



Policy: Certifying Employee Corporate Integrity Agreement

PURPOSE

To explain the process required for Certifying Employees to complete so that they are able to sign the required certification for each of the five Reporting Periods of the Corporate Integrity Agreement (CIA).

SCOPE

This policy applies to all *covered persons of Bluestone Physician Services, P.A., Bluestone National, LLC, and Bluestone Physician Services Wisconsin, and its subsidiaries and affiliates, (collectively, Bluestone Physician Services (BPS)).

*Covered persons means: (a) all owners who are natural persons, officers, board members, and employees of Provider; (b) all contractors who furnish patient care items or services or perform billing or coding functions on behalf of Provider; and (c) all physicians and other non-physician practitioners who are members of Provider's active medical staff.

POLICY

Certifying employees will complete the Certification for each of the five Reporting Periods as required by the CIA. In order to complete the Certifications, all Certifying Employees must follow the procedure outlined in this policy. The completion of the Certifications is a condition of ongoing employment with the Company.

Definitions:

Certifying Employees: All members of the senior management and the leaders of all business units, divisions or departments with operations that relate to the Federal Health care program:

1. Chief Executive Officer,
2. Chief Financial Officer,
3. Senior Vice President of Clinical Operations,
4. Vice President of Corporate Compliance - Compliance Officer
5. Chief Human Resources Officer,
6. Vice President of Value-Based Care,
7. Vice President of Growth,



Policy: Certifying Employee Corporate Integrity Agreement

8. Senior Vice President of Clinical Practice

Reporting Periods: each of the five 12 month periods following the effective date May 29, 2024 of the CIA.

Certification: the certification required to be completed for each of the reporting periods as defined in the CIA.

The language of the certification states: "I have been trained on and understand the compliance requirements and responsibilities as they relate to [insert name of business unit, division or department], an area under my supervision. My job responsibilities include ensuring compliance with regard to the [insert name of business unit, division or department] with all applicable Federal health care program requirements, obligations of the Corporate Integrity Agreement, and Bluestone Physician Services policies, and I have taken steps to promote such compliance. To the best of my knowledge, the [insert name of business unit, division or department] is in compliance with all applicable Federal health care program requirements and the obligations of the Corporate Integrity Agreement. I understand that this certification is being provided to and relied upon by the United States."

PROCEDURE

1. Certifying Employees are expected to monitor and oversee activities within their areas of authority on an ongoing basis.
2. Certifying Employees shall annually certify that their areas of authority are in compliance with Federal healthcare program requirements and the obligations of the CIA.
3. Certifying Employees must submit completed Certifications to the Compliance Officer no later than 15 business days after the end of each CIA Annual Reporting Period.
4. Certification Statement Records: The Human Resource Information System (ADP) system will record the certifying employee's annual certification, signature and date as outlined per the retention requirements of the CIA. Completed certifications must be provided to the Compliance Officer for retention as proof of compliance with the CIA. Records must be maintained and will be made available to the Office of Inspector General as required.
5. If at any time during the reporting period, a Certifying Employee becomes aware of any issue that would hinder their ability to complete the annual Certification, it should be immediately reported to their supervisor and Compliance Officer so that corrective



Policy: Certifying Employee Corporate Integrity Agreement

actions can be taken. The Compliance Officer must be notified immediately with a written explanation of the reasons why they are unable to provide the certification.

6. In order to ensure the Certification is accurate and complete, the Certifying Employees should take the following steps for their areas of responsibility, as applicable:
 - a. Determine the individuals within your department for which you will require a CIA sub-certification. At a minimum, sub-certifications should be obtained from those individuals with either departmental supervisory responsibilities or whose work has a more direct impact on any of the specific areas covered by the CIA, such as coding and billing. The sub-certification should state the following: "I have been trained on and understand the compliance requirements of the Corporate Integrity Agreement as it relates to my job responsibilities.
To the best of my knowledge:
 - We are in compliance with all applicable Federal health care program requirements and the obligations of the Corporate Integrity Agreement or,
 - I have disclosed the following matters for investigation and follow-up:
 - I understand that this certification is being provided to and relied upon by (Insert name and title of Certifying Employee)
 - b. Review reports to ensure employees are compliant with the training requirements of the CIA.
 - c. Review the results of any internal or external audits along with corrective action plans for identified deficiencies, including refunding overpayments if necessary, See Overpayment Policy.
 - d. Review any disciplinary actions taken related to compliance with the CIA.
 - e. Review hotline reports and related corrective actions for any identified issues or questions associated with Bluestone Physician Services' policies, code of conduct, practices, or procedures with respect to a Federal health care program believed to be a potential violation of criminal, civil, or administrative law.
 - f. Review for trends in activity and / or revenue.

ENFORCEMENT



Policy: Certifying Employee Corporate Integrity Agreement

All staff whose responsibilities are affected by this policy are expected to be familiar with the basic procedures and responsibilities created by this policy. Failure to comply with this policy will be subject to appropriate performance management pursuant to all applicable policies and procedures, up to and including termination

References:

BPS Corporate Integrity Agreement available at

[https://oig.hhs.gov/fraud/cia/agreements/Bluestone Physician Services_05292024.pdf](https://oig.hhs.gov/fraud/cia/agreements/Bluestone_Physician_Services_05292024.pdf)

Department of Health and Human Services, Office of Inspector General, Compliance Program
Guidance for Individual and Small Group Physician Practices available at:

<https://oig.hhs.gov/documents/compliance-guidance/801/physician.pdf>

United States Federal Sentencing Guidelines available at: <https://www.ussc.gov/guidelines>

Approval History

Approval Date (MM/YYYY)	Stakeholders	Approval Body
6/27/24	Executive Leadership Team Created by: Andrea Fuhrmanek-Kloubec on 6/27/24	Executive Compliance Committee (ECC) Meeting
8/9/24	Exec. Compliance Committee	ECC meeting

Revision History

Date (MM/YYYY)	Revisions	Name/Title	Version



Policy: Certifying Employee Corporate Integrity Agreement

1

¹Prepared at the direction, request, and in furtherance of the purposes of a review organization and any and all information and documentation prepared in furtherance of this policy is confidential and should not be shared outside of Bluestone Physician Services or its Affiliates. Protected under Wis. Stat. 146.38 and Minn. Stat. 145.61et seq. and FL Stat 766.101. The information contained herein is provided for informational purposes only and does not constitute legal, medical, or professional advice. Further, these policies and procedures are subject to change without prior notice, and Bluestone makes no representation to reliance on users of outdated information. Users should check back here for updates regularly.