

Title: LABORATORY COMPLIANCE PLAN

Scope: All activities connected with LABORATORIES Northwest.

Policy Statement: LABORATORIES Northwest has a strong commitment to ensure that its business affairs are conducted in a manner consistent with the Compliance plan of MultiCare Health System and regulations of Federal, state and local governments. To underscore LABORATORIES Northwest's commitment to regulatory compliance and to better assist its employees to comply with applicable requirements, the laboratory has implemented this Compliance Plan.

The Compliance Plan has the following key features:

- The establishment of written Standards of Conduct governing the actions of the organization and its employees and consultants;
- The appointment of an employee as Laboratory Compliance Officer (LCO), responsible for directing the laboratory's compliance efforts, including implementing the Compliance Plan;
- A means by which employees can raise questions and get appropriate guidance concerning billing and other issues pertaining to regulatory requirements without fear of retaliation;
- A process for employees to report instances of possible noncompliance and for a review of these issues;
- Procedures for the investigation and remediation of identified systemic and personnel problems;
- Formulation of corrective action plans to reduce the potential for future noncompliance with MultiCare Health System moral commitments and compliance policies and procedures;
- Regular procedure audits and billing reviews by LABORATORIES Northwest employees and/or external consultants to assess compliance and to identify potential issues;
- Regular reviews of the overall compliance effort to ensure that our billing and related practices comply with the Compliance Plan and that advisable adjustments are made;
- The adherence to requirements applicable to record creation and retention;
- The development and ongoing enhancement of standards, policies and procedures that LABORATORIES Northwest will follow with regard to compliance issues;
- The development of compliance initiatives appropriate to each department;
- Orientation training for new laboratory employees on LABORATORIES Northwest Compliance Plan;
- Incorporation of standards regarding adherence to compliance as an element in performance evaluations of laboratory employees including Directors, Managers, and Supervisors.

This document is primarily intended to establish a framework for regulatory compliance by LABORATORIES Northwest. MultiCare Health System already maintains various corporate practices, which are aimed at monitoring activities, and those practices

continue to be a part of its overall business compliance efforts.

Related Policies: MHS Corporate Compliance and Ethics Program

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1/11/2013 Expanded Medical Director review
1/2014 Expanded Medical Director Review
9/2014 Update Medical Director review; removed Dr. Hodges and added Dr. Love.

References:

Federal Register / Vol.63.No.163
College of American Pathologists GEN.20374
LABORATORIES Northwest Integrity Plan

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