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Owner	David Lane: Chief Compliance Officer
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Applicability	Providence System wide + PGC
Labels	Policy, Posted on Internet

PSJH-CPP-POL Compliance Program Policy

Scope:

This policy applies to Providence and its affiliates[1] (collectively known as "Providence") and their caregivers (employees); employees of our affiliated organizations, professional staff, volunteers and others who are in the direct control of the organization; and members of the Providence System Board; Community Boards; and Foundation Boards, trustees (collectively referred to as workforce members).

☑ Yes ☐ No Is this policy applicable to Providence Global Center (PGC) caregivers?

This is a governance level policy, vetted by Executive Council with a recommendation for approval by the Providence Board and signed by the appropriate delegate.

Purpose:

This policy supports the Compliance Program Description and provides the plan and framework for Providence to maintain an effective Compliance Program consistent with our commitment to high ethical standards of corporate conduct and compliance with regulatory and statutory requirements to include but limited to: Fraud, Waste, and Abuse prevention and detection and our commitment to implement all seven elements of an effective compliance program as outlined in the **HHS-OIG General Compliance Program Guidance**.

Definitions:

Compliance Program is fully described in the Compliance Program Description and approved by the Providence Board of Directors.

Workforce Member is defined as all caregivers, employees of affiliated organizations, board of

directors, community board members, foundation board members, volunteers, students, independent contractors and other persons under direct control of a Providence entity, whether paid by Providence.

Policy:

Under the leadership of the Vice President/Chief Compliance Officer, the Compliance Program provides a supportive structure and applies to all workforce members. This program demonstrates the commitment of the Board and executive leadership to an effective compliance program and is based on the ethics and compliance program elements found in the United States Sentencing Commission's Federal Sentencing Guidelines, in conjunction with the compliance program guidance for various types of health care entities as issued by the Department of Health & Human Services, Office of Inspector General.
The Providence Board of Directors reaffirms their commitment to the Compliance Program annually.

Requirements:

Consistent with the Mission, Vision and Values of our organization, the Compliance Program establishes a framework to assist our workforce members in understanding the expectations related to integrity and being compliant with rules, regulations, organization policies and standards, and requirements that apply when providing services for our patients and consumers.
The Compliance Program includes, at a minimum, the following components:

1. *Written policies and procedures* that describe compliance expectations, including a Code of Conduct distributed across the family of organizations which includes all caregivers. Our Code of Conduct requires all workforce members to report any known or suspected violations of law or regulation.
    - A Code of Conduct distributed across the family of organizations which includes all caregivers. Our Code of Conduct requires all workforce members to report any known or suspected violations of law or regulation
    - To ensure compliance with contractual and regulatory requirements, Compliance will conduct an annual review of all Compliance owned policies.
    - A Compliance Program Description;
        - Policies that include key risk areas that the Compliance Program administers or has ownership of related to the process occurring, i.e.: Conflicts of Interest, monthly exclusions screening
        - Compliance infrastructure including committees and oversight; Auditing and Monitoring program; and
        - An educational framework to deliver consistent mandatory compliance education across the organization which includes:
            - Development, delivery and tracking of mandatory general compliance, privacy, information security, and fraud, waste and
              abuse (FWA) training for new hires within 90 days and annually thereafter for all caregivers.
            - Development, delivery and tracking of targeted and/or role-specific education for caregivers regarding

compliance high risk areas such as fraud, waste and abuse, conflicts of interest, gifts, civil rights, information privacy/security, etc.

- Communication, reporting
  - Compliance Program orientation for new caregivers;
  - Social media, email, other media to communication compliance topics, information
- Management of the anonymous mechanism for reporting and expectations of compliance when concerns are identified;
  - Communication lines accessible to workforce members that allow integrity and compliance concerns to be reported anonymously, the organization has an Integrity Hotline and Integrity Online, our web-based reporting tool.
  - Defining the process for investigating integrity and compliance concerns
  - Defining the process for reporting to appropriate agencies
  - Additional options for reporting concerns and having questions answered including contacting the following sources directly:
    i. Department Managers and Supervisors;
    ii. Human Resources/Legal;
    iii. Local/Regional compliance/privacy staff;
    iv. Chief Compliance Officer;
    v. Chief Operations Officer.
  - Response and Prevention Process related to compliance concerns raised
    -Assuring there is a policy of non-retaliation for good faith participation by any caregiver that reports concerns and/or assists in an investigation about actual or potential wrong-doing, including violations of law, regulation, policy, or our Code(s) of Conduct.
    -Assuring there is a policy related to obstructing an investigation.

2. Chief Compliance Officer appointment and Oversight Committee and committee infrastructure to assure Compliance Program is effectively implemented and managed.
3. **Duty to Report:** All caregivers have a duty to report any suspected wrongdoing or violation of applicable laws, regulations or policies. Workforce members who fail to fulfill this duty may be subject to corrective action pursuant to policy. Appropriate disciplinary policies that are consistently applied and provide for appropriate discipline or sanctions that are enforced.
4. A risk assessment process to identify, prioritize and manage key compliance risks resulting in an annual work plan. The process, at a minimum, includes:
   - Interviews with organization leaders;
   - Review of applicable guidance/information from enforcement, cognizant agencies,

etc.; and

- Trends provided by compliance risk data generated from self-monitoring, and internal and external audit activities.

Document Linkage:

Applicable Policies: (and Supporting Standards if applicable)	**PSJH-CPP-POL Providence Policy Development and Processing Policy** • PSJH-CPP-STA Administrative Access Standard for the Providence Document Repository System **PSJH-CPP-POL Disclosure Program and Duty to Report Policy** • PSJH-CPP-STA Investigations Standard • PSJH-CPP-STA Nonretaliation Standard • PSJH-CPP-STA Compliance Reporting Obligations Standard **PSJH-CPP-POL Fraud, Waste, Abuse Prevention and Detection Policy** • PSJH-CPP-STA Anti-Corruption Compliance Standard **PSJH-CPP-POL General Privacy Policy** • PSJH-CPP-STA Privacy Sanctions Standard **PSJH-CPP-737 Reporting and Investigating Potential Compliance Issues & Reportable Compliance Events Policy** (WA & AK hospitals) **PSJH-CPP-738 Contract Policy -Management, Storage, and Reporting Requirements** (WA & AK hospitals only) **PSJH-GOV-POL Conflicts of Interest Policy** • PSJH-CPP-STA Vendor/Supplier Interactions Standard • PSJH-CPP-STA Gifts, Gratuities, and Business Courtesies Standard PSJH-CPP-STA Conflict of Interest in Research Standard
Associated Standards: (with Supporting Documents if applicable)	PSJH-CPP-STA Code of Conduct Standard • Providence Code of ConductPoster PSJH-CPP-STA Nonretaliation Standard PSJH-CPP-STA Records Retention and Disposal Standard • Records Retention and Disposal Schedule PSJH-CPP-STA Use of Compliance and Related Titles by

	Employed Caregivers
Other Supporting Documents:	Compliance Program Overview Compliance Program Description

References:

Federal Sentencing Guidelines - Ethics and Compliance Program Elements
Office of Inspector General (OIG) General Compliance Program Guidance (GCPG)
Medicare Advantage Industry Segment-Specific Compliance Program Guidance (MA-ICPG)
Department of Justice (DOJ) Evaluation of Corporate Compliance Programs (2024)

Attachments:

None

Applicability:

[1]For purposes of this policy, "Affiliates" is defined as any entity that is wholly owned or controlled by Providence St. Joseph Health (PSJH), Providence Health & Services, St. Joseph Health System, Western HealthConnect, Covenant Health Network, Grace Health System, Providence Global Center*, NorCal Health Connect, or is jointly owned or controlled by PSJH or its Affiliates and bears the Providence, Swedish Health Services, St. Joseph Health, Covenant Health, Grace Health System, Kadlec, or Pacific Medical Centers names (includes Medical Groups, Home and Community Care, etc.). *Policies and/or procedures may vary for our international affiliates due to regulatory differences.

Approval Signatures

Step Description	Approver	Date
Document Management Office	Naomi Margolis: Senior Compliance Specialist	11/2026

Applicability

AK - Credena Health, AK - Providence Alaska MC, AK - Providence Kodiak Island MC, AK - Providence Medical Group, AK - Providence Seward MC, AK - Providence St. Elias Specialty Hospital, AK - Providence Valdez MC, CA - Credena Health, CA - Healdsburg Hospital, CA - Petaluma Valley Hospital, CA - Physician Enterprise Northern, CA - Physician Enterprise Southern, CA - Providence Cedars-Sinai Tarzana MC, CA - Providence Holy Cross MC, CA - Providence LCM MC San Pedro, CA - Providence LCM MC Torrance, CA - Providence Mission Hospitals, CA - Providence Queen of the Valley Medical Center, CA - Providence Redwood Memorial Hospital, CA - Providence Saint John's Health Center, CA - Providence Saint Joseph MC, Burbank, CA - Providence Santa Rosa Memorial Hospital, CA - Providence St. Joseph Hospital - Eureka, CA - Providence St. Joseph

Hospital Orange, CA - Providence St. Jude Medical Center, CA - Providence St. Mary Medical Ctr Apple Valley, MT - Credena Health, MT - Providence St. Joseph MC, Polson, MT - St. Patrick Hospital, NM - Covenant Hobbs Hospital, OR - Credena Health, OR - Providence Ctr for Medically Fragile Children, OR - Providence Health Oregon Labs, OR - Providence Hood River Memorial Hospital, OR - Providence Medford MC, OR - Providence Medical Group, OR - Providence Milwaukie Hospital, OR - Providence Newberg MC, OR - Providence Portland MC, OR - Providence Seaside Hospital, OR - Providence St. Vincent MC, OR - Providence Willamette Falls MC, PACE, PHCC - Home & Community Care, PHCC - Home Health, PHCC - Home Medical Equipment, PHCC - Hospice, PHCC - Infusion/Pharmacy, PHCC - Palliative Care, Providence, Providence Express Care, Providence Global Center, Providence Physician Enterprise, Providence Traditional Health Workers, TX - Covenant Children's Hospital, TX - Covenant Health - ACO, TX - Covenant Health Partners, TX - Covenant Hospital Levelland, TX - Covenant Hospital Plainview, TX - Covenant Medical Center, TX - Covenant Medical Group, TX - Covenant Specialty Hospital, TX - Grace Clinic, TX - Grace Surgical Hospital, WA - Credena Health, WA - EWA Providence Medical Group, WA - Kadlec Regional Medical Center, WA - NWR Providence Medical Group, WA - PacMed, WA - Providence Centralia Hospital, WA - Providence DominiCare, WA - Providence Holy Family Hospital, WA - Providence Mt. Carmel Hospital, WA - Providence Regional MC Everett, WA - Providence Sacred Heart Med Ctr & Children's, WA - Providence St. Joseph's Hospital, WA - Providence St. Luke's Rehabilitation Medical, WA - Providence St. Mary MC, WA - Providence St. Peter Hospital, WA - SWR Providence Medical Group, WA - Skilled Nursing / AL, WA - Swedish Medical Center, WA - Swedish Medical Group, WA - USFHP

Standards

No standards are associated with this document