



POLICY AND PROCEDURE MANUAL

SUBJECT Governing Board Annual Compliance Education	ACCOUNTABILITY NMRE Board of Directors	Effective Date: April 25, 2018	Pages: 1
REQUIRED BY	BBA Section: 42 CFR 438. PIHP Contract Section Other:	Last Review Date:	Past Review Date:
Policy: <input checked="" type="checkbox"/> Procedure: <input type="checkbox"/>	Review Cycle: Author: Compliance Officer	Responsible Department: General Management	Reviewers: NMRE Operations Department

Definitions

DRA: The Deficit Reduction Act of 2005

MDHHS: Michigan Department of Health and Human Services

Purpose

This policy is intended to clarify the Northern Michigan Regional Entity (NMRE) Governing Board's policy governance role; to keep the Board focused upon its philosophy, accountability, and the specifics of its role.

Policy

The NMRE Governing Board is responsible for ensuring the NMRE has an effective Compliance Program. To achieve this goal, the NMRE Governing Board reviews regular reports and takes appropriate action to ensure the NMRE is following compliance guidelines.

Approval Signature

NMRE Chief Executive Officer

Date

SUBJECT Governing Board Annual Compliance Education Procedure	ACCOUNTABILITY NMRE Board of Directors	Effective Date: April 25, 2018	Pages: 2
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Procedure

In addition to any other actions that may be necessary and appropriate to fulfill the purpose of Compliance, the Governing Board shall:

1. Complete Disclosure of Ownership as required.
2. Act in "Good Faith"
3. Adhere to the NMRE Compliance Plan
4. Review and approve the compliance plan, compliance related policies, and annual compliance report.
5. Have the highest level of oversight of the compliance plan.
6. Abide by the Code of Ethics.
7. Assist in establishing a workplace culture that promotes prevention, detection, and resolution of instances of conduct that do not conform with applicable laws and regulations.
8. Participate in annual Deficit Reduction Act (DRA) training required by MDHHS.
9. Maintain the confidentiality of any compliance issues brought before it consistent with applicable NMRE policies, laws and regulations.
10. Assist with certain non-compliance or conflict of Interest issues.

Other Related Materials

NMRE Bylaws

NMRE Board Member Compliance Training-ppt

NMRE Standards of Conduct

References

Corporate Responsibility and Corporate Compliance: A Resource for Health Care Boards of Directors.
The Office of Inspector General of the U.S. Department of Health and Human Services and The American Health Lawyers Association.

Approval Signature

NMRE Chief Executive Officer

Date