requirements including any continued changes in applicable laws, regulations, and other program necessities.
2. The Corporate Compliance Officer will periodically review the Compliance Plan, training materials, and Policies & Procedures to ensure continued compliance with all applicable federal, state and local laws and regulations; this includes reviewing the CMS website ([www.cms.gov](http://www.cms.gov)) at least quarterly to ensure that the most updated materials are being utilized.
3. Any revisions to the Heritage Compliance Plan, Standards of Conduct, Policies & Procedures, and training modules, due to changes in applicable laws, regulatory requirements, or audit findings, will be reviewed by the Compliance Committee, and approved by the Board of Directors, and updated as applicable. Changes are immediately communicated to HPN’s Affiliated Medical Groups’ Compliance Officer for dissemination.