



ESSENT HEALTHCARE, INC.

Section:	Corporate Compliance	Effective Date:	01/01/05
Subject:	Local Compliance Directors	Revision Date:	01/01/05
Policy #:	CC-11	Review Date:	11/19/09
Approved By:	VP Corporate Compliance	Revision #:	1

Scope:

This policy applies to all facilities of Essent Healthcare, Inc.

Purpose:

The purpose of this policy is to outline the role and responsibility of the Local Compliance Directors.

Policy:

It is the policy of Essent Healthcare, Inc. (Essent) to appoint a compliance officer at each facility. This individual must have achieved a Director level position at a minimum, and shall be referred to as the Local Compliance Director (LCD) for that facility. The LCD shall be a permanent member of the compliance committee and shall have the responsibility for overseeing the day-to-day operations of the compliance program at his/her facility. The LCD shall also work with the Corporate Compliance Officer (CCO) to conduct an annual risk assessment at his/her facility and implement policy/procedure changes as needed.

Procedure:

1. The CCO shall appoint one individual at each Essent facility to serve as the LCD for that facility. This individual must be at the director level or higher and will be responsible for:
 - a. Implementing changes to the program as they are developed by the CCO.
 - b. Analyzing their facilities environment with regards to compliance risk areas and forwarding potential issues to the compliance officer for investigation and resolution.
 - c. Assessing existing policies and procedures and recommending changes/improvements to the CCO.
 - d. Working with the appropriate hospital departments to develop procedures and deliver training for compliance purposes.
 - e. Documenting attendance at training and ensuring that all employees receive any applicable mandatory training and education.
 - f. Recommending and monitoring, in conjunction with the relevant departments, the development of internal processes and controls to ensure that the day-to-day operations at the facility are in compliance with all applicable rules and regulations.



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- g. Encouraging employees to step forward and report any and all instances of non-compliance

References:

OIG Compliance Guidance for Hospitals
HCCA Compliance Manual