

Vista Policies and Procedures

Policy Name: Compliance Program
Policy Number: CE 400
Responsible Authority: Compliance Officer
Original Effective Date: September 14, 2018
Revision Date: N/A

Vista is committed to quality care for the individuals that it serves; high standards of ethical, professional and business conduct; and full compliance with all applicable federal and state laws affecting the delivery of high-quality clinical services and payment of those services, including those that prohibit fraud and abuse or waste of resources. The Compliance Program applies to all Vista personnel, including but not limited to its Governing Board, administration, direct care staff, volunteers and other individuals providing services on behalf of Vista.

The purpose of Vista's Compliance Program, its policies and procedures, and its companion document, which is located on Vista's Intranet, is to establish and maintain a culture within Vista that promotes high standards of ethical business and clinical conduct. It also serves the purpose of prevention, detection and resolution of conduct that does not meet Vista's standards and policies, applicable law, and health care program or payer requirements.

The Compliance Program includes the following elements:

1. Written standards, policies and procedures which promote Vista's commitment to compliance with applicable laws and regulations
2. The designation of a Compliance Officer and Compliance Committee charged with the responsibility of implementing the Compliance Program
3. Regular, effective education and training programs for all Vista personnel as appropriate to their functions
4. A process to receive complaints concerning possible Compliance Program violations, procedures to protect the anonymity of complainants to the extent possible and policies that protect complainants from retaliation
5. A process to respond to allegations of improper activities and the enforcement of appropriate disciplinary action against Vista personnel who have violated Vista policies, regulations or health care program requirements
6. Periodic audits or other methods to monitor compliance and assist in the reduction of problems in any identified areas
7. A process for investigation and resolving any identified problems

Vista Policies and Procedures

Policy Name: Compliance Program
Policy Number: CE 400

The Compliance Program companion document is reviewed and updated annually, and is approved by the Board of Directors and Officers of the Company.

Compliance Officer Signature: _____ Date of Approval: _____