



Compliance Log Policy

Subject: Responding to Compliance Issues

Policy Number: BPS RCI-005

PURPOSE

The purpose of RCI-005 is to outline the required maintenance of the Compliance Log.

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

It is Bluestone's policy to respond to all compliance matters brought to the Compliance Officer's attention, and to maintain a Compliance Log of such matters. The Compliance Log is a record summary of compliance disclosures and shall be maintained by the Compliance Officer (or his or her designee) in accordance with this Policy.

PROCEDURE

- A. Bluestone provides Bluestone-related individuals with various avenues to report any activity, practice, or arrangement that such individual believes, in good faith, violates or may violate any laws or regulations or Bluestone's Compliance Plan, Code of Conduct, or Policies and Procedures.
- B. The Compliance Officer (or his/her designee) must maintain a Compliance Log of all suspected compliance violations, including, but not limited to, reports made in person, via e-mail or other written form, or through the Confidential



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Compliance Reporting Tool.

C. The Compliance Log should, at a minimum, include for each suspected compliance violation the following:

1. The date the suspected compliance violation was brought to the ACO's attention;
2. The manner in which the suspected compliance violation was brought to the ACO's attention;
3. If applicable and known, the name of the person reporting the suspected compliance violation;
4. The names of all persons involved in the suspected compliance violation, to the extent such information is known;
5. The participant involved in the suspected compliance violation, if applicable;
6. A summary of the suspected compliance violations, including, not not limited to, the nature and type of allegation(s) made;
7. The results of any investigations;
8. The date of resolution;
9. Any notations regarding continued monitoring, if applicable;
10. A description of any corrective (or other) actions taken in response to the reported suspected compliance violation; and
11. The status of the suspected compliance violation, as updated from time-to-time to reflect current information
12. Notate if outside legal counsel was consulted

D. The ACO Compliance Officer, or his/her designee, shall maintain all relevant documents and notes related to each Compliance Log entry, in accordance with the ACO's document retention policies but, in no case, for a period of less than ten years.

DOCUMENTATION: Bluestone shall document compliance with BPS **RCI-005**. Such documentation, including electronic documentation, shall be maintained in the Bluestone Compliance Program files consistent with its document retention policies, not for less than ten years.



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RESOURCES

[1] 42 C.F.R. 425.300.

[2] The OIG provides detailed compliance program advice, including "best practices" at its website, www.oig.hhs.gov/compliance, including specific advice for separate types of entities. A review of compliance guidance posted here should regularly be undertaken to ensure a complete, up-to-date understanding of compliance requirements.

[3] 42 C.F.R. 425.314.

[4] Established under Section 3022 of the ACA, amending Title 18 of the Social Security Act by adding Section 1899, et seq.

[5] 76 Fed. Reg. 19528 (April 7, 2011), 76 Fed. Reg. 67802 (Nov. 2, 2011), 79 Fed. Reg. 72760 (Dec. 8, 2014), 80 Fed. Reg. 32692 (June 9, 2015), and 81 Fed. Reg. 37950 (June 6, 2016).

[6] Located at <http://www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/sharedsavingsprogram/index.html?redirect=/sharedsavingsprogram/>.

Approval History

Date (MM/YYYY)	Stakeholders	Name/Title
10/2/24	Executive Compliance Committee	

¹ Prepared 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.



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Revision History

Date (MM/YYYY)	Revisions	Name/Title	Version
10/2/24	Approved	ECC	1