TABLE OF CONTENTS

CHAPTER 2: STANDARD OPERATING PROTOCOL

- 2-1 I. COMPLIANCE PROGRAM OVERSIGHT
 - A. Operational Duties of the Compliance Officer
 - B. Annual Report to the Executive Vice President for Health Affairs
 - C. Evaluation of the Compliance Officer
- 2-4 II. INVESTIGATION OF POTENTIAL VIOLATIONS
 - A. Reports of Illegal, Unethical or Abusive Conduct
 - B. Protocol
- 2-6 III. EMPLOYEE CREDENTIALING
- 2-7 IV. CONTRACTOR AND VENDOR CREDENTIALING
- 2-9 V. TRANSACTION REVIEW
- 2-9 VI. EDUCATION AND TRAINING
- 2-11 VII. MONITORING AND AUDITING
 - A. Protocol
 - B. Audits
- 2-14 VIII. COMMUNICATION AND REPORTING
 - A. Mandatory Good Faith Reporting of Misconduct

- B. Comply-Line
- C. Confidentiality
- D. Reporting Channels
- E. Inquiries or Allegations
 - 1. Questions and Inquiries
 - 2. Allegations of Misconduct
- F. Anti-Retaliation

2-18 IX. ENFORCEMENT AND DISCIPLINE

- A. Protocol
- **B.** Sanctions
- C. Misconduct of Subordinates
- D. Abuse of Compliance Program Procedures

2-20 X. POST-VIOLATION RESPONSE

- A. Response Protocol
- B. Prevention of Repeated Violations

2-21 XI. AMMENDING THE CCP