

COMPLIANCE OFFICER POLICY

Objective

Outline PSI's requirements relating to PSI's Compliance Officer, as set forth in Section III.A of the Integrity Agreement

Compliance Officer Requirements

- PSI will appoint and maintain a Compliance Officer who will oversee PSI's Compliance Program
- The Compliance Officer must:
 - Be a PSI employee;
 - Be a member of senior management;
 - Report directly to the Chief Executive Officer (CEO) of PSI;
 - Not be or be subordinate to the General Counsel or Chief Financial Officer; and
 - Not have any responsibilities for acting as legal counsel or supervising legal counsel functions.

Responsibilities of Compliance Officer

- The Compliance Officer will be responsible for:
 - Developing and implementing policies, procedures, and practices designed to ensure compliance with the requirements of:
 - PSI's Advisory Opinion and Modification;
 - PSI's Compliance Program;
 - PSI's Integrity Agreement; and
 - The Federal health care programs.
 - Making at least quarterly reports regarding compliance matters to the PSI's Board of Directors;
 - Monitoring the day-to-day compliance activities engaged in by PSI;
 - Monitoring any reporting obligations created under the Integrity Agreement

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- Any noncompliance job responsibilities of the Compliance Officer will be limited and will not interfere with the Compliance Officer's ability to perform his or her duties under PSI's Compliance Program or PSI's Integrity Agreement.

Reports to the Board

- The Compliance Officer must provide compliance reports to the Board at least once per quarter but is authorized to report to the Board on compliance matters at any time.
- Compliance Officer reports to the Board must be documented in writing and maintained for at least 6 years.
- Written documentation of the Compliance Officer's reports to the Board must be made available to OIG upon request.

Reports to OIG

- Any changes in the identity of the Compliance Officer or any actions or changes that would affect the Compliance Officer's ability to perform the duties necessary to meet his or her obligations will be reported to OIG in writing within 5 days after such a change.

Related Information

Policy

- Conflicts of Interest Policy
- [Covered Person Policy](#)
- Compliance Violation Reporting Policy and Anti-Retaliation
- Training Records Policy
- Notification of Government Investigation or Legal Proceeding Policy

Procedure

- Procedure on Screening Ineligible Persons
- Reportable Events Process

Reference form

None

Education document

None

Script

None

Contacts

- Program Development Department

- General Manager



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