

Coffee and Contracts:
A Social Needs Contracting Community of Practice

Developing a Healthcare Compliance Program

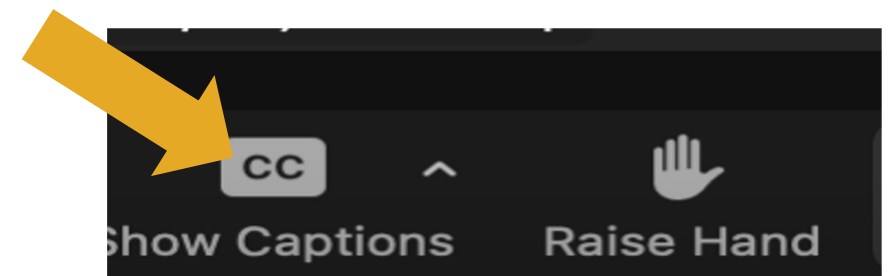
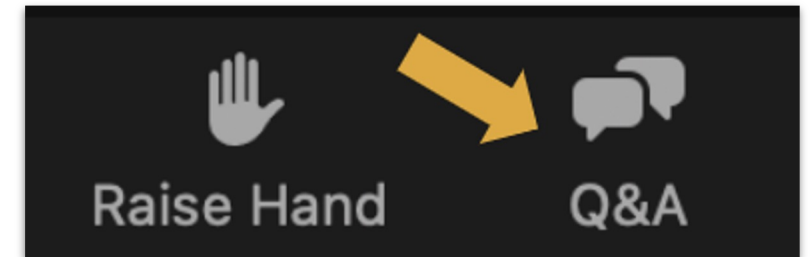
Mark Humowiecki, General Counsel & Senior Director of National Initiatives, Camden Coalition

Jennifer Raymond, Chief Strategy Officer, AgeSpan

September 10, 2024 | Noon-1:00 p.m. ET

Administrative Notes

- ✓ This meeting will be recorded and shared with registrants and posted on the Partnership website after the session.
- ✓ This session is about learning and creating partnerships. You drive the conversation.
- ✓ Please engage in the discussion on any level you prefer and are able to!
- ✓ Closed captions are provided for this session, can also click “Show Captions” to display automated captions



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Antitrust Statement

Aligning Social Care Planning Group

Antitrust Compliance Statement

It is the policy of the Aligning Social Care Planning Group (“ASCPG”) to conduct all its activities in compliance with federal and state antitrust laws.

During ASCPG meetings and other association activities, including all informal or social discussions among ASCPG members, each member shall refrain from discussing or exchanging competitively sensitive information with any other member. Competitively sensitive information includes, but may not be limited to:

- Prices, premiums, reimbursement, charges or payment rates, charged or paid, for any products or services
- Prices paid for or discounts received for significant expense items, such as major equipment or purchases, information systems, medical records systems, etc.
- Discounts provided to patients, payers or enrollees
- What products or services will be offered to enrollees, patients or payers
- Shares of geographic or product markets
- Plans to select, reject or terminate any payer, service or customer contract
- Salaries of professional and executive staff
- Any other information a member reasonably believes to be competitively sensitive information

In addition, ASCPG members shall not engage in any discussions with any other member regarding any of the following:

- Allocation of patients, enrollees, sales territories, sales of any product or service or contracts with providers or payers
- Refusal to deal with any provider, payer, or vendor, or any class or group of providers, payers or vendors

If you have any questions or antitrust concerns related to ASCPG programs, meetings, or activities, please consult with ASCGP legal counsel or your own legal counsel.

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COFFEE & CONTRACTS: A SOCIAL NEEDS CONTRACTING COMMUNITY OF PRACTICE

Developing a Healthcare
Compliance Program

10 SEPTEMBER 2024
NOON - 1 PM EST



Jennifer Raymond

Chief Strategy Officer,
AgeSpan



Mark Humowiecki

General Counsel & Senior Director
of National Initiatives,
Camden Coalition

Compliance

- Set of **policies, procedures, and controls** that an organization uses to ensure **adherence** to legal and regulatory requirements.
- Purpose is to **mitigate risks, prevent misconduct**, and demonstrate the organizations to **operating ethically**.
- Compliance programs are a **continuing** internal process that becomes a part of an organization's **culture**

7 Domains in HHS

- Implement written policies, procedures, and standards of conduct.
- Designate a compliance officer and a compliance committee.
- Conduct effective training and education.
- Develop effective lines of communication.
- Conduct risk assessment, internal monitoring and auditing.
- Enforce standards through well-publicized disciplinary guidelines.
- Respond promptly to detected offenses and undertake corrective action.

Risk management

Domains

- Document major risk areas, level of risk, mitigation efforts, accountable person
- Use to regularly manage change
- Communication to board, leadership, etc.

- Funding
- Trustees/members
- Organization
- Staff
- IT
- Health and safety
- Premises

Resources

- [General Compliance Program Guidance | Office of Inspector General | Government Oversight | U.S. Department of Health and Human Services \(hhs.gov\)](#)
- [A Nonprofit's Guide to Risk Management | Nonprofit Blog \(nonprofithub.org\)](#)

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Join us on Tuesday, October 8 @ Noon ET!

Coffee and Contracts: A Social Needs Contracting Community of Practice



2nd Tuesday of each month in 2024 @ Noon ET
Attendee Limit 300

- *Peer to peer learning about contracting between CBOs, CCHs, and healthcare organizations*
- *Engage new members to Partnership to Align Social Care*
- *Support new CCHs that are funded through ACL COE*
- *Generate new learning which can be packaged in new products (briefs, guides, blogs, webinars)*

Learn more and catch up on previous sessions at

www.partnership2asc.org/coffee-and-contracts

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Closing Survey

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Thank You!

Get in Touch!

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How to Get Involved in the Partnership...

- Sign up for our email list: <https://www.partnership2asc.org/sign-up/>

- Follow the Partnership on social media:



www.linkedin.com/company/partnership-to-align-social-care



@partnership2asc

- Reach out directly to:

- ✓ *Support the Partnership*
- ✓ *Ask about getting involved in leadership/workgroup activities*
- ✓ *Share your expertise/experiences*

Discussion Questions/Topics: Breakout Rooms

- We know that it is a long journey for CBOs to develop their compliance processes. Let's open up the floor - would anyone like to share their own experiences in compliance and/or risk management?
- Does anyone have any questions or thoughts on compliance and risk management?
- As the Contracting workgroup thinks about other topics to cover in future C&C sessions and resources to generate, are there specific topics you would like us to go deeper on in the realm of contracting processes? What resources would be most helpful to you?