

## Corporate Compliance Program

Mental Health Cooperative (MHC), Integrated Health Cooperative (IHC) and NPS Pharmacy maintain high ethical standards and are committed to complying with all applicable statutes, regulations and guidelines. The Corporate Compliance Program (CCP) demonstrates the agency's commitment to ethical conduct and compliance by setting forth guidelines for conduct designed to prevent and detect violations of law, uphold accreditation standards, comply with agency policies and by encouraging compliance by providing support, training and educational resources.

The three primary components of the MHC Compliance Program are:

- Corporate Compliance
- Health Insurance Portability and Accountability Act (HIPAA) Compliance
- Occupational Safety and Health Administration (OSHA) Compliance

The CCP has been developed to assist in establishing a culture within MHC that promotes the prevention, detection and resolution of instances of conduct that do not conform to federal and state law; federal and state healthcare program requirements; or MHC's ethical and business policies.

Objectives of the Compliance Program are to reduce the potential for fraud, waste and abuse by:

- Providing additional oversight of MHC's compliance with fraud, waste and abuse laws, regulations and rules imposed upon it by regulatory authorities;
- Identifying and avoiding transactions or business practices that might result in irregularities in payment or reimbursement;
- Minimizing the loss to the government from false claims, thereby reducing MHC's exposure to civil damages and penalties, criminal sanctions and administrative remedies, such as exclusion from the Medicare and Medicaid programs;
- Encouraging employees to report potential fraud, waste and abuse;
- Improving operations; and
- Supporting MHC's commitment to providing quality consumer care.

In the event MHC becomes aware of violations of law or company policy, MHC will remediate the problem, investigate the matter and where appropriate, will take disciplinary action or implement corrective measures to prevent future violations.

### **MHC is Committed to...**

- Empowering employees, consumers, family members and community members to prevent, detect, respond to, report, and resolve conduct that does not conform with applicable laws, regulations, and the MHC Code of Conduct and Ethics; and
- Establishing a means for agency employees and those affiliated with MHC to raise questions and concerns about compliance issues.

### **Reporting**

MHC takes compliance very seriously and investigates all reports. If you have any questions or concerns you would like to speak to the Compliance Team about, please contact:

- Peggy Hoffman, CAO/CCO at (615) 743-1402, or
- Kim Speakman, Director of Compliance at (615) 743-1654.
- If you wish to remain anonymous, you may utilize the Compliance Hotline: 1-800-273-8452.

**Consumer / Family / Community Member Reporting Compliance Concerns**

If you suspect a violation of any policy, regulation, law or have a safety concern, please contact a member of the Compliance Team or you may notify Evelyn Yeargin, Consumer Advocate at (615) 743-1467 or by email at [eyeargin@mhc-tn.org](mailto:eyeargin@mhc-tn.org).

**Compliance Program Confidentiality**

MHC wishes to create a safe environment where employees, consumers, family members and other members of the community feel comfortable in reporting suspected illegal or unethical conduct, criminal activity, and/or safety concerns. MHC makes every attempt to protect the information communicated to the Compliance Team and always strives to protect an individual's confidentiality.

**“Compliance is Everyone’s Responsibility”**