



COMPLIANCE AND ETHICS OFFICER TASKS AND RESPONSIBILITIES

Documentation

The Compliance and Ethics Officer is responsible for ensuring that certain forms are signed by the appropriate parties and maintained in a centralized location.

Form/Title	Who needs to sign?	When should it be signed?	Template location	Month for annual re-signing	Location of signed forms
Compliance and Ethics Plan and Code of Conduct	All staff, contractors, and vendors.	Upon hire and annually thereafter. Confirm for existing employees/vendors	Policies Binder		
Deficit Reduction Act of 2005 policy and procedure (CCG 00201)	All staff, contractors, and vendors.	Upon hire and annually thereafter. Confirm for existing employees/vendors.	Policies Binder		
Overpayment Self-Disclosure training acknowledgement (CCG 00207c)	Billing staff, management.	Upon hire and Annually.	Policies Binder		
Elements of a Compliance and Ethics Program	All staff, contractors, and vendors.	Upon hire and annually thereafter. Confirm for existing employees/vendors			
HIPAA	Employees and on-site contractors.	Upon hire and annually thereafter.			
Conflicts of Interest Disclosure Form (CCG 00209a)	Any staff that have other business interests that may conflict with the Facility.	Upon hire and annually thereafter.	Policies Binder		
Substance Abuse Acknowledgement form (CCG 00307)	Employees and on-site contractors.	Upon hire. Confirm for existing employees.	Policies Binder		
Workplace Searches Acknowledgement form (CCG 00308)	Employees and on-site contractors.	Upon hire. Confirm for existing employees.	Policies Binder		

Form/Title	Who needs to sign?	When should it be signed?	Template location	Month for annual re-signing	Location of signed forms
Protecting Resident Privacy and Prohibiting Mental Abuse Related Recordings Acknowledgment form (CCG 00448a)	Employees and on-site contractors.	Upon hire. Confirm documentation for existing employees.	Policies Binder		
Elder Justice Act Training Acknowledgment Form (CCG 00304b)	All employees and others involved in resident care	Upon hire and annually thereafter. Annual training is required.	Policies Binder		

Investigations

The Compliance and Ethics Officer is responsible for ensuring investigations are conducted properly, in compliance with applicable laws and facility policy.

Activity/Document	Purpose	Responsible party	Template location
CCG Compliance and Ethics Reporting Form (CCG 00111a)	A standard format for compliance and ethics reporting.		Policies Binder
CCG Corrective Action Plan Template (CCG 00115a)	A standard format for documenting Corrective Action Plans and ensuring proper tracking and follow-up.		Policies Binder
Resident/Family Grievance form (CCH 00505a)	A standard format for documenting, tracking, and following up on resident or family grievances.		Policies Binder
Compliance and Ethics investigation log	A log should be kept to track all compliance and/or ethics complaints, investigation status, and corrective action plans, if applicable.		n/a

HIPAA

There are many HIPAA regulations that, in most facilities, fall under the responsibility of the Compliance and Ethics Officer.

Activity/Document	Purpose	Responsible party	Document location
Notice of Privacy Practices (NPP) Acknowledgment Form (CCG 00402a)	All residents should sign an NPP Acknowledgment form on admittance. The form should be included in the medical record.		Policies Binder
HIPAA Authorization for Use and Disclosure of PHI (CCG 00428a, CCG 00428b)	Either form is acceptable.		Policies Binder
Sign for fax machine (CCG 00412)	A sign should be posted near each fax machine.		Policies Binder
Email Confidentiality Statement (CCG 00411)	A confidentiality statement should be included in all company emails. A sample statement is provided.		
Inventory of Locations, Physical Systems, Devices, Media Containing Protected Health Information (CCG 00408b)	This inventory is required to be conducted annually.		Policies Binder
Business Associate Agreement (BAA) (CCG 00214; CCG 00214a).	A BAA is used to set the HIPAA parameters for third parties who handle the facility's PHI.	The Compliance and Ethics Officer should maintain a list of companies with whom the facility should have a signed BAA on file. The Compliance and Ethics Officer should also retain copies of the BAAs.	Policies Binder
Right to Accounting of Disclosures of PHI Information form (CCG 00424a)	Residents have the right to receive an accounting of parties to whom their medical records have been given.		Policies Binder
Request for Correction of Protected Health Information form (CCG 00423a)	Residents have the right to request certain changes or corrections to the medical record.		Policies Binder

Site posting requirements

The Compliance and Ethics Officer is often responsible for ensuring that required information is posted.

Document	Purpose	Template location
Compliance and Ethics Poster	This notice should be posted in prominent locations throughout the facility.	Provided by CCG
Elder Justice Act Notice (CCG 00304)	The notice should be posted where it can be viewed by employees and staff (not necessarily residents or visitors).	Policies Binder
Poster prohibiting videoing and recording of residents by staff and visitors (CCG 00446a)	The notice should be visible to staff, residents, and visitors.	Policies Binder
Grievance Notice (CCG 00505b)	Should be posted in prominent locations throughout the facility.	Policies Binder
Nondiscrimination notice (CCG 00503a)	Should be posted prominently.	Policies Binder
Taglines for those with Limited English Proficiency (LEP)	Should be visible to staff, residents, and visitors.	Policies Binder has more information (CCG 00509)
Notice of Privacy Practices (CCG00402)	Must be posted in a clear and prominent location.	Policies Binder
OSHA poster		n/a
Labor Law posters	Federal and state law require labor information to be posted, viewable by staff.	n/a
Fire Safety and evacuation diagrams	Should be posted as per local regulations.	
List of Names and Contact Info of all State Agencies and Advocacy Groups	This poster should include the name, email, mailing address and the phone number of all State Agencies and Advocacy Groups	n/a
Resident Complaint Poster	This notice is to inform the residents that s/he may file a complaint with the state survey agency concerning any suspected violation of state or federal regulations	n/a

Other responsibilities

Some other responsibilities that are often assigned to the Compliance and Ethics Officer.

Document	Purpose	Frequency	Template location
Compliance and Ethics Committee Meetings	The Compliance and Ethics Officer should schedule and conduct Compliance and Ethics Committee Meetings.	At least quarterly	
Physician Credentialing Packet and Sample Agreements	To ensure physicians and other providers are properly credentialed before providing treatment to residents.	Upon hire and every two years thereafter.	Policies Binder
Volunteer policy and procedure (CCG 00513 and CCG 00513a)	Policy on background checks for volunteers and who are permitted to be volunteers		Policies Binder
Documentation of required trainings	Required trainings modules include Corporate Compliance and Ethics Plan and Code of Conduct, Fraud/Waste/Abuse, HIPAA, Elder Justice Act requirements, OIG self-disclosure and overpayments (when relevant), Advance Directives (when relevant) and other required trainings such as fire safety and infection control.	Annual	n/a
OIG Exclusion list	Must be checked monthly.	Monthly	n/a
Web site	<p>If the Facility website provides information about services or benefits, a notice of privacy practices must be posted on the website.</p> <p>If the Facility posts jobs on its website, certain labor law notices and links should be included on the website. Please seek guidance from Labor Counsel.</p> <p>A full nondiscriminatory notice must be posted on the website.</p> <p>The name and contact information for the Compliance and Ethics Officer should be posted on the website.</p> <p>The website should include taglines. The taglines should be accessible from the website's home page and must include at least the top 15 languages spoken by individuals with LEP for the state in which the facility is located.</p>		
Quarterly Report to Governing Board	The Compliance and Ethics Officer must demonstrate communication with the governing body.	Quarterly	Provided by CCG